

**United Kingdom Holocaust Memorial  
and Learning Centre**

Design and Access Statement Addendum  
April 2019

Adjaye Associates

*Ron Arad Architects*

Gustafson  
Porter +  
Bowman

on behalf of The Secretary of State for Housing, Communities & Local Government



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# INTRODUCTION

1

# 1.1 EXECUTIVE SUMMARY

## Executive Summary

This document sets out our proposals for the United Kingdom Holocaust Memorial and Learning Centre Planning Application, situated within Victoria Tower Gardens in Westminster.

The design proposals explained within this addendum are submitted following consideration of the consultation responses received from local residents, local amenity groups, statutory consultees, on the application submitted in December 2018, and following meetings with the City Council and Historic England.

The revised proposal retains the original Masterplan and incorporates the following amendments:

- Revised design for the Entrance Pavilion;
- Adjustments to the design of the memorial courtyard and associated landscaping;
- Rationalization of the Learning Centre footprint
- Extension of the Learning Centre Mezzanine level;
- Repositioning of the skylight within the landscape

The new design for the Entrance Pavilion aims at making it a lighter, more transparent element that enhances and harmonizes with the existing gardens. The new proposal responds to feedback received regarding the view from the south end of the site. Along with the new proposal, a new verified view is included from the Playground area.

Adjustments were made to the Memorial Courtyard layout and perimeter to adapt to the new Entrance Pavilion design whilst further considerations were given to the gardens. The Memorial Courtyard layout was made simpler and more intuitive, whilst simultaneously making it more inclusive. The courtyard boundary fence was simplified: the 1800mm tall glazed panels were removed and replaced by a 1100mm tall fence that allows a clearer view of the Buxton from Millbank particularly the axis view from Dean Stanley Street towards the gardens.

The Learning Centre footprint was rationalised at the western and northern end, pulling the building away from the trees and from the existing Thames Storm Overflow Sewer, by reducing the size of the basement footprint. This also reduces construction time/excavation and improves logistics on site.

The Mezzanine level has been extended in order to maintain the same quantum of floor space for the exhibition area. This led to the careful repositioning of the feature staircase and consequently, the skylight within the landscape.

The proposed design changes are considered to enhance the scheme and improve views towards Victoria Tower Gardens and the Palace of Westminster, in particular from the south end of Victoria Tower Gardens.



View from top of landform looking north towards the Houses of Parliament

# DESIGN PROPOSALS

2

# 2.1 MASTERPLAN

December 2018 Application



KEY  
- - - Project Boundary

December 2018 Masterplan proposal and Site section



**April 2019 Amendment**

The current proposal retains the original Masterplan and incorporates the revised design for the Entrance Pavilion, adjustments to the design of the Memorial Courtyard and associated landscaping and repositioning of the skylight within the landscape.



**KEY**

--- Project Boundary



Current Masterplan proposal and Site section

## 2.2 ENTRANCE PAVILION

### Design overview and Precedents

The considered revision of the Entrance Pavilion addresses the desire for a lighter, more open element that embeds itself within the landscape and strengthens its relationship with the multi-finned Memorial beyond. Through a series of spaced stone columns, the revised pavilion tempers the solidity of its ancestor and embraces new levels of transparency. This rhythmic arrangement recalls the sensibilities of traditional garden pavilion architecture, having lighter, airier visual properties that harmonise with the natural ambient surroundings throughout the seasons.

The revised pavilion has been lowered in height, facilitating greater views within the park and towards the nearby Memorial and Houses of Parliament. Its adjusted triangular plan likewise works to maximise the virtues of its site and orientation, extending the entrance space and improving the spatial quality that welcomes visitors approaching from Millbank at Park Entrance 4. This calculated amendment enables a strong visual conversation with the neighbouring curved Spicer Memorial, and casts uninterrupted views towards the playground, nearby steps, and Lambeth Bridge beyond. The modified height and plan activate an improved southern connection across the site, offering visitors enhanced vistas and quality of space.

The uniform vertical columns which form the perimeter walls echo the linearity of the Holocaust Memorial itself, albeit using a different material palette and scale. The pavilion is both permeable and sheltered, blurring the lines between outside and inside. Glass walls are used internally to further harness the transparency of the pavilion as a whole.

Our revised iteration has been adapted to deliver a more congenial building - a pavilion that places transparency, access, and approachability in scale at the forefront of its design. Our continued consideration of this historical site with its many beloved remembrance buildings has informed our desire to ensure the entrance pavilion operates harmoniously in its location.



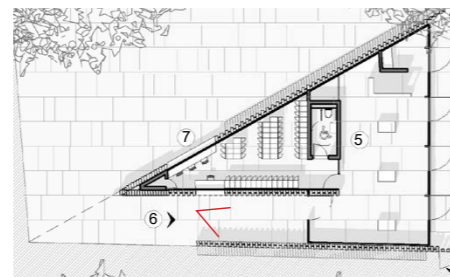
LIGHT WEIGHT PAVILION IN NATURAL SETTING - YOUR BLACK HORIZON, T-BA 21, LOPUD



TEMPLE OF ANCIENT VIRTUE, STOWE PARK, BUCKINGHAMSHIRE



FARNSWORTH HOUSE, ILLINOIS



Keyplan



View inside Entrance Pavilion look towards the Thames

December 2018 Application



View from Lambeth Bridge

April 2019 Addendum



View from Lambeth Bridge



View looking south toward Buxton Memorial

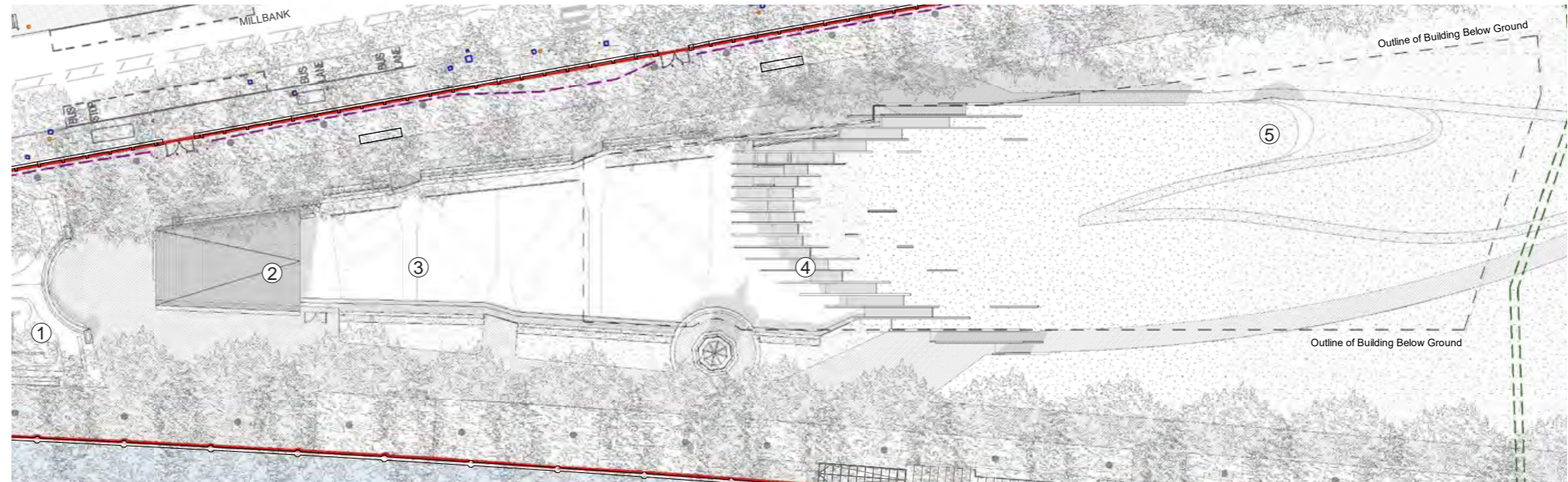


View looking south toward Entrance Pavilion with Memorial Courtyard in front

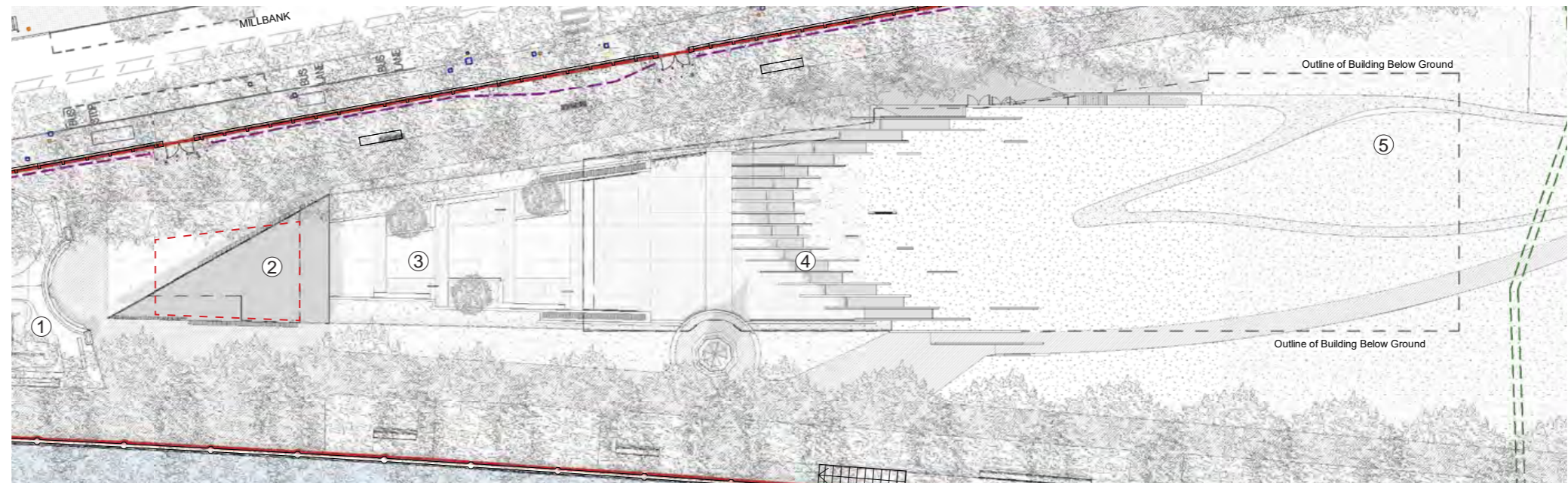
Site Plan

The amended proposal includes a triangular shaped pavilion that creates a greater sense of space and openness from Park Entrance 4 allowing a visual connection to the Spicer Memorial

December 2018 Application



April 2019 Amendment



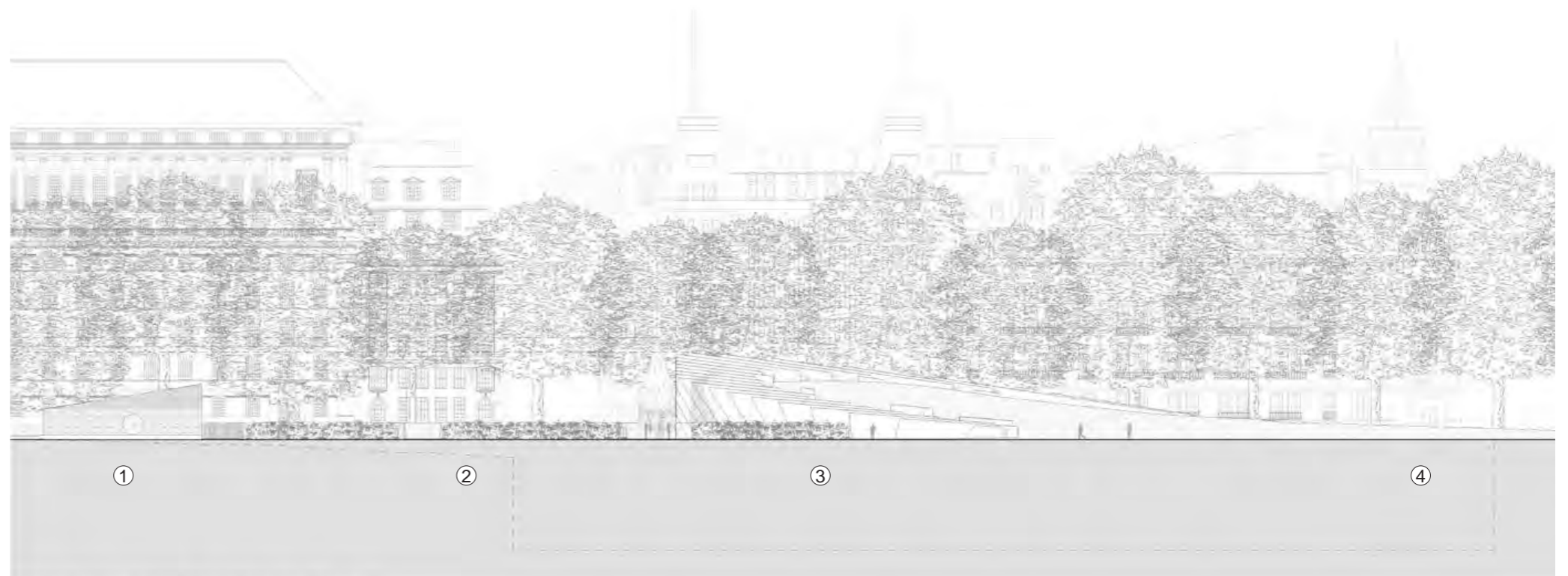
- Key:
- 1-Spicer memorial
  - 2-Entrance Pavilion
  - 3-Memorial Courtyard
  - 4-Memorial Fins
  - 5- Skylight
  - - - Outline mass of Stage 3 Entrance Pavilion



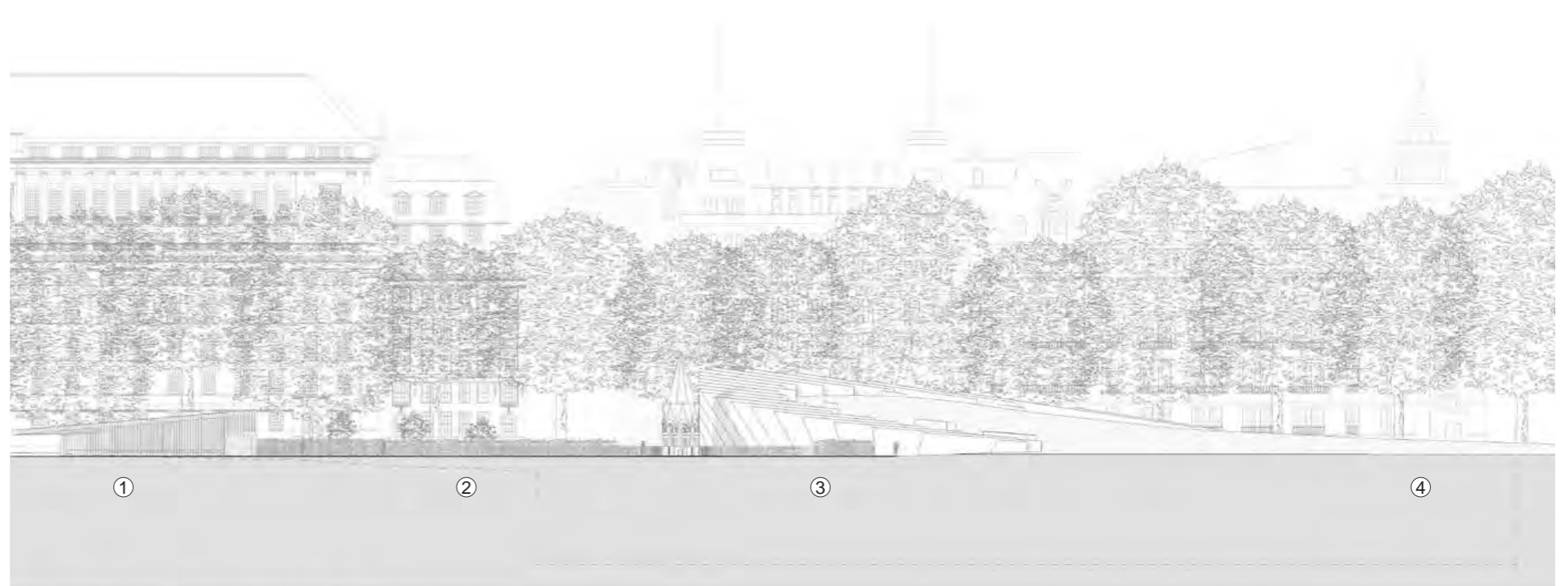
Site Elevation



December 2018 Application



April 2019 Amendment



- Key:
- 1-Entrance Pavilion
  - 2-Memorial Courtyard
  - 3-Memorial Fins
  - 4- Skylight

