**SECTION 77 OF THE TOWN AND COUNTRY PLANNING ACT
1990 (AS AMENDED)**

**CALL IN INQUIRY INTO THE PROPOSED DEVELOPMENT OF THE UNITED KINGDOM HOLOCAUST MEMORIAL AND LEARNING CENTRE LOCATED WITHIN VICTORIA TOWER GARDENS, MILLBANK, LONDON SW1P 3YB**

**PROOF OF EVIDENCE OF ALEX ANDREWS, BA (HONS), MRTPI**

**On behalf of**

**THE SECRETARY OF STATE FOR HOUSING COMMUNITIES AND LOCAL GOVERNMENT**

**TOWN AND COUNTRY PLANNING (INQUIRIES
PROCEDURE) (ENGLAND) RULES 2000**

8/9/20

**CONTENTS**

[**1.0** **QUALIFICATIONS AND EXPERIENCE** 3](#_Toc50957782)

[**2.0** **INTRODUCTION AND SCOPE OF EVIDENCE** 4](#_Toc50957783)

[**3.0** **ENGAGEMENT TO DATE AND COMMON GROUND** 5](#_Toc50957784)

[**4.0** **DISPUTED MATTERS AND RESOLUTION** 10](#_Toc50957785)

[**5.0** **CONCLUSIONS** 12](#_Toc50957786)

## **1.0** **QUALIFICATIONS AND EXPERIENCE**

**Alex Andrews will say:-**

* 1. I hold a Bachelor of Arts with honours degree in Urban Planning (BA hons Urban Planning), and I am an accredited Member of the Royal Town Planning Institute (RTPI).
	2. I have over 20 years’ experience in the town planning and transport planning sector across both public and private sectors. I spent 12 years working for Transport for London (TfL) within the Land Use Planning and Strategic Spatial Planning Teams. During my time at TfL I was responsible for managing planning applications and infrastructure projects on behalf of TfL in a large part of West, South and Central London including Westminster.
	3. During my time at TfL I was responsible for reviewing Transport Assessments, including trip generation, mode share, access, servicing and parking. This has included a number of high-profile developments across London including Earls Court and Brent Cross Cricklewood, as well as Nova in Victoria within the City of Westminster.
	4. I have also been involved in providing evidence at Local Plan reviews and Mayoral Stage 3 call in applications. Since joining WSP I have been responsible for developing planning applications, transport assessments and other documentation for a wide range of planning and transport related projects, and I have given evidence at Local Plan reviews.
	5. I am very familiar with the Application Site and the surrounding area having worked on several schemes in the vicinity. I also have extensive experience of applying the policies governing transport to planning applications, as well as liaison between applicants and stakeholders.
	6. I have read all the relevant background information and have been assisted by the same colleagues who worked on the Application and made such enquiries as I consider to be necessary to fulfil my duties as an expert witness.
	7. I confirm that my evidence to this Inquiry has been prepared and is given in accordance with the guidance of my Professional Institutions and I confirm that the opinions expressed are my true and professional opinions
1. **INTRODUCTION AND SCOPE OF EVIDENCE**
	1. I am instructed by the Secretary of State for Housing, Communities and Local Government (the "**Applicant**") in respect of proposals for the installation of the United Kingdom Holocaust Memorial and Learning Centre (the “**UKHMLC**”) within Victoria Tower Gardens, Millbank, London (the “**Site**”).
	2. I will be providing evidence on matters pertaining to transport of relevance to the UKHMLC. This is divided into two parts as follows:
* Part 1 sets out the work undertaken to date with regards to transport, including a summary of the documents submitted and all matters having been agreed with Westminster Council (WCC) during the application process;
* Part 2 responds to the issues raised by the Rule 6 Parties with reference to the technical evidence already prepared and submitted to WCC.
1. **ENGAGEMENT TO DATE AND COMMON GROUND**
	1. In this section I present a summary of the engagement undertaken to date with Westminster City Council, setting out the methodology and findings

