



HOLOCAUST MEMORIAL

WSP TRANSPORT REBUTTAL STATEMENT

ALEX ANDREWS, WSP

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Introduction

1.1 This rebuttal statement has been prepared by Alex Andrews in response to the Rule 6 Proof of Evidence prepared by Christopher Thomas Peck on behalf of the Save Victoria Tower Gardens (SVTG). The statement considers the effect of the development on transport (excluding pedestrian movements)

Main response

2.1 The objector's statement and response revolves around a number of issues which in their opinion are considered unacceptable and to which we are rebutting and these are summarised below.

- Para 5 – Refers to Abingdon Street and Millbank carrying significant volumes of vehicular traffic and particularly high volumes of pedestrian traffic.
- Para 8 – Refers to the volume of cycle traffic Southbound (40%) on Abingdon Street, and that the construction and coach proposals will make cycling significantly less safe.
- Para 9 – Refers to the development being unsuitable in this location due to the effect on pedestrians and road users, and states that key problems have not been addressed and the proposed mitigation is insufficient. As a result the application should be refused because the residual cumulative impacts on the footway network would be severe and because there would be a potentially unacceptable impact on highway safety from construction and servicing traffic.

2.2 The objector's Rule 6 statement is then organised into 3 key sections, which we will respond to in turn.

Security concerns and pedestrian comfort

3.1 These issues are dealt with within the pedestrian movement rebuttal statement prepared by Brett Little of WSP, together with the security rebuttal statement prepared by Matthew Brittle of WSP.

Wider impact on the road network

4.1 The impact on the wider road network was discussed at length with TfL and WCC officers. WCC officers concluded in their decision *'In terms of activity on the highway arising from coaches and servicing, it is expected that this could be controlled by condition to secure details of Coaches and Servicing Operational Management Plans. The provision of sufficient cycle parking could also be dealt with by condition. It is noted that Transport for London consider the proposal is acceptable in transportation terms subject conditions relating to Coach Parking Management, a Travel Plan, Delivery and Servicing Plan, and Construction Logistics Plan.* Nothing that the objector has raised in their statement would require officers to change their view on the Application.

4.2 In paragraph 28, the objector has noted that there is likely to be an increase in taxi journeys due to the increased use of app-based private hire services. Given the amount of tourist attractions within the surrounding area, it is likely that many of these trips will already be on the network. It should be noted that general traffic flows within London, and in particular Central London, have been steadily declining over a number of years (see TfL Travel in London Reports, pages 1-12). Further measures, such as those proposed by TfL (e.g. Lambeth Bridge scheme), will further reduce traffic and promote safe routes for cycling.

4.3 In paragraph 29, the objector raises the issue of delays to buses and cycles due to coaches parking in the bus lane. This issue was discussed at length with TfL during the pre-application and postapplication stages and TfL was satisfied that the potential impacts were not sufficient to merit refusing the planning application. A total of 11 coaches per day is not a large number of coaches during the course of a day,

regardless of the 15 minute dwell times for drop off and pick up. In addition, the majority of coach movements will be outside of the peak hours where the number of cyclists using this stretch of Millbank will be significantly less. The arrangements for coach drop off will be managed through the production of a Coach Management Plan which will be secured by a planning condition. The Coach Management Plan will be used to ensure that all coach related operations are undertaken safely without causing unacceptable impacts upon buses or with detriment to vulnerable users. Whilst not specifically proposed at this stage it may be possible to use coach marshal's to manage coach operations and this will be considered at a later date.

4.4 Paragraph 30 refers to the Healthy Streets assessment which was undertaken within the TA and reviewed by TfL, who were satisfied that despite the score being reduced the proposals were deemed acceptable. It is noted that there is a reduction in the score due to the nature of the proposals, which is unavoidable based on the proposals put forward. However, it was agreed with both TfL and WCC officers that the Coach Management Plan would investigate options to address the issues identified in the Healthy Streets Assessment.

4.5 Paragraph 33 suggests that all issues would be obviated by moving coaches to south of Lambeth Bridge to the existing coach parking area. This option was discussed with TfL but has yet to be viewed as a realistic or viable option by the Applicant because of the distances between the coach parking and the Application Site, particularly for school parties. TfL also maintained that this area was already at or over capacity. These discussions may continue as part of agreeing the Coach Management Plan.

Risks to cyclists from servicing and construction

5.1 As we have already acknowledged, safety will be paramount in the construction and operation of the HMLC scheme. We note that the objector's statement refers to the potential dangers to cyclists from construction vehicles. This is fully respected by the Applicant and all measures will be taken to ensure that all dangers and risks are eradicated through recognised industry safety standards, including Construction Logistics and Community Safety (CLOCS) and Fleet Operator Recognition Systems (FORS). These will ensure that all vehicles are fitted with the correct safety equipment and all drivers are fully trained and have the necessary certification. The details will be confirmed within the Construction Management Plan (CMP) which has been secured by condition. There will be overlap between the CMP and the Coach Parking Management Plan to ensure that coach drivers are also fully appreciative of the safety requirements of operating coaches within this section of Millbank.

5.2 There is suggestion in paragraphs 36 and 37 of the objector's statement that the crossing of a cycle lane via a right turn into the site across oncoming cyclist for access purposes is unsafe. However, this is standard practice on almost every major road in London with a junction or access to a property. Similarly the left hand turn into the site from Millbank will be a standard movement which occurs on the majority of London's major roads, and itself is unavoidable in the majority of cases. TfL's issue has been with the left hand turn at major junctions such as (Lambeth Bridge) where cyclists making the straight across movement can often find themselves within a large vehicle's blind spot when the vehicle is turning left. This scenario is a general concern with driver operation and is not isolated to any one site. TfL are not suggesting that all such left turns are banned as this would be impossible. However, through the CMP it may be possible to review the directions from which vehicles approach the Site. In addition, CLOCS and FORS will be used to manage driver safety, and all vehicles will be fitted with the required safety equipment.

5.3 As part of the CMP the Applicant will propose the use of marshals to access the construction site and they will have a remit to ensure cycle safety is maintained. The numbers and types of vehicles and



vehicle routings will also be kept under review throughout the CMP to ensure any risk to life resulting from construction vehicles is eradicated.

Summary

6.1 We strongly believe that potential issues relating to transport can and will be adequately addressed through future management plans without requiring any significant changes to the submitted scheme. Based on the responses received from TfL and WCC officers we understand that they agree with this, and are happy that these issues were not deemed significant enough to form a reason for refusal and can be satisfactorily addressed through planning conditions and the section 106 agreement. In addition none of the points put forward in the statement refer to the proposals being contrary to the London Plan or Westminster City Plan policies.

6.3 In response to paragraph 43, we acknowledge the number of cyclists using this section of Millbank, particularly during peak hours. However the majority of coach movements will be outside of peak hours and therefore will be less of a concern. The proposed Coach Parking Management Plan and Construction Management Plan are proposed as the mechanisms to ensure that adequate management measures are put in place to ensure the safe and efficient operation of the transport network.

6.4 In response to paragraph 44, whereby the objector statement refers to a 'severe impact' which follows on from an earlier reference to NPPF (paragraph 109), we are firmly of the view that 'severe' impact relates to traffic on the network and should not be applied to transport in this case.

6.5 We conclude that the Proposed Development is acceptable in transport terms or can be made acceptable through the use of planning conditions and section 106 obligations.