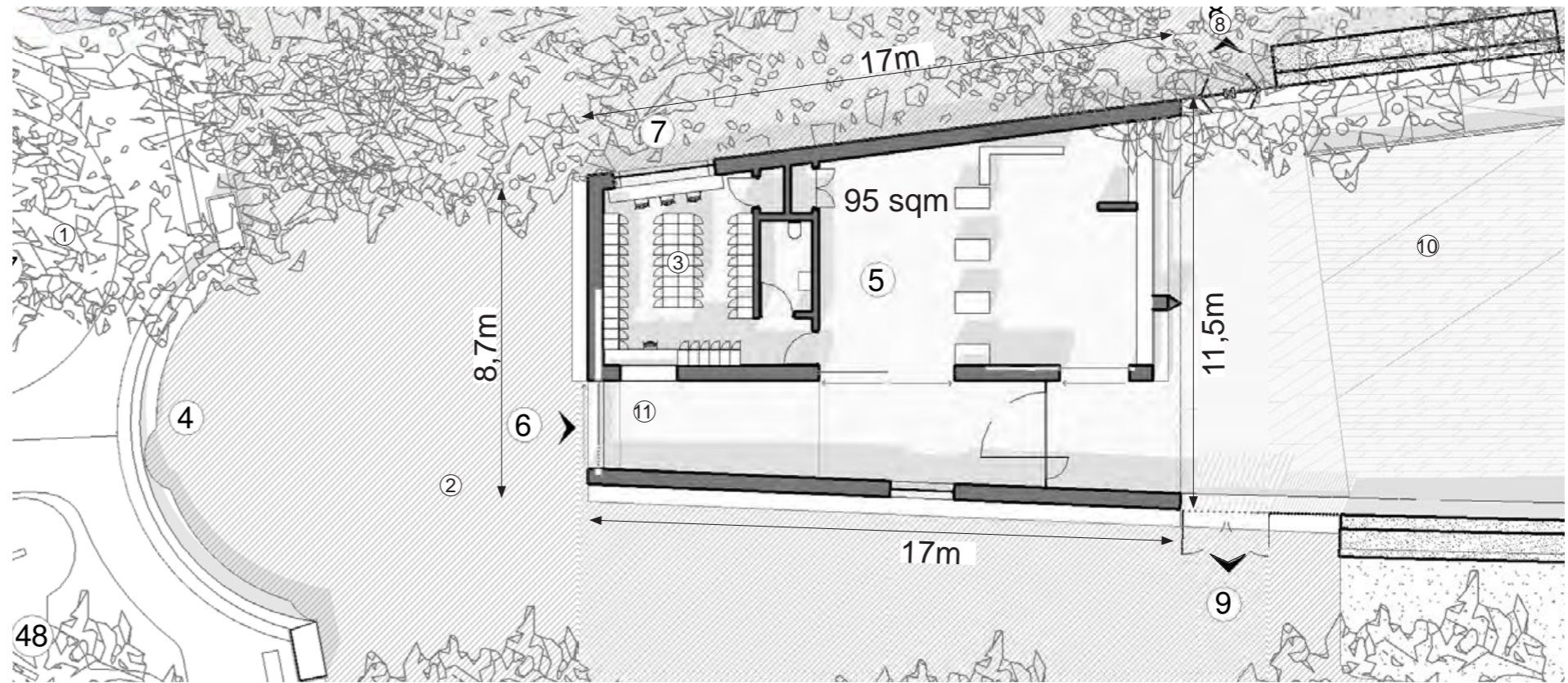
Plan

As per the December 2018 Application the small pavilion incorporates a covered entrance at the east side, where tickets will be checked. This space connects directly to the security area where small bags will be checked. The locker area includes two windows, one facing the covered entrance for a bag drop off desk and a second window facing Millbank providing information and bag collection points..

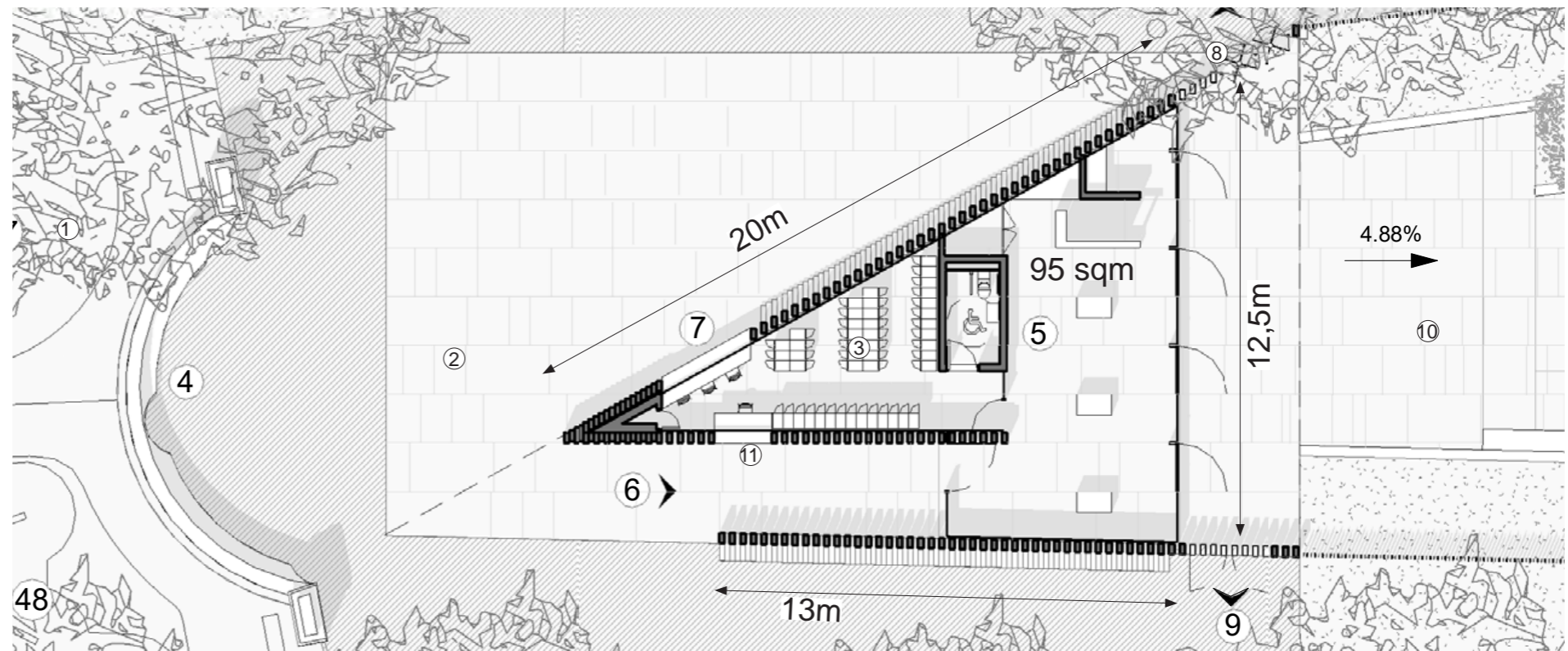
The proposal identifies a dedicated gathering area on the east and west side of the Entrance Pavilion where a long bench invites NHM visitors to sit or gather without disturbing the normal gardens users' movements.

The Pavilion walls are composed of vertical columns that are spaced to allow visual connection through the Pavilion and blurring the lines between outside and inside.

December 2018 Application



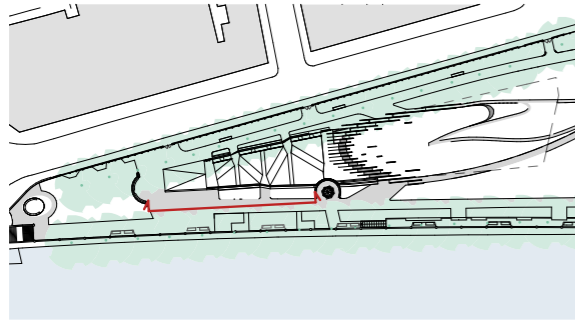
April 2019 Amendment



Key:

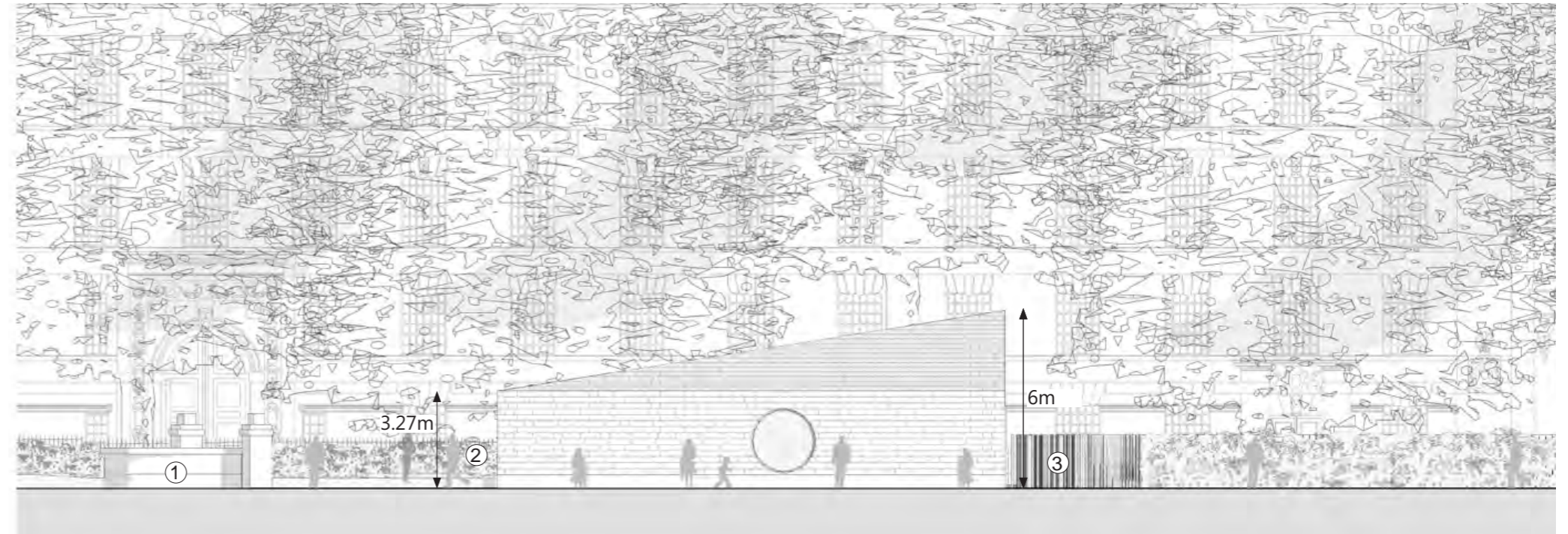
- 1- Playground
- 2- Old location Spicer memorial
- 3- Lockers
- 4- Spicer memorial
- 5- Bag check
- 6- Main entrance
- 7- Bag collection
- 8- Main exit
- 9- Emergency exit
- 10- Memorial courtyard
- 11- Bag drop off

East Elevation

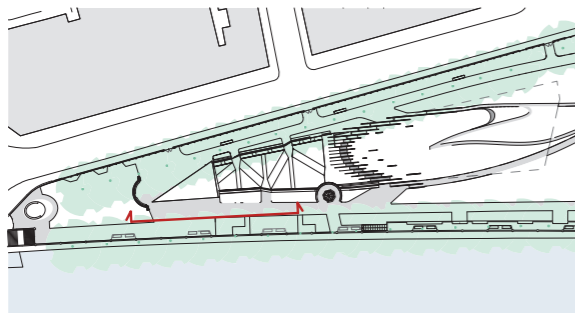


Keyplan

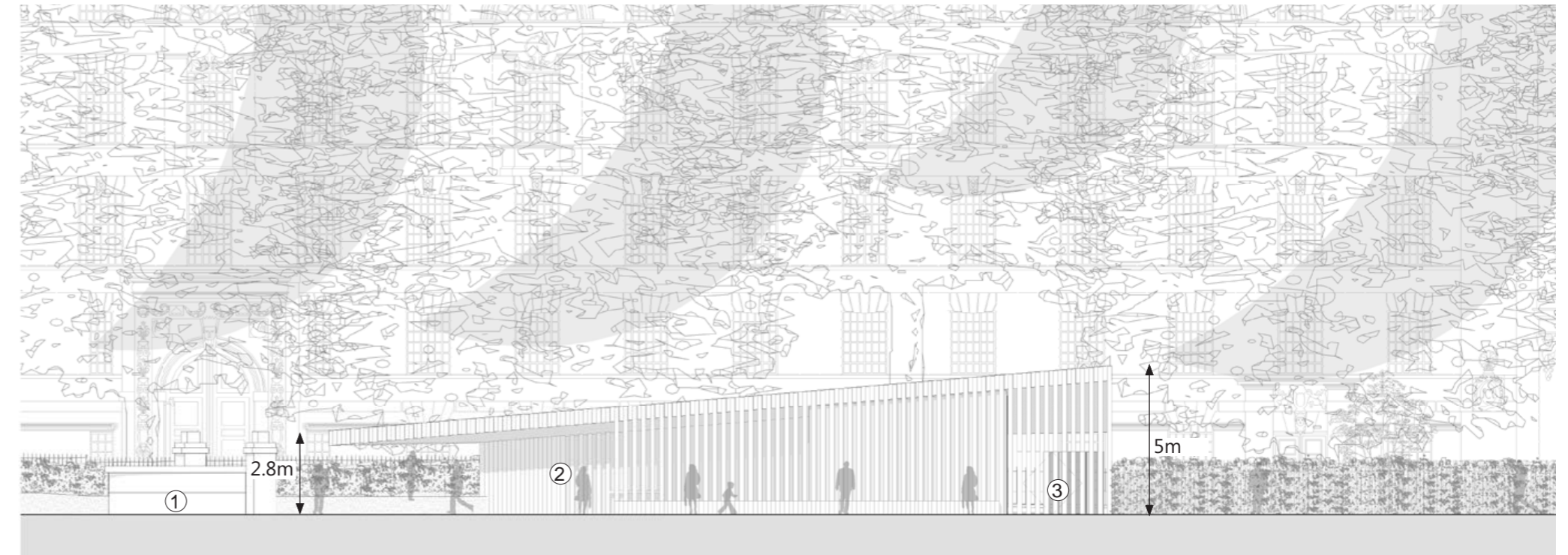
December 2018 Application



April 2019 Amendment



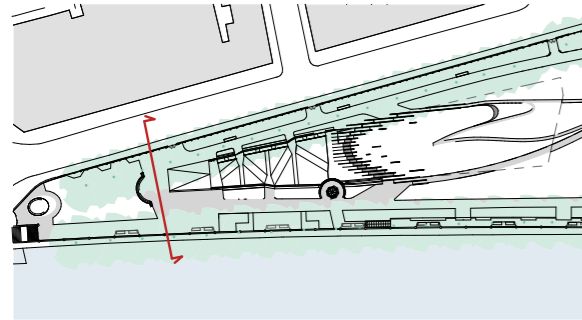
Keyplan



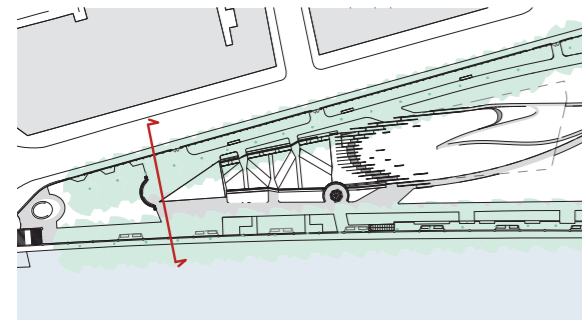
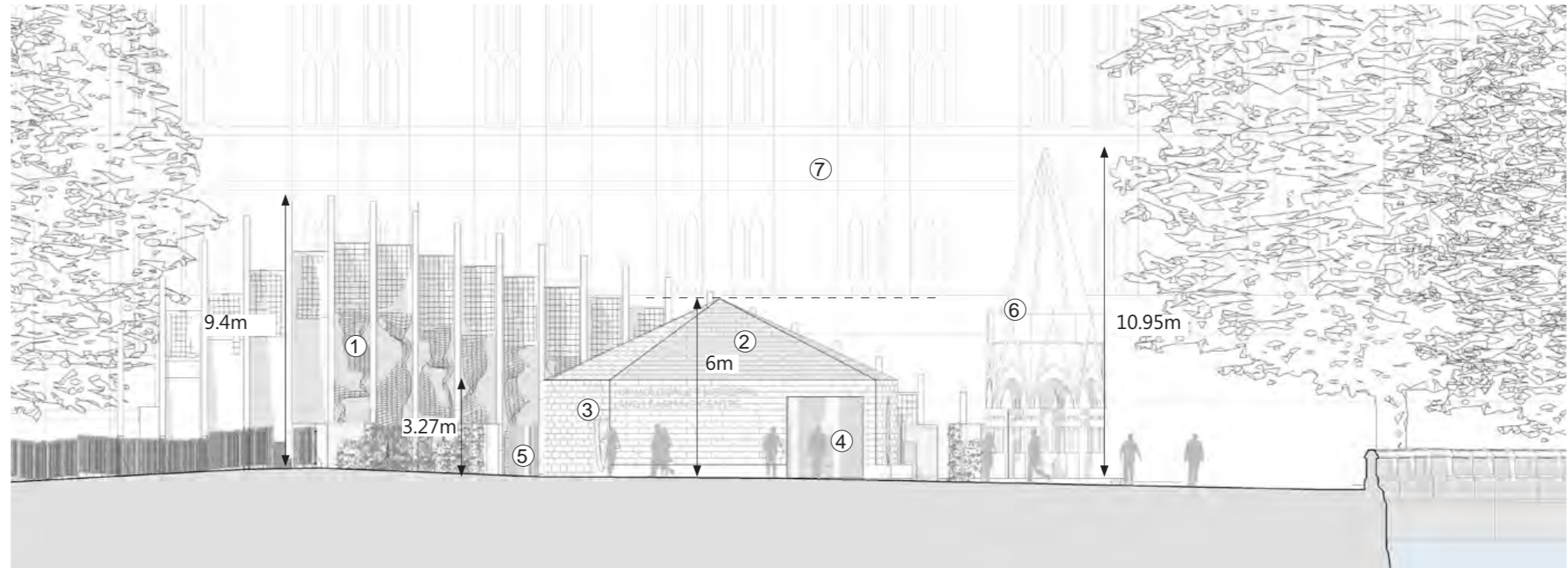
Key:

- 1- Spicer Memorial
- 2- Main Entrance / bag drop off
- 3- Emergency Exit

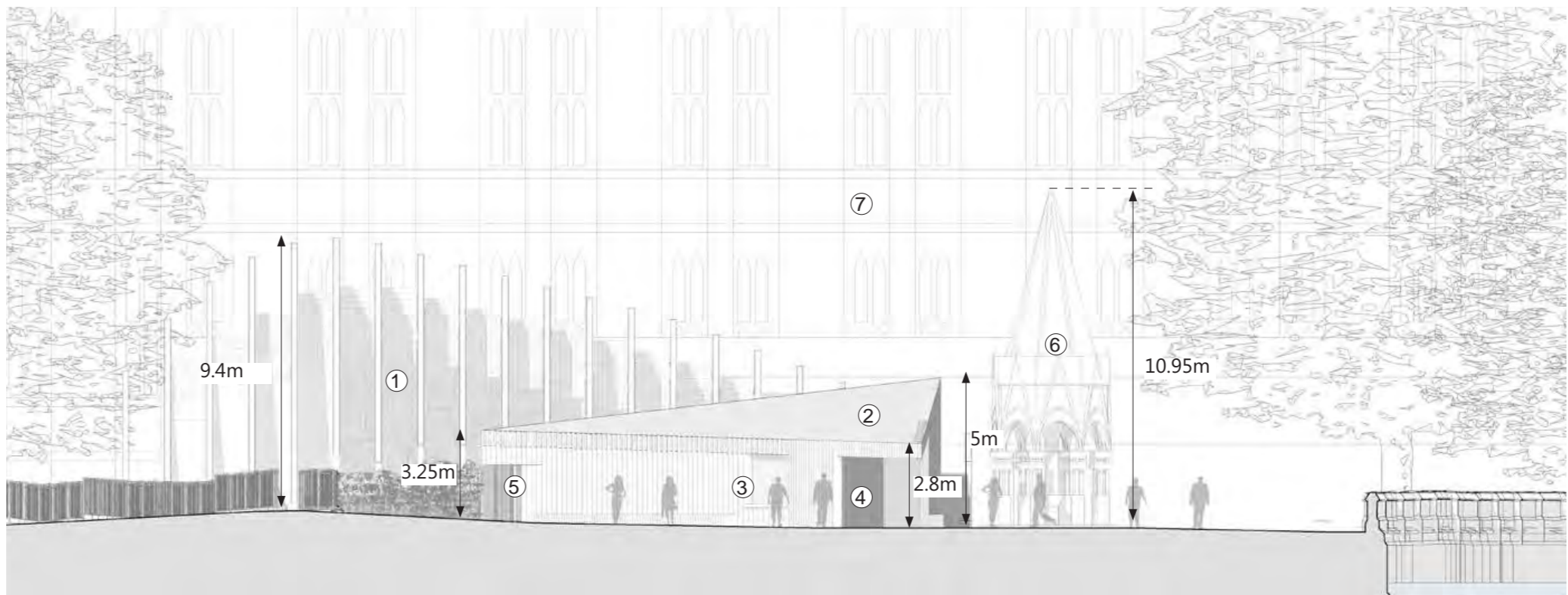
South Elevation



Keyplan



Keyplan



Key:

- 1-Memorial fins
- 2-Entrance pavilion
- 3-Information / bag collection
- 4-Main entrance / bag drop off
- 5-Main Exit
- 6-Buxton memorial
- 7-Houses of Parliament

### Materiality

The material palette used seeks to reinforce the building's relationship with the surrounding area, whilst also taking into consideration technical requirements and the ageing of materials. Therefore, the chosen material is intended to be durable and convey a sense of permanence.

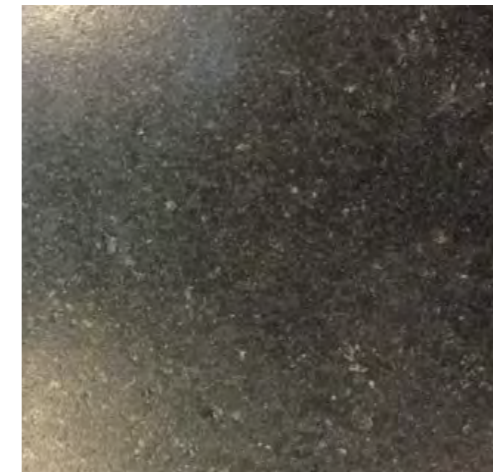
Following these principles and understanding the importance of detail, high-quality materials would be used. Flamed granite is proposed for the floor while a darker honed and waxed granite is proposed for the columns that compose the exterior facade of the Entrance Pavilion. Grey stone will blend with the background and, along with the cast bronze fins, will ensure a toned-down colour scheme as the mood for the proposal, allowing the Parliament in the background to continue to shine as the predominant feature.



Blackened steel - doors to courtyard



Flamed granite - Entrance Pavilion floor



Honed and waxed granite (matching floor) - Entrance Pavilion columns

## 2.3 MEMORIAL COURTYARD

### Design Overview

The Memorial Courtyard was designed as a unique, contemplative space that defines the relationship between the Entrance Pavilion, the Memorial and Learning Centre - a garden within Victoria Tower Gardens. Its positioning and design create an environment where visitors can linger, with a landscape that offers a place of calm reflection before breaching the looming fins and down into the Learning Centre.

Adjustments were made to the Courtyard layout and perimeter to adapt to the new Entrance Pavilion design whilst further considerations were given to provide a simpler and more intuitive layout. Areas of soft landscape and trees were added in order to achieve a more significant relationship to the gardens and create a deeper sense of a "garden within a garden".

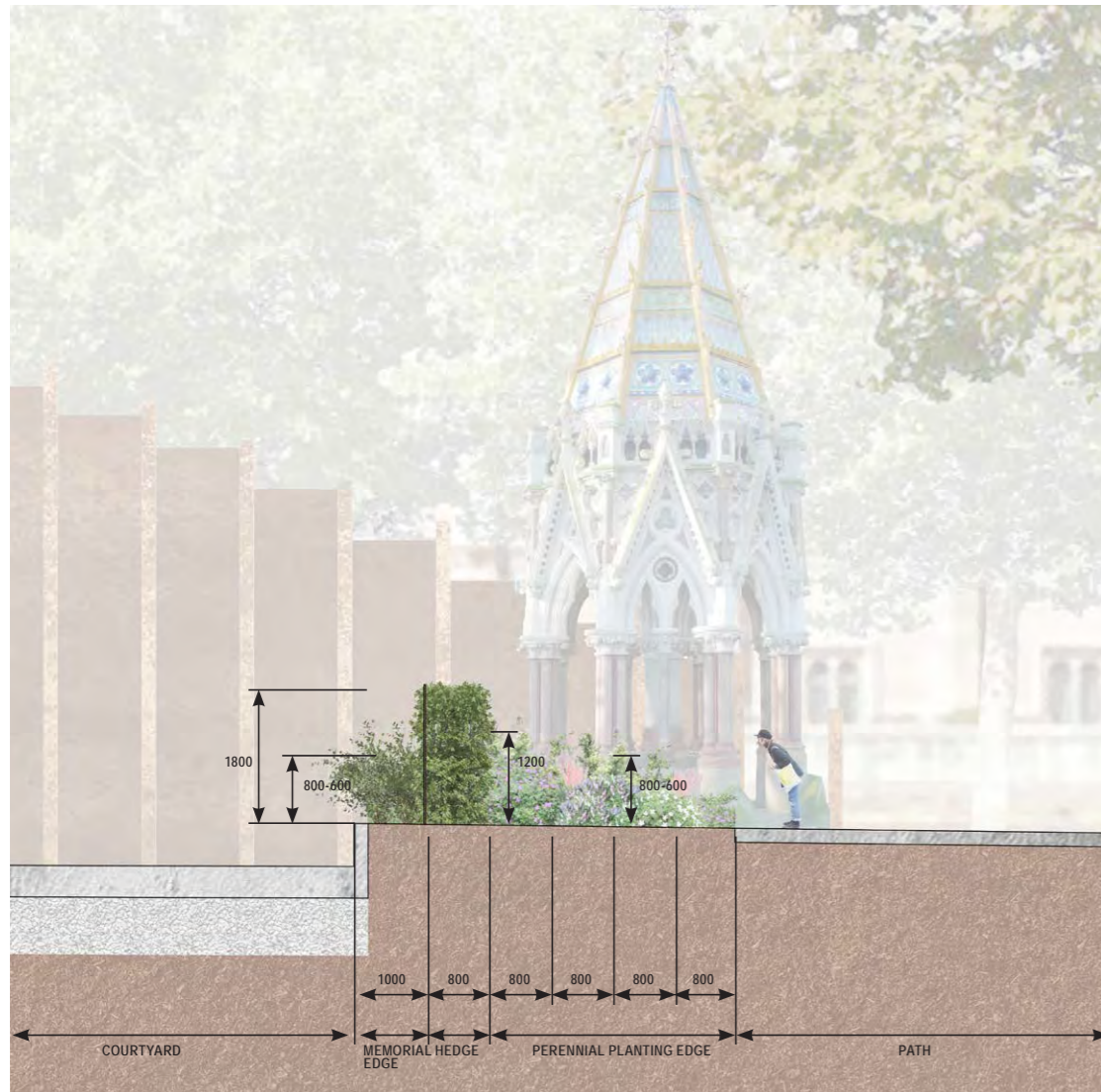


View from the Courtyard looking north towards the Memorial



Courtyard Edge

The perimeter fence was reviewed, particularly the areas around the Buxton Memorial. In these areas the boundary fence was simplified: the 1800mm tall glazed panels were removed and replaced by a 1100mm tall fence that allows a clearer view of the Buxton from Millbank particularly the axis view from Dean Stanley Street towards the gardens.









View looking south toward Buxton Memorial



View from the Courtyard looking north towards the Memorial

**Materials**

The Memorial Courtyard is designed to be paved with grey stone, creating a visual continuity from the Entrance Pavilion; the stone will flow seamlessly from the walls of the Pavilion to the courtyard floor and up the retaining walls.

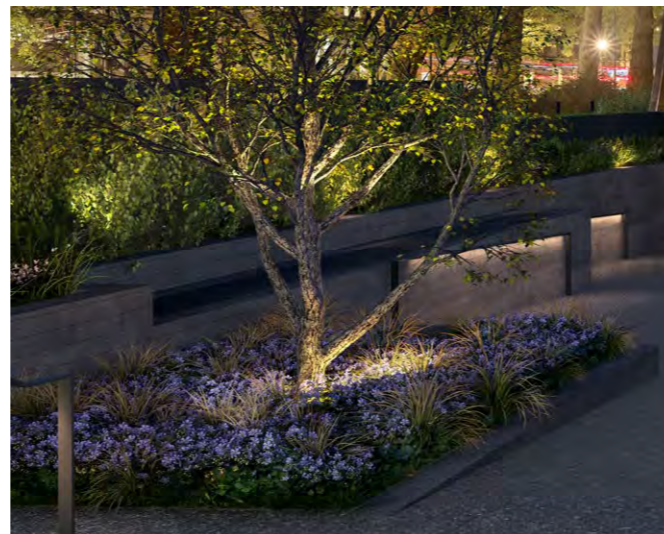
The revised layout does not significantly change the material pallet that was submitted in the December 2018 Application apart from the glass screens around in the Buxton Memorial and on the opposite side of the courtyard that were replaced with low level metal fencing. The removal of the diagonal route has simplified the courtyard floor pattern creating a more intuitive route towards the Memorial fins.