**Work to date**

* 1. The transport proposals have been set out in the Transport Assessment submitted in December 2018 and TA Addendum submitted in to WCC as part of the planning application.
	2. Matters relating to the projected number of visitors and their anticipated travel patterns are dealt with in the **pedestrian modelling** evidence presented to the Inquiry.
	3. The key transport arrangements proposed as part of the UKHMLC are:
1. No car parking to be provided on-site, in order to encourage travel by sustainable modes;
2. Cycle parking to be provided along the footway of Millbank opposite the park entrance;
3. Coaches to drop off and pick up visitors along the eastern kerbside of Millbank outside the park entrance;
4. Refuse collection to take place on-site outside of UKHMLC opening hours, with occasional other deliveries (café deliveries etc.) to stop along the eastern kerbside of Millbank.
	1. Subsequent discussions took place post-submission with WCC and TfL as summarised in the TA Addendum (CD 6.39) submitted in August 2019. This set out further details regarding the proposals for cycle and coach parking as well as the Healthy Streets assessment.
	2. Chapter 2 of the TA sets out how the development complies with national, regional and local planning policies relating to transport.
	3. The proposals comply with NPPF policies including those on sustainable transport by ensuring that safe, suitable access is provided for all users of the site, prioritising non-car users by way of its excellent accessibility by foot, cycle and public transport and by not providing car parking for visitors; the needs of mobility impaired visitors are also catered for through the presence of existing on-street blue badge parking bays nearby, and the site accesses are fully step-free.
	4. The proposals comply with PPG policies regarding the scope and content of the TA.
	5. The proposals comply with the London Plan policies including those regarding the closer integration of transport and development, including the impact of new development trips on the transport network, as well as cycle parking for staff and visitors. Arrangements for coaches have been extensively considered.
	6. The proposals comply with WCC policies including those regarding public transport, facilities for pedestrians and cyclists, and servicing arrangements.
	7. The issues raised by WCC following submission of the application, and covered by the TA Addendum, were:
5. The kerbside markings to provide for coach drop-off / pick-up along Millbank;
6. The kerbside markings to provide for on-street servicing;
7. The location of cycle parking;
8. The net reduction in the Healthy Streets assessment score.
	1. The TA Addendum also addressed comments raised by TfL regarding the location of the coach drop-off / pick-up bay, the proposed changes to Lambeth Bridge and the Healthy Streets assessment.

**Common Ground**

Coach parking

* 1. The original proposal was for a 30m long coach bay to be introduced on the eastern side of Millbank adjacent to the park, to allow coaches to drop off and pick up adjacent to the UKHMLC, thereby minimising the walking distance for school children, elderly or disabled visitors. The proposed coach bay was designed to deter any other vehicles from stopping in the bus lane, and no coaches would be permitted to stop during the morning or afternoon rush hours (07:00 to 10:00 and 16:00 to 19:00 respectively) in order to minimise delays to TfL bus services.
	2. WCC expressed a preference for this to be amended to double yellow lines, along which coaches are permitted to stop for the time required to drop off and pick up passengers.
	3. The applicant is fully supportive of restrictions which only permit vehicles to be stationary for the minimum time required, in order to maximise capacity and avoid vehicles idling alongside the footway which will be used by UKHMLC visitors and the general public. The coach bay had been proposed in order to avoid other vehicle types stopping along this section of the kerbside; however, double yellow lines with appropriate enforcement would also provide the necessary facilities for coaches to serve the site. The applicant was therefore happy to amend the proposals to provide double yellow lines along Millbank in place of the coach bay originally proposed.
	4. In WCC’s planning report (p.74) a concern is raised regarding the impact which coaches stopping in the bus lane would have on TfL buses. WCC note that no coaches would be present during the busiest times of day for buses. WCC also note that TfL did not raise this as a concern.
	5. In WCC’s planning report (p.74-75) a concern is raised regarding the impact which coaches stopping in the bus lane would have on cyclists. However WCC note that no coaches would be present during the busiest times of day for cyclists. WCC also note that TfL did not raise this as a concern.

Coach bay location

* 1. In their initial response to the application, TfL requested that an alternative location for coach drop-off and pick-up be identified, since there are proposals currently under consideration for the area north of Horseferry Road to be subject to access restrictions for security reasons.
	2. An alternative proposal was therefore presented which would enable a short section of the layby on Millbank south of the Lambeth Bridge roundabout to be converted for use as a coach bay. The design of this was satisfactory to TfL.
	3. The applicant would be supportive of measures to increase security in the area north of Horseferry Road, recognising the importance of safety for visitors as well as the significance of the UKHMLC itself. All coaches would be pre-booked and therefore it would be straightforward to present authorisation to enter the restricted area at a checkpoint. The small amount of daytime servicing could be accommodated as part of a wider scheme which would be in any case required to accommodate the servicing requirements of the wider area.
	4. The potential restrictions to vehicular access to the area north of Horseferry Road are still in development, and the UKHMLC transport proposals remain for coaches to stop on Millbank adjacent to the park. In the event of restrictions subsequently coming into force which prevent even pre-booked coaches from accessing this location, the alternative arrangement south of Lambeth Bridge could easily be implemented at short notice without any physical changes to the highway or footway.
	5. It is noted that WCC planning only requests clarification on whether the alternative location is in fact the one now being proposed in the application, and do not object to the original location proposed. It has been clarified that the planning application seeks approval for the original coach loading proposal, namely adjacent to the site; WCC did not object to this location.

