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2 October 2020

Dear Mr Morgan,

Installation of the United Kingdom Holocaust Memorial and Learning Centre at The Victoria Tower Gardens, Millbank, London, SW1P 3YB (“the Development”)

It is understood that the Public Inquiry into the Development opens on 6th October 2020. You will have been provided with TfL’s submitted Initial and Stage 1 Consultation comments to City of Westminster Council ‘the Council’ and the GLA respectively, both dated February 2019. TfL also provided input into the GLA’s Representation to the Inquiry which was submitted to PINs on 30 January 2020.

TfL has been involved in the consultation process since pre-application stage and is concerned that our comments and concerns have not been sufficiently addressed. Specifically, that no mitigation towards the Development’s impact on Lambeth Bridge North has been secured. A contribution of £1million is required towards the delivery of The Lambeth Bridge North scheme (LBN) and will be used specifically to;

- Provide wide new signalised crossing points on the desire lines at the Lambeth Bridge North junction for pedestrians accessing and exiting Development. This will be across all arms of the junction including Lambeth Bridge (if visitors are heading to/from Tate Britain or coach parking on Millbank South and Millbank North or if visitors head from/towards Victoria transport hub).
- Widen the narrow footways at the junction which will improve accessibility and safety for pedestrians, supporting the increased pedestrian footfall generated by the Development.
- Signalising the LBN junction will lower traffic speeds at the junction which will make it inherently safer for all road users, particularly pedestrians.

The LBN scheme is a flagship Healthy Street streets scheme designed to deal with cumulative impacts in the area, supporting delivery of the Mayor’s Healthy Streets

Objective which is to encourage active travel and make London's streets more inclusive for everyone to walk, cycle and spend time on. The scheme is deemed a safety critical project by TfL and aims to reduce road danger and improve pedestrian safety in this location. The proposed layout of the LBN scheme is included in Appendix A.

The Council have advised that there is no reasonable policy requirement for securing this contribution request. This letter sets out the reasons why TfL disagree with the Council's conclusion and sets out the request for financial mitigation for the LBN scheme, and the request for it to be included in any grant of planning permission for the Development. The reasons are as follows:

Trip Generation and Pedestrian Comfort

The Development is a significant trip generator; the number of ticketed visitors proposed to access the Memorial and Learning Centre is 3000 + trips per day, with an additional 7000 estimated trips per day entering the park to view the memorial only. These figures are set out in section 4, page 16 of the Visitor Management Strategy (dated December 2018) (CD 5.8). The location of the Development will pull visitors further south from Parliament Square into a quieter area, with narrower footways, creating greater demand on the local streetscape and thereby generating a need for mitigation for LBN.

Section 9.2.17, P65 of the applicant's Transport Assessment sets out a pedestrian movement assessment based on the Fruin Levels of Service Methodology. This categorises the pedestrian movement through a constrained location; Gate 1, the entrance closest to Parliament Square, and the narrow footway on Millbank north where the applicant assumes the majority of visitor footfall will be attracted to. The assessment concludes that Gate 1 operates at a Fruin LoS C with a small occurrence of LoS D at the northern end of the gate for short periods of time. LoS Level C is referred to as pedestrian movement which is;

'restricted ability to select normal walking speed and freely pass others. High probability of conflict where crossing movements & counter-flows exist. Conflict avoidance requires frequent adjustment of walking speed and direction. Flow is reasonably fluid, however considerable friction & interaction between pedestrians is likely to occur.'

LoS Level D is categorised as;

'Restricted walking speed, overtaking slower pedestrians is difficult, Counter-flows & crossing movements severely restricted. Some probability of reaching critical density causing temporary stoppages.'

Based on the above category explanation, the visitor experience of entering and exiting the Development from Gate 1 will be unattractive to visitors. Instead, TfL suggest that in reality, visitors will seek to avoid a potentially uncomfortable access experience from Gate 1 and walk slightly further down Millbank to enter the Development, or indeed view the Development from outside the Gardens on Millbank or Lambeth Bridge, where there are four other Gates providing access to the Development.

Improved Public Realm

The LBN scheme will improve safety by introducing dedicated facilities for vulnerable road users in line with the Mayor's Vision Zero Agenda. The proposals create space and time for cyclists to pass through the junction by introducing new signalised crossings and clearer walking routes for pedestrians in line with London Plan Policy 6.10 Walking and Policy T2 Healthy Streets of the Intend to Publish London Plan.

Visitors to the Development will directly benefit from these improved pedestrian facilities, pedestrian priority and wider footways, making this demand specific to mitigate the impact of the Development's trip generation and large number of new visitors dwelling in the area. Section 8.3.11, P47 of the application's Transport Assessment, states that an indicative demand of 32% of footfall to the Development will be from the south and the remainder will be from the north, from Parliament Square. Therefore, in line with London Plan Policy 6.3 and Intend to Publish London Plan Policy T4 Assessing and Mitigating Transport Impacts, the Development should; specifically;

A be integrated with current and planned transport access, capacity and connectivity

C Where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified

E The cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, should be taken into account and mitigated.

F Development proposals should not increase road danger.

The street environment must be able to accommodate the Development in line with London Plan Policy 6.3 and Intend to Publish London Plan Policy T4 and not increase road danger. Hostile Vehicle Mitigation measures should be installed by the applicant, through a s278 agreement with TfL. Given the Development use and high-profile location, and high level of new pedestrian trips (10,000 people per day), pedestrian safety is of critical importance and security measures should be provided in line with the Mayor's Vision Zero agenda.