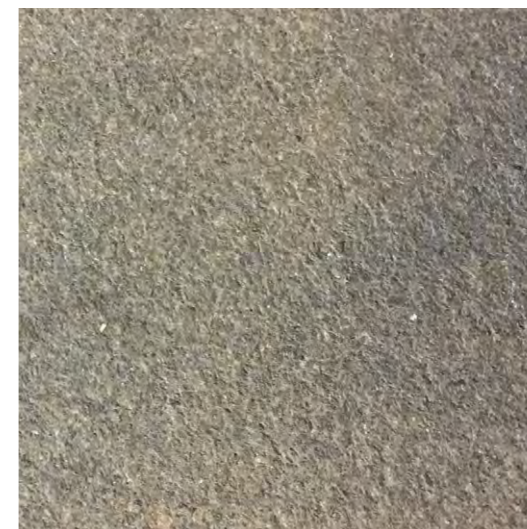
Detail of Courtyard



Detail of perimeter railing and planting



Detail of planting and lighting



Grey stone



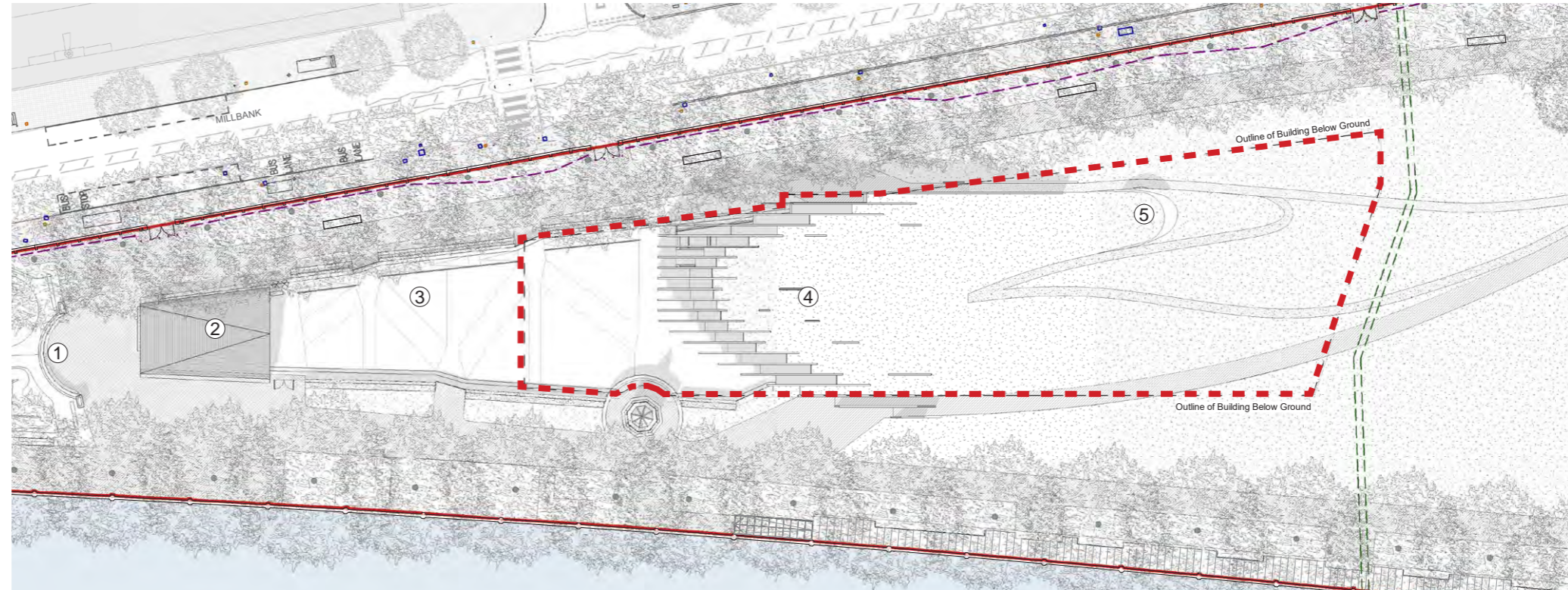
View from Dean Stanley Street

# 2.4 LEARNING CENTRE

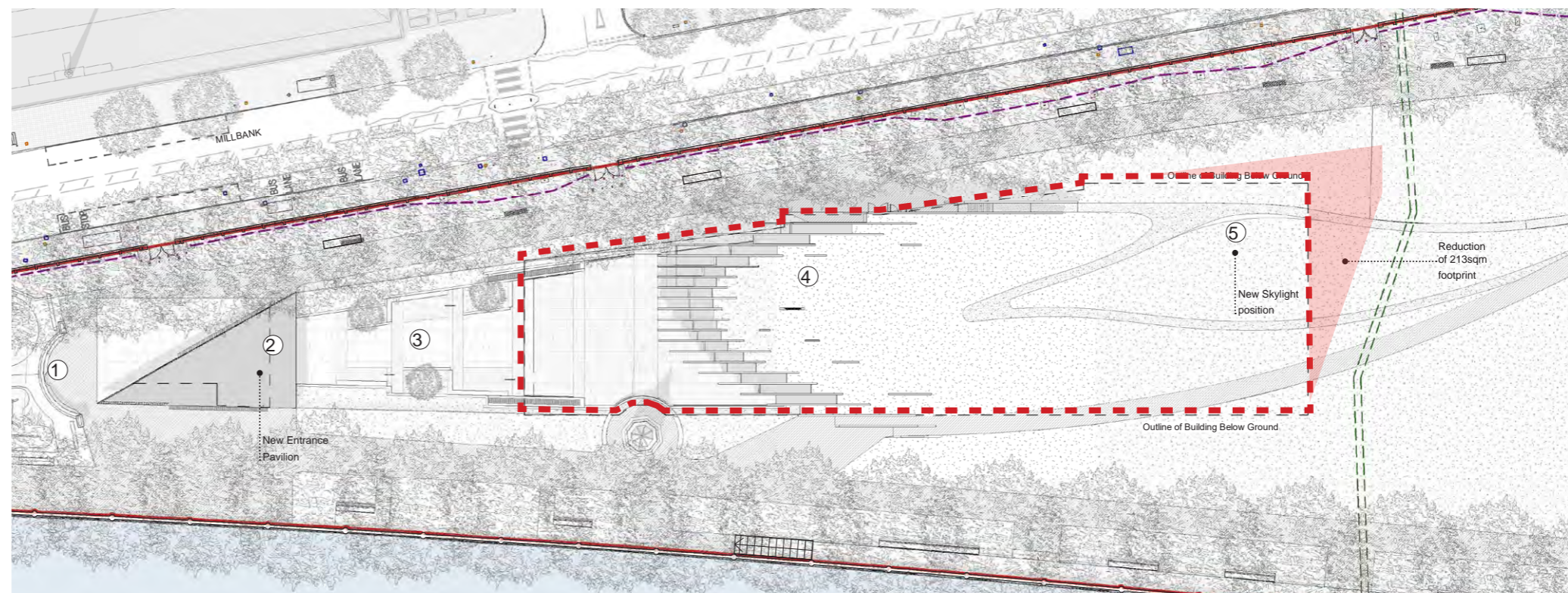
## Site Plan

The Learning Centre footprint was rationalised at the western and northern end, reducing the basement plan by 213sqm, whilst the skylight was relocated further north.

December 2018 Application



April 2019 Amendment



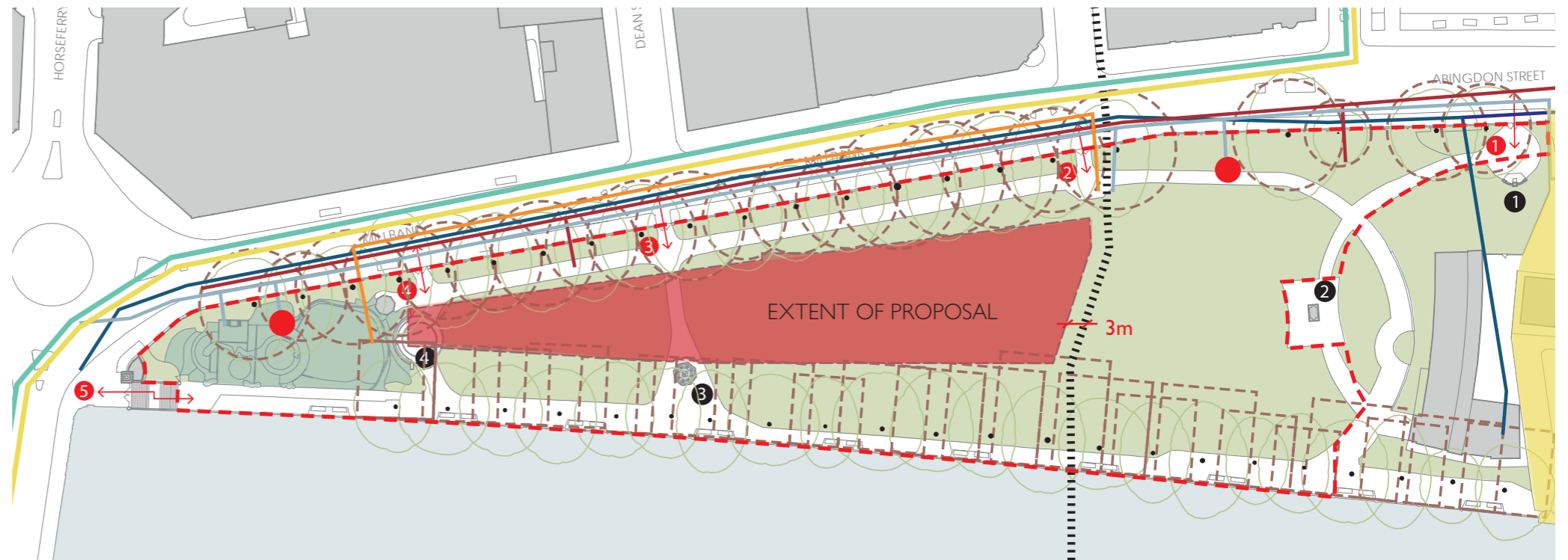
### Key:

- 1-Spicer memorial
- 2-Entrance Pavilion
- 3-Memorial Courtyard
- 4-Memorial Fins
- 5- Skylight

**Site Constraints**

Compared to the December 2018 Application, the new building footprint pulls the building away from the trees at the northwestern end and from the existing Thames Storm Overflow Sewer, by reducing the size of the basement footprint. This also reduces construction time/excavation and improves logistics on site.

**December 2018 Application**



**April 2019 Amendment**



**KEY**

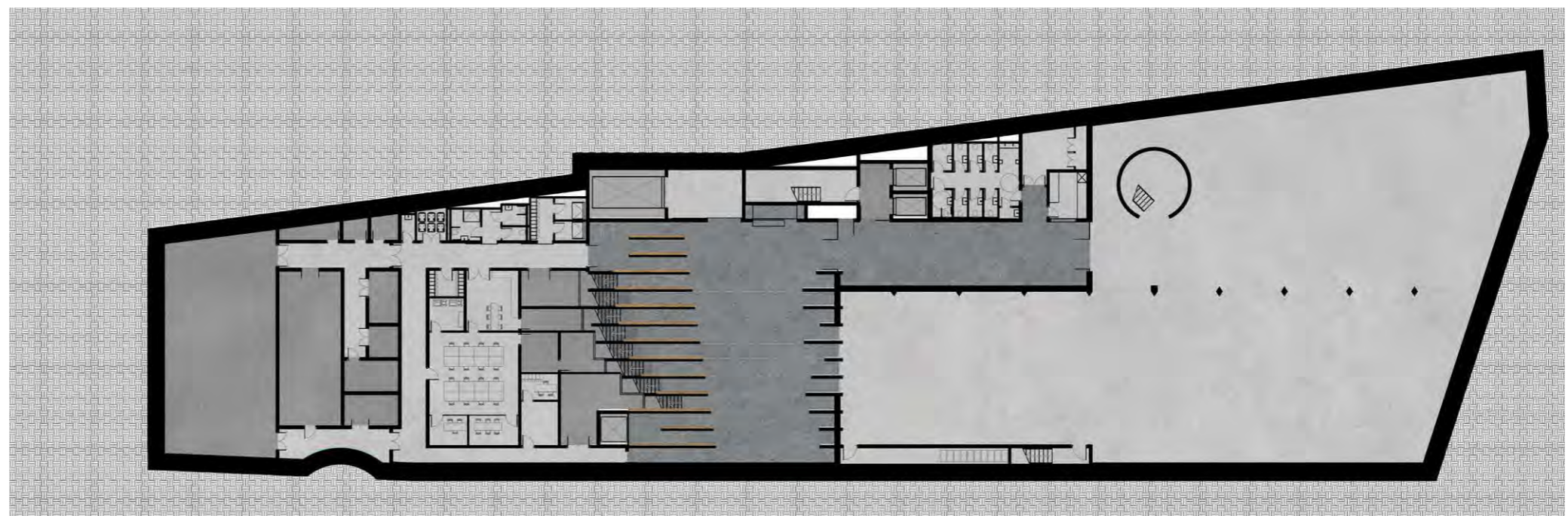
- World Heritage Site
- 1 Emmeline Pankhurst Memorial
- 2 Burghers of Calais
- 3 The Buxton Memorial
- 4 Spicer Memorial
- Westminster Abbey and Parliament Square Conservation Area
- Smith Square Conservation Area
- Low-pressure Gas
- Water Main
- Combined Foul Water
- BT Route
- Hydrant
- Storm water Relief
- Tree Trunk
- Tree Canopy
- Root Protection Area (RPA)

Existing constraints diagram

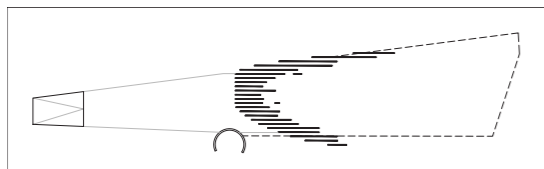
December 2018 Application



December 2018 Learning Centre Long Section 1



December 2018 Learning Centre Basement Floor Plan



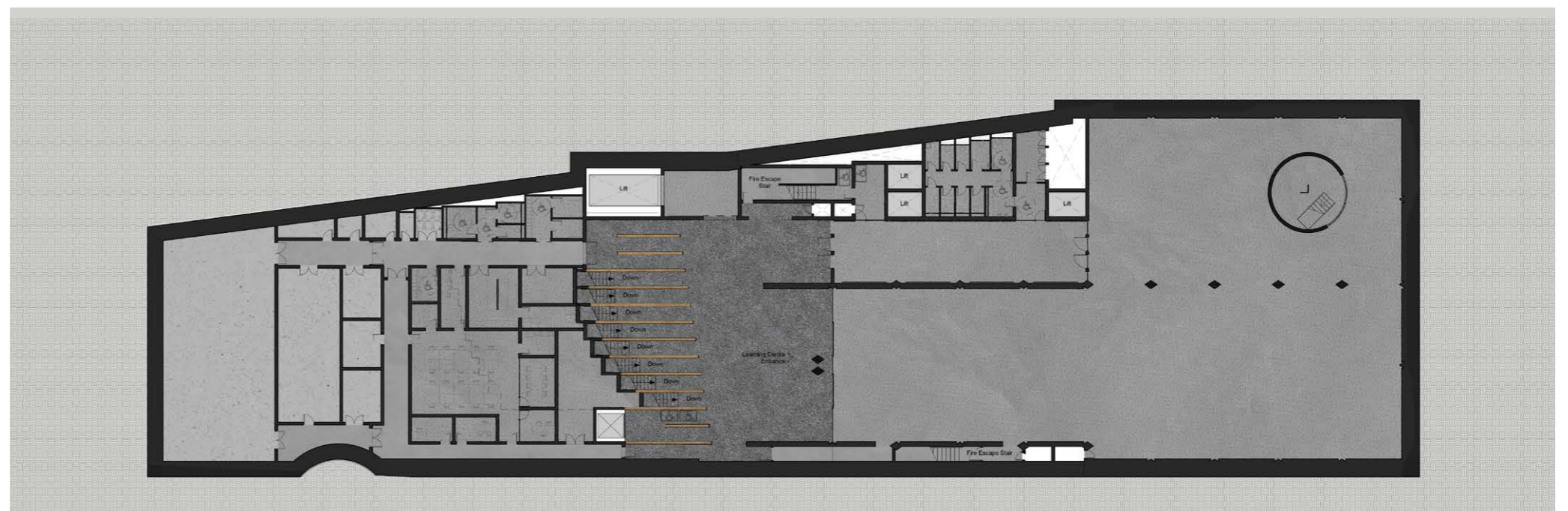
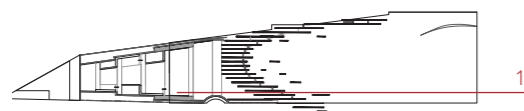


### April 2019 Amendment

The new basement plan is reduced by 213sqm and the skylight has been relocated further north.