On-street servicing

* 1. The original proposal was for a 7m long servicing bay to be located along the eastern kerbside of Millbank. While most servicing would take place on-site outside of opening hours, occasional deliveries (for example fresh ingredients for the small on-site café) would take place during daytime; in order to avoid conflict between pedestrians and vehicles, no delivery vehicles would enter the site during opening hours. Any daytime deliveries during the daytime would be mail or small packages, likely to be delivered by hand or at most using a small trolley.
	2. WCC raised a concern as to why the proposals required a dedicated servicing bay, and questioned whether this was indicative of a higher than predicted servicing trip generation.
	3. The servicing bay had been proposed in order to avoid other vehicle types stopping along this section of the kerbside; however, double yellow lines with appropriate enforcement would also provide the necessary facilities for the small number of daytime servicing vehicles to deliver to the site. The applicant was therefore happy to amend the proposals to make use of double yellow lines, and no dedicated loading bay will be provided.

Cycle parking

* 1. WCC had expressed concerns that the cycle parking proposed to be located along the western footway of Millbank would constitute an obstruction to pedestrians, and requested that the applicant instead consider ways to accommodate visitor cycle parking within the park.
	2. Cycle parking was proposed to be located along the western footway of Millbank in order to be as close as possible to UKHMLC without requiring bicycles to be brought into the park or along the eastern footway of Millbank, both of which could lead to greater pedestrian congestion.
	3. The applicant explained that there are several stretches of existing Sheffield stands along the western footway of Millbank which could be extended to accommodate the requisite number of additional spaces. WCC noted that the existing layout is determined in part by the presence of trees which could prevent the extension of the cycle parking. However the applicant notes that Sheffield stands require a depth of only 250mm for installation, or indeed can be installed using a base plate with no excavation required. Furthermore, alternative parking in the form of planters would require no excavation and would also provide additional benefits in the form of vegetation.
	4. WCC are satisfied that the issue of cycle parking could be dealt with by condition, and TfL are also satisfied with the cycle parking arrangements. TfL note that the potential future congestion at the pinch point immediately outside Gate 1 could be resolved by a small change to the layout of the security barrier.

Healthy Streets assessment

* 1. WCC noted that the proposed scheme resulted in a net reduction of 5 in the Healthy Streets assessment, including the presence of a new zero score, and were therefore concerned about the net impact of the design upon existing and future users of the public realm.
	2. Further work was undertaken in this area and the results presented in the TA Addendum.
	3. No physical changes are proposed to the footways or carriageways of Millbank; the reductions only arise due to the following reasons:
1. An increase in heavy vehicles using the southbound bus lane to drop off and pick up passengers along the double yellow lines between 10:00 and 16:00;
2. An increase in footfall along the eastern footway of Millbank, particularly between 10:00 and 16:00.
	1. It was clarified that none of the indicators scored zero, however one of the 31 metrics feeding into the assessment experiences a slight decrease from one to zero, as a result of an increase in heavy vehicles using a bus lane which is also shared by cyclists. This is as a result of coaches stopping to drop off and pick up passengers.
	2. WCC’s planning report notes that the coach activity will take place outside of peak times for cyclist movements, and that TfL do not raise this as a concern.
	3. WCC’s planning report notes that the additional pedestrian footfall would not constitute a road safety or operational issue if managed, which it would be since all coach groups would be under the supervision of a tour organiser. Furthermore, the report also notes that alternative pedestrian routes are available for people wishing to avoid the short section of footway along which groups may temporarily be standing.
	4. The clarifications presented in the TA Addendum and discussed at a follow-up meeting with WCC satisfactorily addressed the issues raised in the initial response to the application.
	5. TfL also requested that a Healthy Streets assessment be undertaken for the alternative coach drop-off bay design along Millbank south of the Lambeth Bridge roundabout. This was presented in the TA Addendum. The assessment shows a reduction of 4 in the overall score, with no metrics scoring zero. TfL did not raise the outcomes of either of the two Healthy Streets assessments as a concern.