TfL has consistently set out the need for a contribution during all discussions about the application. Policy T2 Healthy Streets, Section D states, development proposals should;

1) demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance

2) reduce the dominance of vehicles on London's streets whether stationary or moving

3) be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport.

The applicant's assessment of the site against the Healthy Streets Indicators confirmed a reduction in the following Indicators, which highlights that the Development does not conform with this policy;

- people choose to walk, cycle and use public transport (reduction of 4)
- People feel safe (reduction of 5)
- People feel relaxed (reduction of 5)

A copy of the Applicant's Healthy Streets Scheme is included in Appendix B. The LBN scheme will provide improved Healthy Streets public realm, specifically for pedestrians in the form of wider footways. Visitors to the Development will congregate on Lambeth Bridge and LBN junction when viewing and travelling to the Development, as well as accessing the site from Gate 4 and 5 which are accessed directly from the junction. According to Table 11 on P64 of the Transport Assessment, there will be a Peak PM hour weekday flow of 544 visitors on the section of Millbank connecting to the junction. This level of pedestrian trips will be exacerbated over the full day, not only during Development opening hours, but also taking account of visitors who will pass-by the Development to view it from Lambeth Bridge and adjacent streets when the Development is closed. This will intensify the requirement for footway widening, which will be provided as part of the LBN scheme.

Where the Development reduces the Healthy Street Indicators; the LBN scheme will increase the Healthy Street score, improving the streetscape for pedestrians. The mitigation TfL proposes will off-set the impact of the Development by creating a safer and more functionally appropriate highway layout which will accommodate the existing and new visitor trips to this area. It should be noted that the 2017 permission for Ergon House, Horseferry Road includes developer contributions for the public realm works.

As it stands, TfL are of the view that the Development does not sufficiently mitigate its impact on the surrounding area. It is unacceptable for high trip attracting site, of national and international significance, in a high-profile location, to fail to mitigate the pedestrian impact and not conform with London Plan Policy 6.10 Walking and Intend to Publish London Plan Policy T2.

Coach Impact

The Development is forecast to generate 11 daily coach trips (with approx. 56 passengers per coach), as stated within Appendix C – Coach Parking management Strategy, which must be catered for. Regardless of the final location of the coach drop-off bay, whether this is outside the site on Millbank or Millbank South, opposite Tate Britain; the number of pedestrians dwelling on the adjacent footways and traversing Millbank will increase. This will impact the LBN Roundabout directly and pose a road safety, Vision Zero risk. The LBN scheme will reduce road safety risk, reducing car dominance and slowing vehicles which will provide a safer environment for pedestrians. Mitigation in the form of a financial contribution is therefore necessary in line with London Plan Policies, 6.1, 6.3, 6.10 and Intend to Publish London Plan policies, T1, T2 and T4.

Summary

For the reasons set out above, the contribution request is directly aligned with the Mayor's Vision Zero Agenda, London Plan in line with London Plan Policies, 6.1, 6.3, 6.10 and Intend to Publish London Plan policies, T1, T2 and T4 and therefore TfL are of the view that it meets the legal s106 tests for the following reasons,

- **Necessary to make the development acceptable in planning terms**
The proposed development will generate an increase in pedestrian movements, which alongside other growth in trips cannot be catered for safely by the current infrastructure. The contribution will help to meet the needs of all users, including but not limited to increasing footway and crossing capacity for visiting pedestrians.

- **Directly related to the development**

This contribution is directly related to the Development as a proportion of Development trips access the site via the LBN roundabout, contributing to cumulative impact at this location. The level of contribution has been calculated to be fairly related in size and scale in relation to the level of impact.

- **Fairly and reasonably related in scale and kind to the development.**

This contribution is related in scale and kind to the Development as the Development creates specific demand on LBN junction and Lambeth Bridge. There are 3,000 ticketed trips, including coach parties, as well as 7000 + non-ticketed trips per day which could be an unknown quantity of those wishing to view the memorial. Even taking into account the number of trips which would be 'pass-by' this development proposal will bring people further south where the footway infrastructure is not adequate for this level of use, exacerbating the need for the delivery of the LBN scheme.

Therefore, before planning permission can be granted for the Development, the requested £1m contribution should be secured in any s106 agreement entered into. Other TfL mitigation requests, which have been made in our submissions to the Council and the GLA Stage 1 report, are as follows:

- Request the following planning Conditions are included, all of which should be signed off by WCC in consultation with TfL;
 - Coach Parking Management Plan
 - Travel Plan
 - Delivery and Servicing Plan and
 - Construction Logistics Plan
- A £20k contribution for Legible London signage is also required.
- *It is also a vital requirement, in the interest of pedestrian security, that the applicant provides appropriate and proportionate protective security measures around the site. This is to mitigate the risk to the significant number of visitors*

expected at this site in the future. A full Threat and Vulnerability Risk Assessment (TVRA) will be required to inform the level of protection necessary. These measures should be provided through a s.278 agreement and secured in the s106 legal agreement. This includes the area around Lambeth Bridge NW junction and the northern steps from the bridge and should tie in with proposed security measures on Lambeth bridge.

TfL request that these matters are considered in the Inquiry, and respectfully requests that the financial contribution towards the delivery of the LBN scheme is appropriately secured before any planning permission is granted.

Should you require any further information, please contact our case officer ChloeFlower@tfl.gov.uk or myself at danny.calver@tfl.gov.uk.

Yours sincerely

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

Danny Calver
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Inc.

Appendix A: Lambeth Bridge North Scheme Layout
Appendix B: Applicant's Healthy Streets Assessment