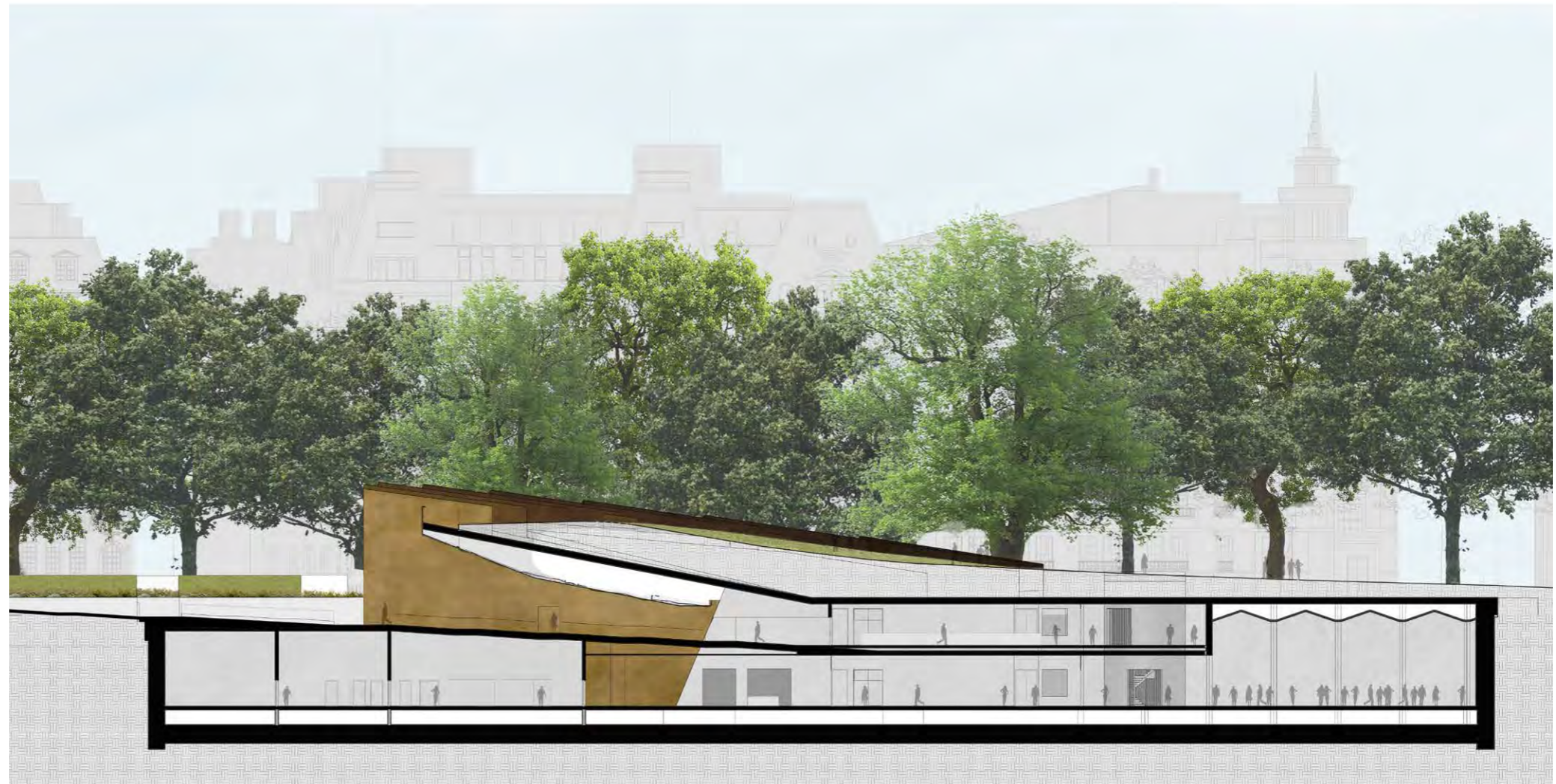


Current Learning Centre Long Section 1

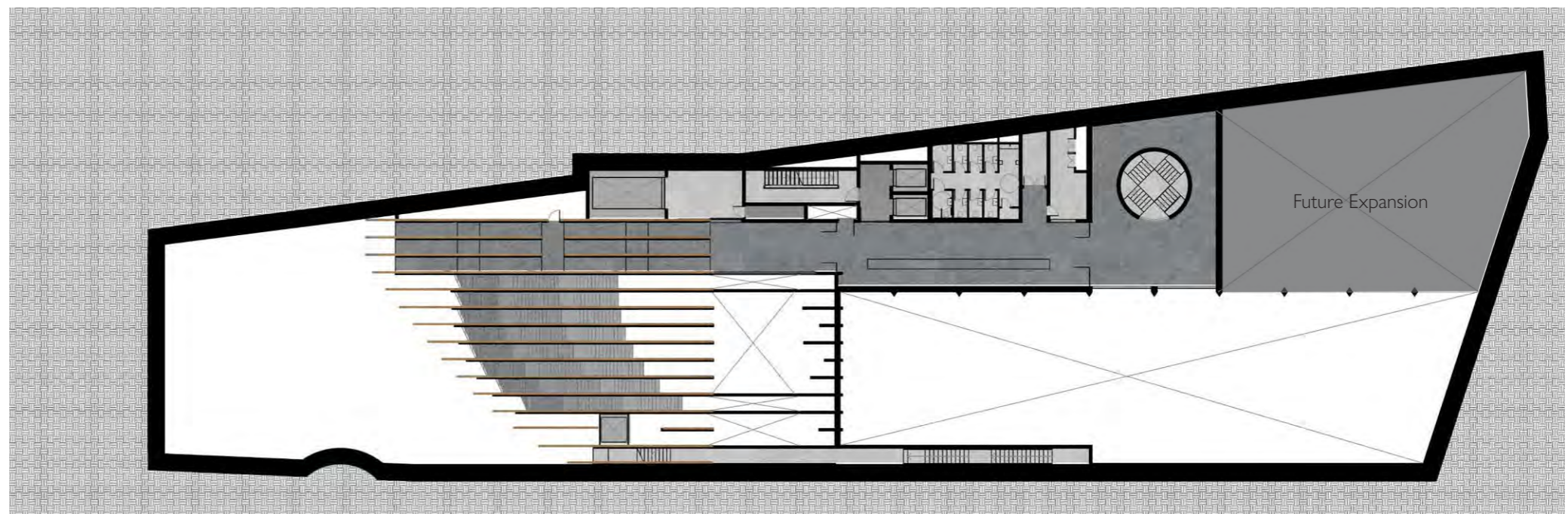


Current Learning Centre Basement Floor Plan

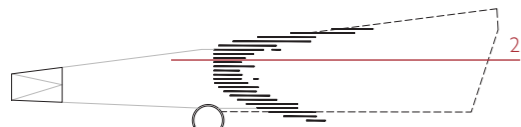
December 2018 Proposal



Learning Centre Long Section 2

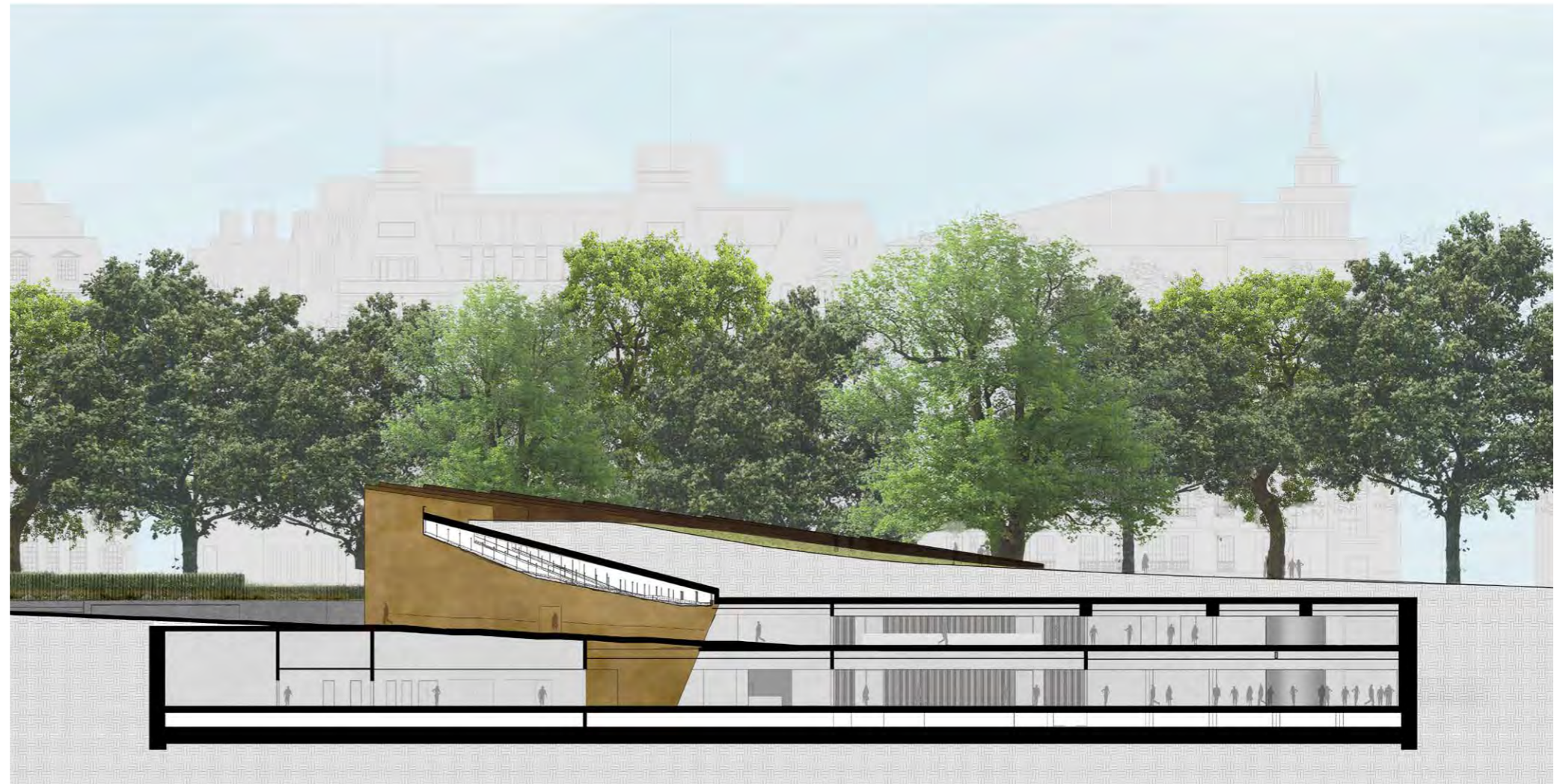


Learning Centre Mezzanine Floor Plan

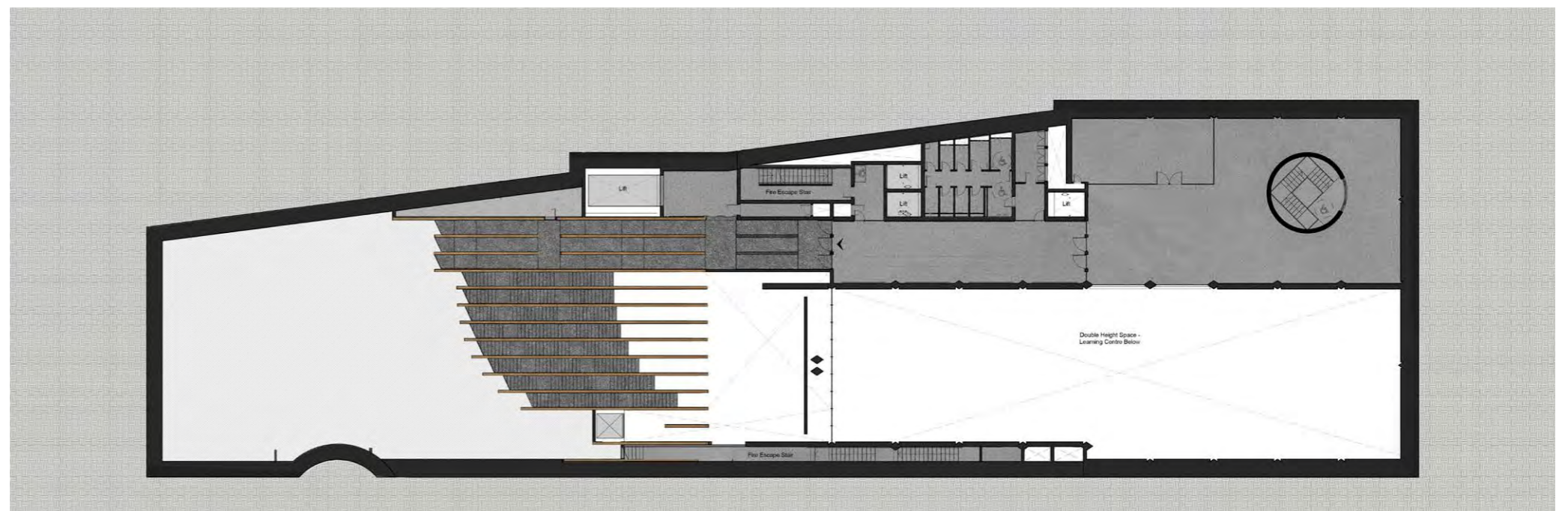


April 2019 Amendment

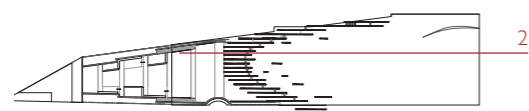
The Mezzanine level was extended by 213sqm in order to maintain the same quantum of floor space required for the exhibition area.



Learning Centre Long Section 2



Learning Centre Mezzanine Floor Plan



VERIFIED VIEWS

3

## MAIN VERIFIED TOWNSCAPE VIEWS

(...) I firmly believe that the proposals will enhance the Grade II Registered Victoria Tower Gardens, and that the significance and OUV of the WHS and of relevant heritage assets will be left unharmed. The design changes provided for the Addendum Application serve to reinforce this assessment.

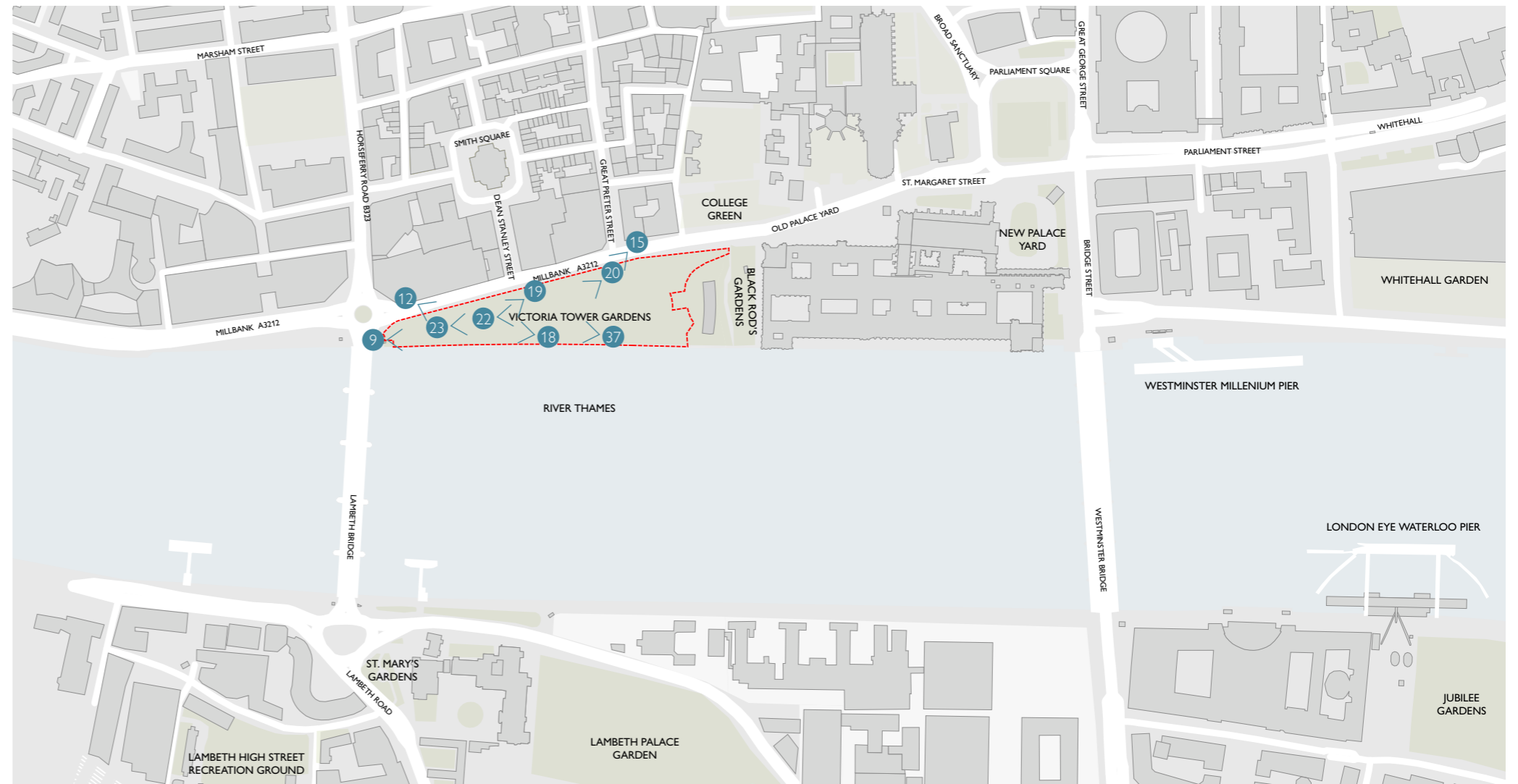
*Text abridged from the Independent Architecture, Heritage and Townscape Addendum Statement by Tavernor Consultancy*

## Verified Views

Verified views are architectural photo-montages which have been created to a high level of verifiable accuracy using collected survey data, precise photography and a strict recorded methodology.

The following section outlines a selection of views taken from the Heritage, Townscape and Visual Impact Assessment that demonstrate how the proposal integrates sensitively in the surroundings.

Please refer to Built Heritage, Townscape and Visual Impact Assessment by Montagu Evans for detailed visual impact analysis.



Viewpoints Location Map

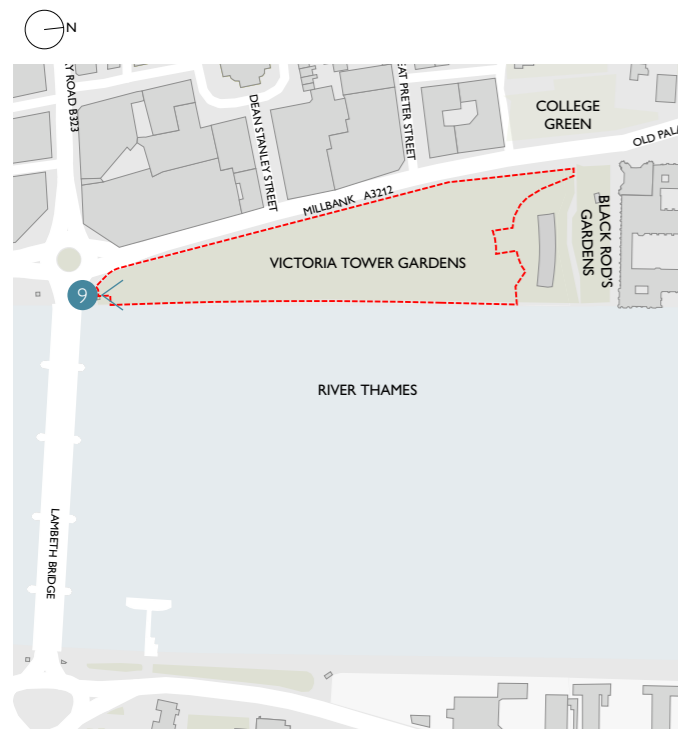
### KEY

- - - Project Boundary
- 1 Viewpoint of Verified View

### List of Verified Views to be considered

- |   |   |                          |   |
|---|---|--------------------------|---|
| 1. LVMF 18 A.2 - Westminster Bridge upstream                          | 6. LVMF 22 A.1 - Albert Embankment opposite the Palace of Westminster | 12. Horseferry Street    | 19. TC2                                       |
| 2. LVMF 18 A.1 - Westminster Bridge upstream                          | 7. LVMF 19 A.2 - Lambeth Bridge downstream                            | 13. Dean Stanley Street  | 20. TC6D                                      |
| 3. LVMF 22 A.3 - Albert Embankment opposite the Palace of Westminster | 8. LVMF 19 A.1 - Lambeth Bridge downstream                            | 14. Great Peter Street   | 21. TC6C                                      |
| 4. LVMF 22 A.2 - Albert Embankment opposite the Palace of Westminster | 9. TC4  | 15. Great College Street | 22. Victoria Tower Gardens                    |
| 5. River Thames   | 10. MI5 (a and b)   | 16. TC6A                 | 23. Southern Extent of Victoria Tower Gardens |
|   | 11. Millbank towards North  | 17. TC3B                 |   |
|   |   | 18. TC3A                 |   |