Summary

* 1. In summary, the matters raised in the post-application responses by WCC and TfL, and contained in WCC’s planning report, have all been dealt with to the satisfaction of both parties, and there are no reasons why the proposed development should not be granted planning permission on transport grounds.
1. **DISPUTED MATTERS AND RESOLUTION**

19

**Disputed Matters**

Matters Raised

* 1. In these circumstances, having regard to the matters set out in the Rule 6 statements, and as identified by the Inspector in his pre-Inquiry note, I consider the main issues in dispute are:-
1. That the transport impacts of the proposed development should be covered in a transport assessment (London Parks & Gardens Trust paragraph 12);
2. That coaches stopping along Millbank would obstruct buses, cause a hazard to cyclists, and cause pedestrian congestion (The Thorney Island Society paragraph 24);
3. That TfL have not expressed concern regarding the issues of buses, cyclists and pedestrians (The Thorney Island Society paragraph 25);
4. That no firm plan exists for coach parking and that coaches cause disruption and potentially damage to the area around St John Smith’s Square (The Thorney Island Society paragraph 26); and
5. That the UKHMLC would increase the volume of private cars leading to congestion and parking issues (The Thorney Island Society paragraph 27).
	1. It is noted that the Statement of Case put forward by WCC to the Planning Inquiry does not make reference to matters relating to transport.
	2. However on p.73 of WCC’s planning report appended to the SoC, reference is made to the UKHMLC being ‘expected to attract approximately 3.65 million total visitors per year.’ This is covered in the evidence put forward regarding pedestrian modelling.

Response

* 1. The concerns listed above are dealt with in turn below.
	2. **Transport assessment**: the applicant submitted a Transport Assessment and TA Addendum to WCC, both of which were reviewed and the findings presented in the planning report.
	3. **Impact on buses**: there would not be any additional vehicles permitted to stop in the bus lane between the hours of 07:00-10:00 and 16:00-19:00, that is to say at the time of greatest bus patronage. During the six daytime hours of opening, coaches would only be permitted to stop for the time required to load and unload passengers. TfL, who operate the bus services, do not raise this as a concern.
	4. **Impact on cyclists**: no vehicles would stop in the bus lane between the hours of 07:00-10:00 and 16:00-19:00, that is to say at the time of greatest cycling flow. During the six daytime hours of opening, coaches would only be permitted to stop for the time required to load and unload passengers. TfL do not raise this as a concern and it is noted that the bus lane already houses a bus cage which buses from two scheduled services stop in at regular intervals.
	5. **Impact on pedestrians**: the majority of pedestrians will enter and exit the park via the northern gate, and it has been demonstrated that a minor relocation of the existing security barrier controlling the Parliament vehicular egress would provide a large effective width for pedestrians to walk along. The proposal for coaches to stop along Millbank has been designed specifically to enable passengers to walk directly into the park and minimise congestion on the footway.
	6. **TfL response**: regular dialogue has been maintained with TfL throughout the planning process and all matters raised by TfL have been dealt with to their satisfaction. WCC have not challenged TfL’s comments or recommendations with regards to the proposals, which have been developed in accordance with both parties’ preferences.
	7. **Lack of coach parking strategy**: TfL Coaches have been included throughout the consultation process. An alternative coach drop-off / pick-up location is proposed in the event of access restrictions coming into force north of Horseferry Road. A maximum of 22 coach arrivals per day (11 to drop off and 11 to pick up) are projected, and these would be spread across the hours of 10:00 – 16:00. A Coach Parking Management Plan will be submitted post-determination.
	8. **Congestion from car movements**: a maximum of 31 car and 6 taxi trips in each direction are anticipated on any given day. No on-site car parking will be provided. The impact of car and taxi movements on the highway network will be negligible. The WCC planning report also notes that the impact of the UKHMLC on controlled parking zone occupancy will be negligible.
1. **CONCLUSIONS**
	1. The evidence set out above, and presented in the Transport Assessment and TA Addendum, demonstrates that all matters pertaining to transport have been dealt with to the satisfaction of WCC. All objections raised by Rule 6 parties have been addressed, and there are no reasons outstanding to deny planning permission for the proposed UKHMLC on these grounds.