View 9: TC4



December 2018 Application



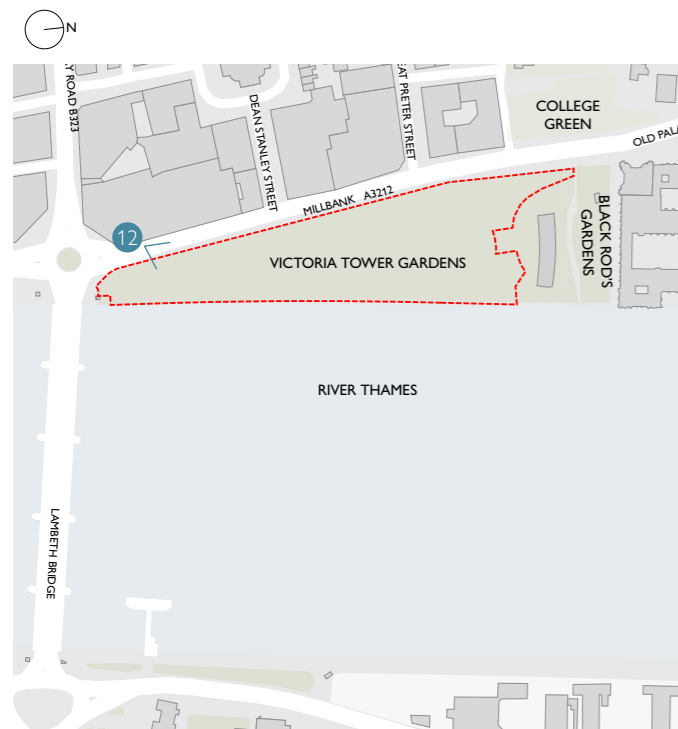
April 2019 Amendment





View 12: Horseferry Road

December 2018 Application

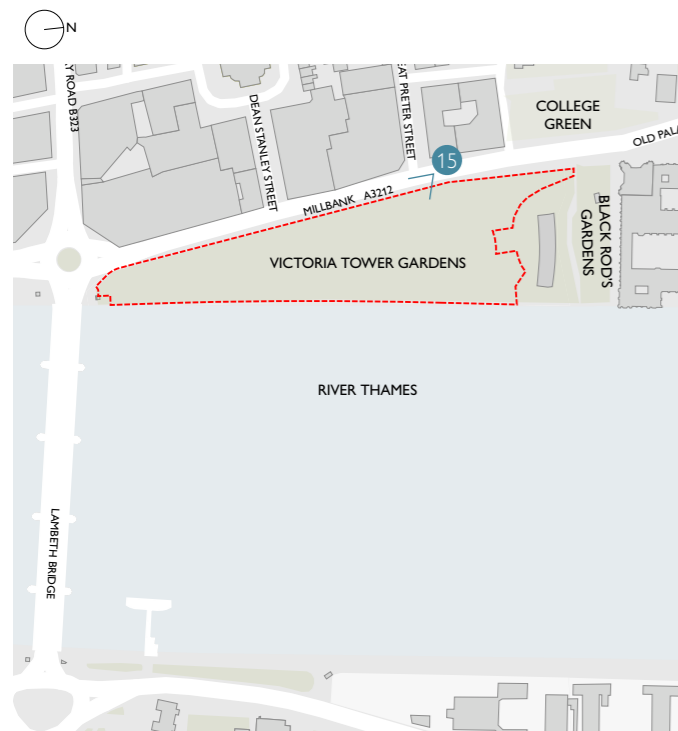


April 2019 Amendment



View 15: Great College Street

December 2018 Application

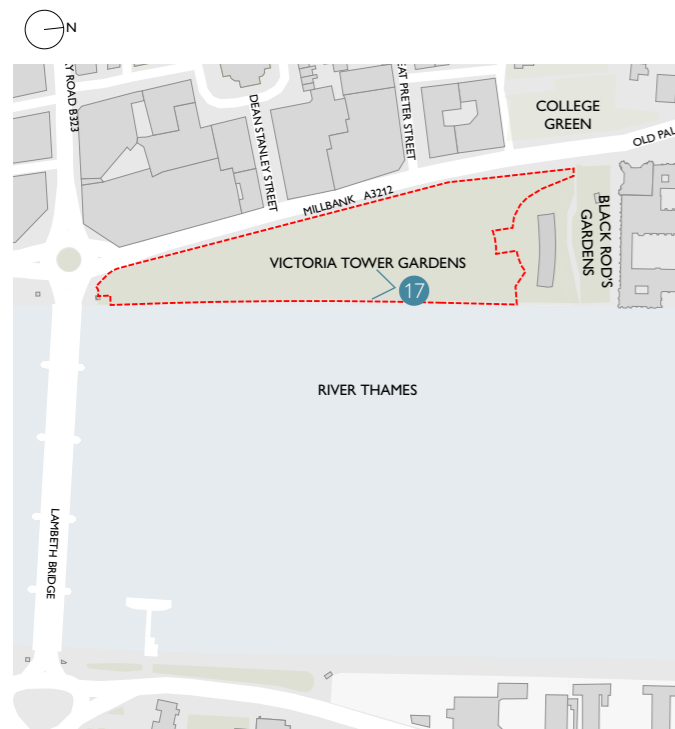


April 2019 Amendment



View 17: TC3B

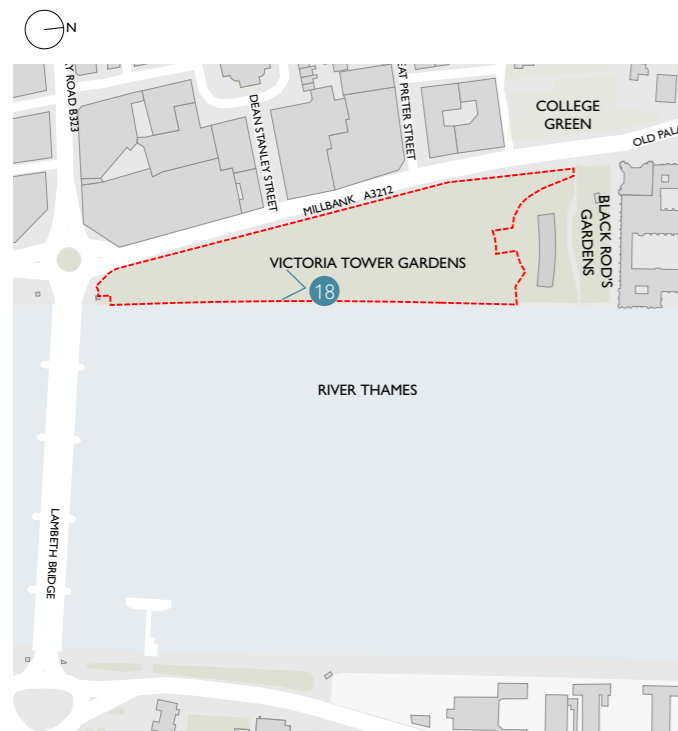
December 2018 Application



April 2019 Amendment



View 18: TC3A - night



December 2018 Application



April 2019 Amendment





View 19: TC2 - day



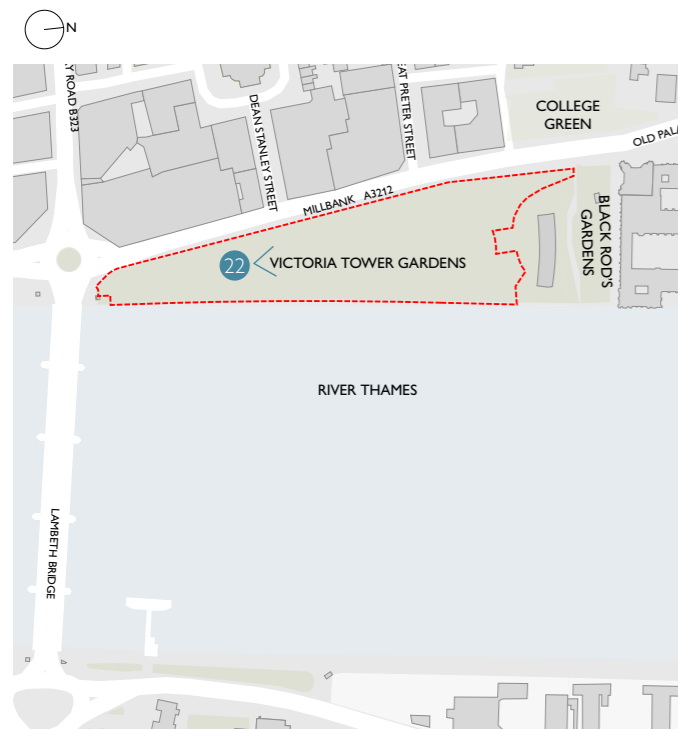
December 2018 Application



April 2019 Amendment



View 22: Victoria Tower Gardens - day



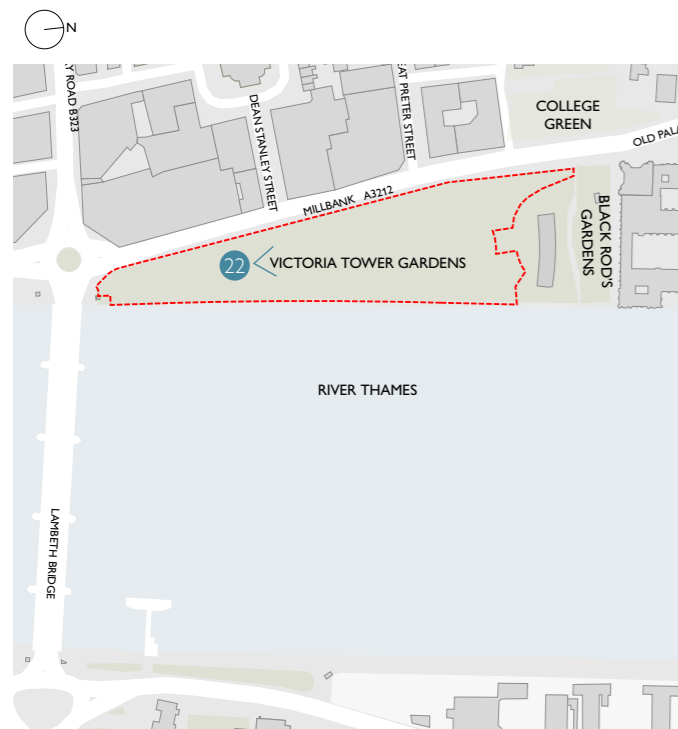
December 2018 Application



April 2019 Amendment



View 22: Victoria Tower Gardens - night



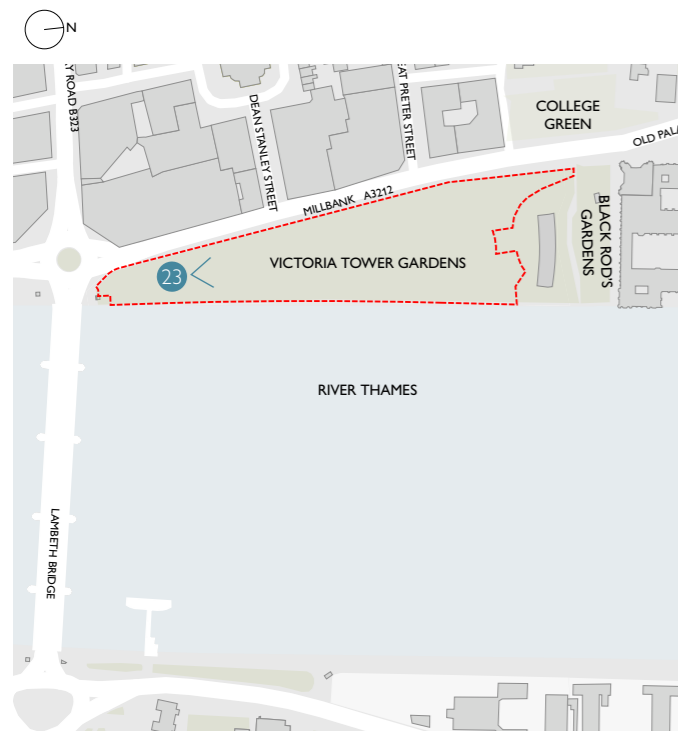
December 2018 Application



April 2019 Amendment



View 23: Southern Extent of Victoria Tower Gardens (35mm lens)

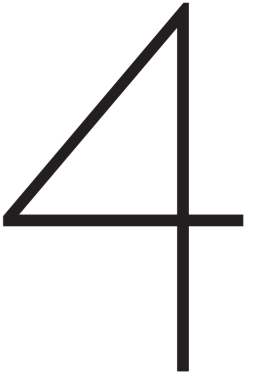




View 23: Victoria Tower Gardens Playground (50mm lens)



# TECHNICAL SUMMARY

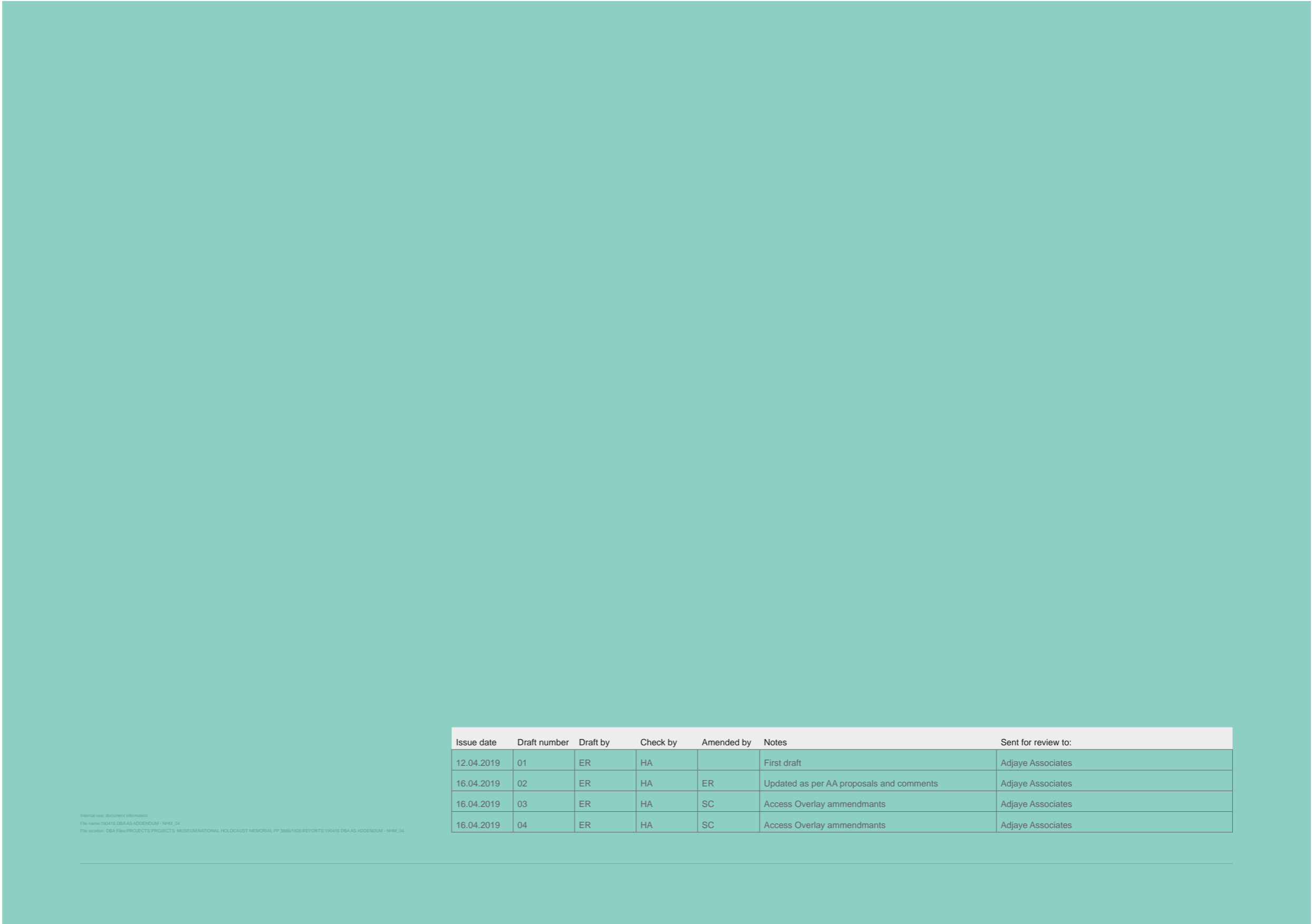


UNITED KINGDOM  
NATIONAL HOLOCAUST MUSEUM

**Access Statement ADDENDUM**

April 2019

DAVID BONNETT ASSOCIATES  
*access consultancy research and design*



| Issue date | Draft number | Draft by | Check by | Amended by | Notes                                    | Sent for review to: |
|------------|--------------|----------|----------|------------|--|---------------------|
| 12.04.2019 | 01           | ER       | HA       |            | First draft                              | Adjaye Associates   |
| 16.04.2019 | 02           | ER       | HA       | ER         | Updated as per AA proposals and comments | Adjaye Associates   |
| 16.04.2019 | 03           | ER       | HA       | SC         | Access Overlay ammendmnts                | Adjaye Associates   |
| 16.04.2019 | 04           | ER       | HA       | SC         | Access Overlay ammendmnts                | Adjaye Associates   |

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**DAVID BONNETT ASSOCIATES**  
*inclusive design consultancy & research*

Studio One  
32 Indigo Mews  
Carysfort Road  
London  
N16 9AE

T 020 7275 0065  
F 020 7275 9035  
E [info@davidbonnett.co.uk](mailto:info@davidbonnett.co.uk)  
W [www.davidbonnett.co.uk](http://www.davidbonnett.co.uk)

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# 1. Introduction

## 1.1 The scheme

The United Kingdom National Holocaust Memorial and Learning Centre (UKNHM) site is located to the west of the Palace of Westminster in the Victoria Tower Gardens and park between Millbank and the Thames.

The proposals under consideration are the result of a national competition won by Adjaye Associates in collaboration with Ron Arad and Gustafson Porter + Bowman.

The project is funded by the British Government and the intention is for the building and surrounding landscaping works to be completed and open to the public in 2021.

## 1.2 Purpose of the report

This Addendum provides an update of the Access Statement prepared by DBA in December 2018 to support a planning application for the UKNHM in the City of Westminster.

The aim of this report is to outline the access strategy arising from the analysis of the changes to the original scheme.

The design changes that have taken place since the submission of the planning application are:

- New entrance pavilion;
- New courtyard layout;
- Rationalization of Learning centre basement footprint;
- Extension of Learning centre mezzanine level; and
- Repositioning of feature stair/lift within exhibition space.

## 1.3 Access aims

The proposed development has been designed to incorporate the following key access principles:

- To maximise inclusive access to all parts of the building for both the public and Back of House staff;
- To ensure that required standards for accessibility are met at the outset and as part of mainstream inclusive design wherever possible;
- To develop proposals that follow design guidance given in relevant British Standards and other currently published good practice guidance about meeting the needs of disabled people;
- To design inclusively which means that people is placed at the heart of the design process to ensure all, regardless of nationality, age, sex or ability can use and enjoy the Memorial facilities.

## 1.4 Method of review

DBA uses 'The journey' method in order to assess how the building design responds to inclusive and independent access starting with arrival at the location and follows a sequential journey through the proposed public realm to the entrance. It progresses through the building entrances, circulation routes and facilities, ending with emergency evacuation.

The Addendum describes how the scheme has been designed with consideration of those visiting the Memorial and Learning Centre and people working at the UKNHM with Special needs, including:

- People with impaired mobility, sensory impairments and cognitive abilities;
- Families with young children;
- Elderly people;
- Non English speaking tourists from outside the UK.

The report does not describe or evaluate any part of the development that is used solely for inspection, repair or maintenance of any service or fitting, in accordance with Approved Document M. If a disabled person requires access to these areas as part of their work then their employer is expected to take all reasonable steps to ensure that there are no

barriers to them carrying out their work. Any building adjustments that are required would be carried out at that time.

### Note:

DBA provides guidance and advice as access consultants. The consultancy does not officially approve designs, nor does it provide confirmation that a design complies with statutory standards. This remains the responsibility of the designers and the approvals authority.

## 1.5 The standards and policy

Access standards are in a continuing state of development because of changing needs, expectations and legislation. The nature of these changing needs and standards can result in anomalies and contradictions. Therefore it is important that access and inclusivity are considered and refined throughout the design process.

A list of references and a description of relevant legislation, regulations, standards and guidance are detailed in Appendix 1.

## 1.6 The Equality Act

The Equality Act 2010 (EA) obliges service providers and employers to consider barriers created by physical features in their buildings. It combines and supersedes previous separate discrimination legislation (including the Disability Discrimination Act 1995. (Refer to Appendix 1 for a fuller description and explanation).

It is important that the client and project team recognise that Planning or Building Control approval of proposed works does not necessarily indicate compliance with duties under the EA as this does not specify standards. Management and efficient operation of the building facilities is a key factor in assuring inclusive access is achieved.

DBA recommend pragmatic and well thought out solutions that create a fully inclusive environment as the key process to follow as opposed to a rigid adherence to prescribed minimum standards.

## **1.7 Conclusions**

Each aspect of arriving, entering and using the building has been carefully considered during the design process in terms of inclusive design.

DBA has reviewed the proposed changes against the original scheme and concluded that the proposed amendments have not significantly changed the access provisions within the Access Statement submitted under original planning application in December 2018.



## 2. Accessibility of the proposed changes

This section analyses the accessibility of the changes that have taken place since the submittal of the planning application. Please refer to the original Access Statement for the analysis of the complete scheme.

### 2.1 Entrance Pavilion

The design team has developed a new design for the Entrance Pavilion with the intent of making it a lighter, more transparent element which enhances and harmonizes with the existing gardens. The access provisions, including a wheelchair-accessible WC for reception staff, have been maintained.

Entry into the UKNHM will be through the Entrance Pavilion where visitors will pass security checks and where there will be lockers to store bags. Counters for dropping and collecting bags will be designed so that they meet the provisions of AD Part M and guidance from BS8300.

Circulation through the Pavilion will allow wheelchair users and ambulant disabled people to move safely and comfortably. All routes will be step-free, and the door into the Pavilion and one of the doors into the courtyard will be automated to facilitate entry/exit the Pavilion.

It is expected that people will book tickets online.

### 2.2 Memorial Courtyard

The route to the Learning Centre from the Entrance Pavilion will be across the Memorial Courtyard towards the Memorial Fins at a lower level. The change in level between the Entrance Pavilion and the Memorial fins will be 2m over a distance of 50 metres.

The Memorial Courtyard layout has been reviewed and developed so that it relates to the new Entrance Pavilion.

The Memorial Courtyard is designed as a 'contemplative' gently sloping terrace that addresses the change of level. There will be 6 slopes of approx. 6.5 m long at 1:21 gradient, with level landings of 1500mm long every 330mm change of level.

Each intermediate landing will have a level area on one side where benches will be provided so people can rest when ascending/descending the courtyard.

These level areas will have two steps at the end to reach the next intermediate landing of the slope. The steps will be designed in accordance with AD Part M and the guidance of BS8300.

Careful consideration will be made at the next design stage so that suitable visual warning is provided to prevent people tripping on the edge between the slopes and the level areas.

### 2.3 Learning Centre

The design development has incorporate changes to the Learning Centre:

- Rationalization of Learning centre basement footprint;
- Extension of Learning centre mezzanine level; and
- Repositioning of feature stair/lift within exhibition space.

The main space of the Learning Centre is located at basement level and there will be additional space at the mezzanine level. The design of the exhibition spaces will be developed at a later stage by a specialist. Consideration will be made to ensure that the displays are accessible to all.

Access to the Learning Centre at the basement level will be via two oversized automated sliding doors. All thresholds will be accessible.

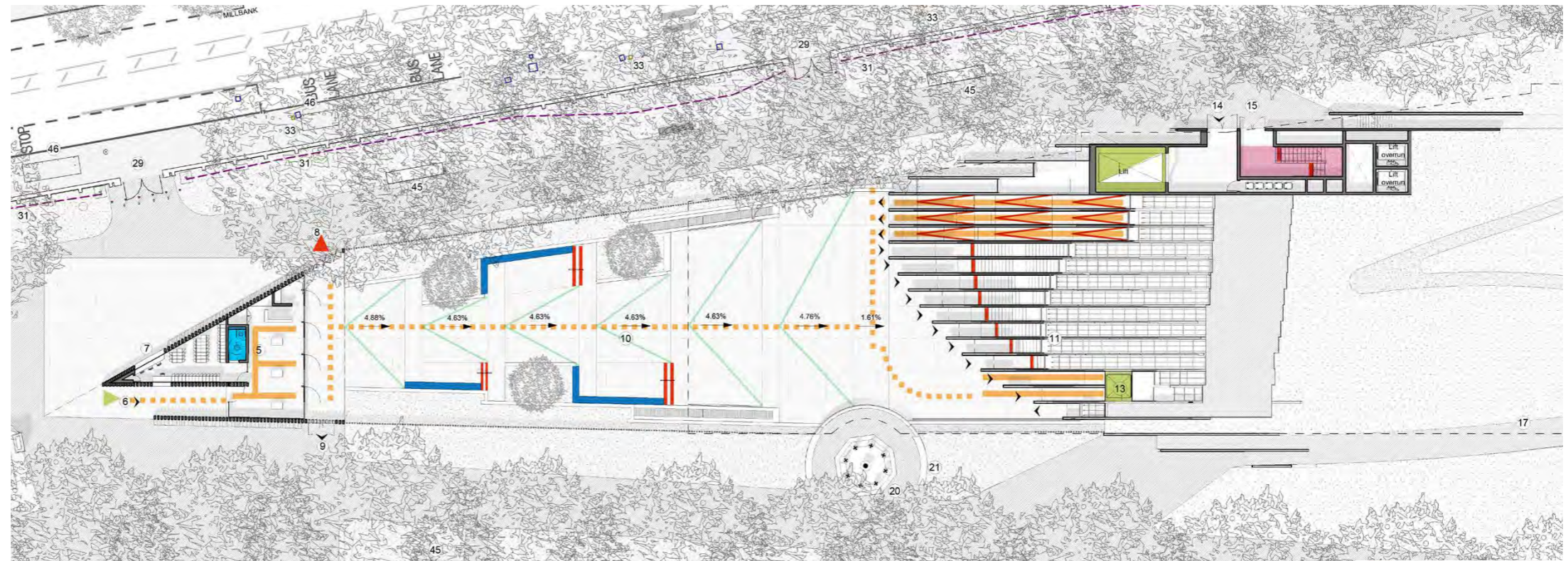
Access to the mezzanine level will be via a feature circular stair, which has been repositioned in order to provide a better connection in the exhibition space between the basement and the mezzanine level, and a passenger lift, which has been repositioned next to the exit doors of the Learning centre.

Alternatively there will be two additional passenger lifts located within the lobby.

Passenger lifts will have a capacity of 17 persons. Further details of the lifts and stairs will be designed to meet AD Part M and BS8300.

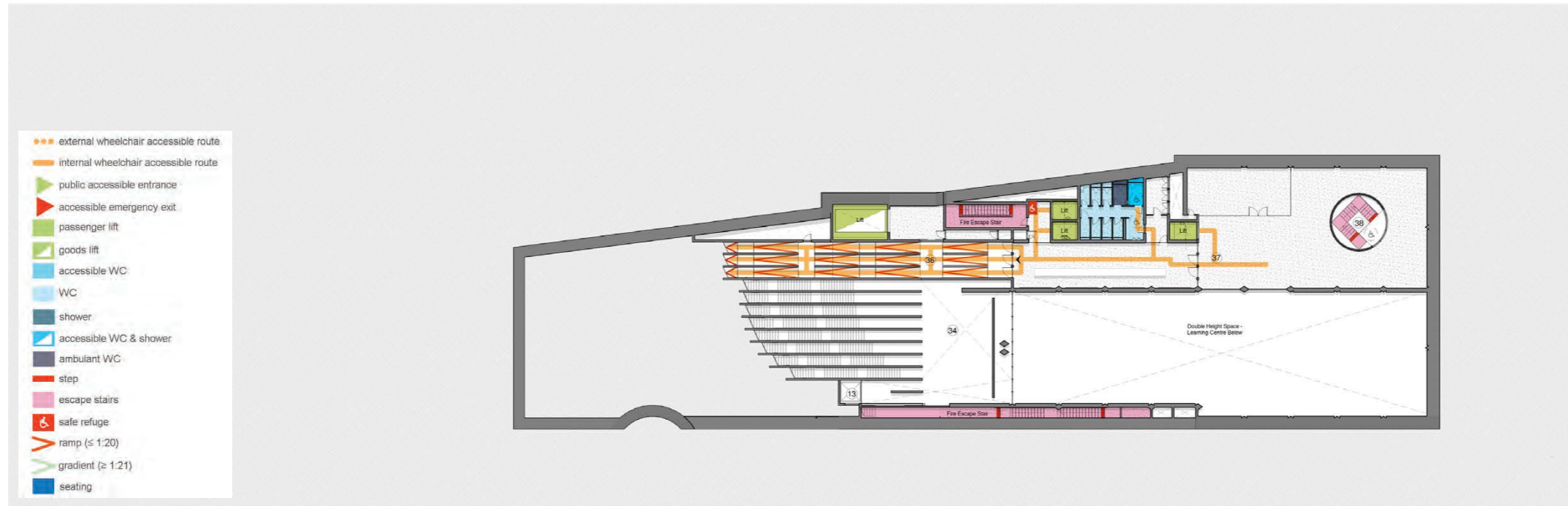
All internal doors will provide a minimum clear opening width of 800mm through a single leaf door, or one leaf of a double leaf doors.

Internal circulation, doors, visual contrast, will be developed at a later design stage and designed in accordance to AD Part M and BS8300.



Ground Floor Plan

- external wheelchair accessible route
- internal wheelchair accessible route
- public accessible entrance
- accessible emergency exit
- passenger lift
- goods lift
- accessible WC
- WC
- shower
- accessible WC & shower
- ambulant WC
- step
- escape stairs
- safe refuge
- ramp (≤ 1:20)
- gradient (≥ 1:21)
- seating



Proposed Mezzanine Floor Plan



Proposed Basement Floor Plan

## Appendix 1 | References for inclusive design

### Legislation

#### Equality Act 2010

The Equality Act 2010 ('the Act') combines and supersedes previous separate discrimination legislation (including the Disability Discrimination Act 1995 as amended ('the DDA') and the disability discrimination provisions of SENDA 2001 for England, Wales and Scotland. People are protected from discrimination and harassment based on 'protected characteristics'; victimising anyone as a result of action taken in connection with the Act is also unlawful. There are nine different protected characteristics under the Act which have different levels of protection depending on the context (such as employment, provision of goods and services or the provision of education). This Access Statement focuses on the protected characteristic of disability; the definition of disability is essentially the same as under the DDA.

The types of discrimination that can arise in relation to disability are:

- Direct disability discrimination;
- Indirect disability discrimination;
- Treating disabled people unfavourably because of something arising in consequence of their disability without justification; and
- A failure to make reasonable adjustments for disabled people ('the RA duty'). The RA duty works in different ways depending on who requests the reasonable adjustments to be made, for example an employee or a member of the public.

The Act also provides protection for people who are treated less favourably because of their relationship with a disabled person (such as a carer) or for people treated less favourably because they are

mistakenly believed to be disabled. A disabled person can always be treated more favourably than a non-disabled person.

If an employer is a listed public authority (such as a local authority) they will be subject to the public sector equality duty. If the employer is not a public authority but carries out a public function as part of its work, it will be covered by the general part of the equality duty in relation to the exercise of that function.

The public sector equality duty seeks to promote equality from within an organisation and the general duty requires the organisation to have due regard to the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by the Act;
- Advance equality of opportunity between persons who share a relevant protected characteristic and those who do not; and
- Foster good relations between persons who share a protected characteristic and those who do not.

Due regard must be given to these three aims when undertaking procurement and to comply with procurement law, consideration must be given to the extent to which equality considerations are relevant and proportionate to the subject matter of the contract.

Most of the listed public authorities are also subject to the specific duty (which operates slightly differently in England and Wales). This involves reporting requirements to demonstrate compliance with the three aims of the general duty. The public sector equality duties are relevant both to the design and the management of the built environment.

#### The Reasonable Adjustment Duty and specific building provisions

The Equality Act does not contain any specific requirements for the built environment and therefore has no relevance to 'compliance' in respect of physical building standards.

#### Statutory Consents

When considering a reasonable adjustment to a physical feature, the Act does not override the need to obtain consents such as planning permission, building regulations approval, listed building consent, scheduled monument consent and fire regulations. If the consent is not given, there is still a duty to consider a reasonable means of avoiding the feature.

- Planning Act 2008, HMSO, 2008.
- Disability Discrimination Act 2005, HMSO, 2005.
- The Chronically Sick and Disabled Persons Act 1970, Department of Health, 1970.
- Regulatory Reform (Fire Safety) Order, 2005.

## Standards and Policy

### Building Regulations 2010

- *The Building Regulations 2010, Approved Document M (Access to and use of buildings) Volume 2: Building other than dwellings*, HM Government, 2015 edition.
- *The Building Regulations 2010, Approved Document K (Protection from falling, collision and impact)*, HM Government, 2013 edition.
- *The Building Regulations 2010, Approved Document B (Fire safety) Volume 2: Buildings other than dwellinghouses*, HM Government, 2006 edition incorporating 2007, 2010 and 2013 amendments.

The Regulations make clear that designs other than those shown in the document can be approved if they are justified as being equally or more effective. Approval confers acceptance that the building meets the regulations in respect of physical access for disabled people.

### National Planning Policy

- *National Planning Policy Framework (NPPF)*, Department for Communities and Local Government, 2012.

The NPPF states that all developments should be designed to be inclusive and that this should be addressed by local policies.

A revised National Planning Policy Framework was published on 24 July 2018.

- *Town and Country Planning (Development Management Procedure) (England) Order 2015*, Article 9.

### London Planning Policy

- *The London Plan: Spatial Development Strategy for Greater London consolidated with alterations since 2011*, Mayor of London, March 2016.

The London Plan (2016) comprises the development plan at the regional level. Relevant policies relating to access and design standards are summarised in the Standards section below.

#### Emerging policy:

- *The London Plan, The Spatial development Strategy for Greater London - Draft for public consultation December 2017*, Mayor of London

#### Supplementary Planning Guidance:

- *Shaping Neighbourhoods Accessible London: Achieving an Inclusive Environment, Draft Supplementary Planning Guidance April 2014*, London Plan 2011 Implementation Framework, Mayor Of London, 2014.

This London Plan SPG outlines an approach for delivering and implementing inclusive access. It includes principles, policies and processes for achieving inclusive design in London.

### Local Policy

- *Westminster's City Plan (Consolidated with all changes since November 2013)*, November 2016, City of Westminster

## References

### British Standards

- *British Standard 8300-1:2018 Design of an accessible and inclusive built environment, Part 1: External environment - Code of Practice*, British Standards Institution, 2018.
- *British Standard 8300-2:2018 Design of an accessible and inclusive built environment, Part 2: Buildings - Code of Practice*, British Standards Institution, 2018.
- *BS 9999:2008 Code of practice for fire safety in the design, management and use of buildings*, British Standards Institution, 2008.
- *BS 5656-2:2004 Safety rules for the construction and installation of lifts. Particular applications for passenger and goods passenger lifts. Accessibility to lifts for persons including persons with disability*, British Standards Institute, 2004.
- *DD CEN/TS 15209:2008 Tactile paving surface indicators produced from concrete, clay and stone*, British Standards Institution, 2008.
- *BS 7997:2003 Products for tactile paving surface indicators*, British Standards Institution, 2003.
- *BS 5395-1:2010 Stairs. Code of practice for the design of stairs with straight flights and winders*, British Standards Institution, 2010.
- *BS 7000-6:2005 Design Management Systems. Managing inclusive design. Guide*, British Standards Institution, 2005.
- *BS 5499-4:2013 Safety signs. Code of practice for escape route signing*, British Standards Institution, 2013.

- *BS 8501:2002 Graphical symbols and signs. Public information symbols*, British Standards Institute, 2002.
- *BS EN 81-28:2003, Safety rules for the construction and installation of lifts. Remote alarm on passenger and goods passenger lifts*, British Standards Institution, 2003.
- *BS EN 81-41:2010, Safety rules for the construction and installation of lifts. Special lifts for the transport of persons and goods. Vertical lifting platforms intended for use by persons with impaired mobility*, British Standards Institution, 2010.
- *BS EN 81-70:2003, Safety rules for the construction and installation of lifts. Particular applications for passenger and goods passenger lifts. Accessibility to lifts for persons including persons with disability*, British Standards Institution, 2003.

#### International Standards

- *ISO 7176-28:2012, Wheelchairs - Part 28: Requirements and test methods for stairclimbing devices*, British Standards Institution, 2012.
- *ISO 9386-1:2000, Power-operated lifting platforms for persons with impaired mobility*, British Standards Institution, 2000.

#### Access Statements

- *Guidance on Information Requirements and Validation*, Department for Communities and Local Government, 2010.
- *Design and Access Statements: How to Write, Read and Use Them*, Commission for Architecture and the Built Environment (CABE), 2006.
- *Planning and Access for Disabled People*, ODPM, 2003.

#### Sanitary Accommodation

- *Good Loo Design Guide*, CAE, RIBA Enterprises, 2004.
- *Changing Places: the practical guide*, Changing Places Consortium, n.d.
- *BS6465-1: 2006 Sanitary installations. Code of practice for the design of sanitary facilities and scales of provision of sanitary and associated appliances*, British Standards Institution, 2009.

#### Urban Design / External Environment / Landscape / Transport

- *Inclusive Mobility: A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure*, Oxley P., Department for Transport, 2002.
- *Improving Walkability: Good Practice Guidance on Improving Pedestrian Conditions as Part of Development Opportunities*, Transport for London, 2005.
- *Guidance on the Use of Tactile Paving Surfaces*, Department for Transport 2007.
- *Traffic Advisory Leaflet 5/95 Parking for Disabled People*, Department for Transport, 1995.
- *Planning Policy Guidance 13: Transport*, Department for Communities and Local Government, 2011.
- *Shared Space: Local Transport Note 1/11*, Department for Transport, 2011.
- *Home Zone Design Guidelines, 1-3.9*, Institute of Highway Incorporated Engineers, 2002.
- *Designing for Disabled People in Home Zones*, JMU Access Partnership, 2007.

- *Inclusive Design for Getting Outdoors I'DGO*, [online] <http://www.idgo.ac.uk/>, 2011.
- *Inclusive urban design: Streets for life*, Architectural Press, 2006.
- *Inclusive Urban Design: A guide to creating accessible public spaces*, David Bonnett Associates, BSI, 2013.
- *London Cycling Design Standards*, TfL, 2014.

#### Signage, Lighting And Wayfinding

- *The Colour, Light and Contrast Manual: Designing and Managing Inclusive Built Environments*, Bright, K., Cook, G., Wiley-Blackwell, 2010.
- *Sign Design Guide: a guide to inclusive signage*, JMU and the Sign Design Guide, 2000.

#### Buildings

- *Designing for Accessibility*, Lacy A., CAE/RIBA Publishing, 2004.
- *Inclusive Design Toolkit*, London Development Agency, 2009.
- *Building Sight: a Handbook of Building and Interior Design Solutions to Include the Needs of Visually Impaired People*, Barker, Barrick and Wilson, RNIB/HMSO, 1995.

#### Arts and Culture

- *Museums and Art Galleries*, Adrian Cave, RIBA Publishing, 2007.
- *Technical Standards for Places of Entertainment*, Entertainment Technology Press, 2013.

# 4.2 INDEPENDENT ARCHITECTURE, HERITAGE & TOWNSCAPE STATEMENT

1

Tavernor

## **Independent Architecture, Heritage & Townscape Statement**

Professor Robert Tavernor, Tavernor Consultancy

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### **United Kingdom Holocaust Memorial and Learning Centre**

Victoria Tower Gardens, Westminster, London SW1P 3JU

### **Independent Architecture, Heritage & Townscape Statement Addendum, April 2019**

Professor Robert Tavernor, Tavernor Consultancy

### **On Behalf of the Ministry of Housing, Communities and Local Government**



**1.0 Executive Summary**

- 1.1 My name is Professor Robert Tavernor, BA, DipArch, PhD, RIBA and I am a founding director of the Tavernor Consultancy Limited, which provides consultancy advice on architecture, urban design and built heritage.
- 1.2 My first involvement with the UK Holocaust Memorial and Learning Centre (UKHMLC) was at the competition stage in January 2017 when I was asked by Adjaye Associates to review their competition design proposals. On winning the design competition, I was appointed by Adjaye Associates to provide Architecture, Heritage & Townscape advice as part of the package of services that they have provided for the Ministry of Housing, Communities and Local Government (MHCLG). My advice was provided independently of the Heritage, Townscape and Visual Impact Assessment Consultancy, which has been provided for the relevant EIA chapter by Montagu Evans, provided on a direct contract with the MHCLG.
- 1.3 My Statement formed part of the architects' Design and Access Statement (DAS) submitted in support of the planning application in December 2018. I have written this Addendum Statement, dated April 2019, in response to design changes made subsequently by Adjaye Associates. I note that the current proposal retains the fundamental approach of their December 2018 Masterplan with the following amendments:
- Revised design for the Entrance Pavilion;
  - Associated adjustments to the design of the memorial courtyard;
  - Rationalization of the Learning Centre footprint;
  - Extension of the Learning Centre Mezzanine level; and
  - Repositioning of the skylight within the landscape.
- 1.4 In my December 2018 Independent Statement I organised my assessment in relation to kinetic sequences – referring to accurate verified views created by Hayes Davidson – moving towards the entrance pavilion of the proposed NHM. I will not repeat those sequences here, as they remain largely unchanged. The principal changes of the Addendum 2019 relate to the Entrance Pavilion and associated Memorial Courtyard, and I will only consider here those views in which there are obvious design changes to that structure, space and sense of enclosure.
- 1.5 As I conclude, I remain confident that the Amended design proposals will result in an appropriate – indeed, world class – architectural and landscape intervention within the

Grade II Registered Victoria Tower Gardens. Also, I firmly believe it will enhance and not harm the character and setting of the Palace of Westminster within the WHS or the Gardens and will similarly enhance and leave unharmed other relevant heritage assets.

## 2.0 The Entrance Pavilion and associated memorial courtyard

- 2.1 **Sequence 1** (Figs. 5-8 of the December 2018 Independent Statement) starts at the southern end of Victoria Tower Gardens at the top of the two flights of steps leading to and from Lambeth Bridge and roundabout. The approach is down two flights of steps adjacent to the Embankment, with the proposed café on the left and the Playground beyond.
- 2.2 View 9 (Fig. 1) – looks down Embankment steps past proposed café, Playground and UKHMLC Entrance Pavilion beyond. The main change to the view is that the reconfigured and lowered Entrance Pavilion roof will enable more of the bronze Memorial Fins to be more visible beyond. The proposed Museum entrance will therefore have greater visibility in the view than the Entrance Pavilion, which will become less of a focus in the view. Similarly, in the additional verified view from the playground itself (not provided in my original Statement), View 23 (Fig. 2), the proposed Memorial Fins will have greater visibility as will the lower parts of the Palace of Westminster, its backdrop: the silhouette of the Memorial Fins will create a visually powerful relationship with the distant pinnacles of the Palace.



**Fig. 1:** View 9 – looking down Embankment steps past proposed café, playground and UKHMLC Entrance Pavilion beyond. Trees dominate the view particularly when in leaf.



**Fig. 2:** View 23 – looking through Playground towards UKHMLC Entrance Pavilion beyond.

- 2.3 **Sequence 3** (Figs. 11-14, December 2018) – begins at the northern end of Victoria Tower Gardens adjacent to Rodin's 'Burghers of Calais', and moves along the Riverside Walk looking towards Buxton Memorial, Fins and mound. View 18 (Fig. 3) is taken from close to Buxton Memorial, and will be very similar to the December 2018 view, except that the Buxton Memorial will read as more distinctly separate from the distant Entrance Pavilion, with a sky gap between them. Also, the planting will be extended along the base of the railings enclosing the Memorial Courtyard and so more clearly separating that space and those within it from the Riverside Walk.



**Fig. 3:** View 18 - from the Riverside Walk close to Buxton Memorial and Memorial Fins

2.4 **Sequence 4** (Figs. 15-19, December 2018) – begins south within the Gardens and looks across Millbank. View 19 (Fig. 4) is the view on entering the middle side gate of Victoria Tower Gardens looking towards the Memorial Courtyard and Entrance Pavilion. The vegetation here will become denser adjacent to the railings enclosing the Memorial Courtyard, the reconfigured of the Entrance Pavilion will be lower in the view and less visible: natural vegetation will predominate.



**Fig. 4:** View 19 – view on entering the Gardens gate to Memorial Courtyard and Entrance Pavilion

2.5 **Sequence 5** (Figs. 20-27, December 2018) – this is the UKHMLC entry sequence. The reconfigured Entrance Pavilion will have a reduced impact with an increased view of the Riverwalk and the River Thames (right) and the Memorial Fins (left) and the Palace of Westminster beyond: there will be a greater sense of space and openness. Within the Memorial Courtyard from View 22 (Fig. 5) – the view north across the Memorial Courtyard to the Memorial Fins will be very similar, but the courtyard space itself will be softened by additional planting and seating, as an integral part of the enclosure. The Buxton Memorial located outside the enclosure will be a more prominent visual component of the view. The removal of the glass screens around the Buxton Memorial and on the opposite side of the courtyard will provide clearer views from Dean Stanley Street. (View 13, Fig. 6)



Fig. 5: View 22 – view north across the Memorial Courtyard to the Memorial Fins



Fig. 6: View 13 from Dean Stanley Street

### 3.0 Summary Conclusions

- 3.1 The Scope of this Statement for the Addendum Application (2019) is to consider the quality and appropriateness of the proposed changes to the December 2018 planning application for the UKHMLC – principally the Entrance Pavilion and Memorial Courtyard – and in relation to potential impacts on the adjacent World Heritage Site and other heritage assets. I confirm I have reviewed the relevant documentation being submitted by the design and planning teams as part of the planning application. I have considered in my Statement the Site and its potential to accommodate the proposals based on the information I have received from the design and planning team, and my extensive experience gained from advising on major developments in London.
- 3.2 The kinetic sequences compiled in section 2 of my original Statement (December 2018) remain substantially the same as before. They illustrate the character and quality of the proposals as they are likely to be experienced by pedestrians moving around and into the UKHMLC. The principal changes to the Entrance Pavilion – the reconfiguration of its form – and the sense of separation and enclosure to the Memorial Courtyard – mainly through additional vegetation around its perimeter – have been considered in the revised views referred to in section 2 of my current Statement (April 2019).
- 3.3 In summary, my conclusions remain the same as for my December 2018 Statement:
- The proposals will have a negligible or minor impact on key views outside Victoria Tower Gardens, with some minor visibility – particularly in relation to the proposed visitor entrance along Millbank adjacent to the western boundary of the Site.
  - Within the Gardens the proposals will enhance views south from its wider northern end: the lawn will tilt up and away from the viewer and will provide the narrowing Gardens with a powerful new landscape, enhancing the setting of the adjacent Buxton Memorial bordered by the existing mature trees: the visible tops of the bronze Memorial Fins will provide a subtle visual conclusion to the lawn and their coloration and articulation will relate positively to the trees and Buxton Memorial.
  - The proposed playground and café beyond the raised lawn will be hidden from view when standing at the northern end of the Gardens and from within the Parliamentary Education Centre. As will the increased number and activity of visitors as they converge on the proposed Entrance Pavilion and make their

- way through the gently sloping Memorial Courtyard towards and between the bronze Memorial Fins down into the Learning Centre concealed below ground.
- Approaching Millbank from Lambeth Bridge the mature trees will continue to dominate and largely shroud Victoria Tower Gardens and the rich visual backdrop of the Palace of Westminster of the WHS will continue to provide the principal focus of views – along the river frontage and along its skyline silhouette. There will be glimpses between the mature trees bordering the Gardens of the proposed structures within – especially the café, Entrance Pavilion and Memorial Fins – each with their own distinct shape and character, and with the bronze Fins also drawing the gaze due their coloration. They will serve to provide the interior of the Gardens with visual depth and interest for passers-by and passers-through, as well as providing a visual structure and hierarchy, aiding way-finding for visitors to the UKHMLC.
  - The southern end of Victoria Tower Gardens will be provided with a new and powerful character and sense of place, which will be very specific to that end of the Gardens. The majority of the Gardens will have a very different character, distinctly separate from the southern end. Here, where the Gardens are their widest a carpet of grass will be maintained and subtly sloped above the proposed Learning Centre and landscaped with meandering paths. The proposed raised grass mound will provide visitors with a new viewing area where they can pause and appreciate the south elevation of the Palace of Westminster beyond the Parliamentary Education Centre at its base. The Grade II Registered Victoria Tower Gardens and the setting of the WHS will be enhanced and not harmed.
  - The settings of the existing memorials in the Gardens will also be respected and enhanced. At the northern end, the settings of the Emmeline Pankhurst Memorial by the northwest entrance to the Gardens, and Rodin's 'Burghers of Calais' located centrally adjacent to the Parliamentary Education Centre will remain unchanged. At the southern end, the Spicer Memorial will be acknowledged by an embracing curve of the northern boundary of the proposed Playground and will have more prominence as seen by visitors entering and exiting the proposed Entrance Pavilion of the UKHMLC. The Buxton Memorial will remain visible outside the Gardens when moving east from Smith Square down Dean Stanley Street towards Millbank and the Gardens – the Memorial Fins to its right will accentuate its visibility without detracting from its setting. In views from the north of the Gardens looking south the Buxton Memorial will be

seen as integral to the proposed landscape layout, and it will mark the threshold between the larger open landscape of the majority of the Gardens closest to the WHS, and the UKHMLC entrance and Playground in the more contained area to the south.

- 3.3 I firmly believe that the proposals will enhance the Grade II Registered Victoria Tower Gardens, and that the significance and OUV of the WHS and of relevant heritage assets will be left unharmed. The design changes provided for the Addendum Application serve to reinforce this assessment. I therefore fully support the planning proposals for United Kingdom Holocaust Memorial and Learning Centre.

Professor Robert Tavernor