



Your ref: 19/00114/FULL  
Our ref: 19/0176

David Dorward,  
City of Westminster,  
Planning Department  
Sent via email only  
8<sup>th</sup> February 2019

Transport for London  
City Planning

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Dear David,

Phone 020 7222 5600  
[www.tfl.gov.uk](http://www.tfl.gov.uk)

**TfL Initial Comments -  
The Victoria Tower Gardens, Millbank, London, SW1P 3YB**

I write following notification of the above planning application on the 14<sup>th</sup> January 2019, which is also referable to the Mayor of London. The proposal comprises the Installation of the United Kingdom Holocaust Memorial and Learning Centre including excavation to provide a basement and basement mezzanine for the learning centre (Class D1); erection of a single storey entrance pavilion; re-provision of the Horseferry Playground and refreshments kiosk (Class A1); repositioning of the Spicer Memorial; new hard and soft landscaping and lighting around the site; and all ancillary and associated works.

Please note that these comments represent the view of Transport for London officers and are made entirely on a “without prejudice” basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to a planning application based on the proposed scheme. These comments do not necessarily represent the views of the Greater London Authority (GLA).

**Site Location and Context**

The proposed development comprises of the National Holocaust Memorial café and learning centre to be located within Victoria Tower Gardens, Millbank.

The site is located in a highly accessible central location on A3212 Millbank North. The Public Transport Access Level (PTAL) of the site is 6a ‘excellent’ (on a scale of 0-6b where 6b is the highest).

The nearest London Underground station is Westminster, located approximately 500m to the north of the site (Circle, District and Jubilee Line). A bus stop is located directly adjacent to the Gardens with a bus lane running southbound the length of Millbank North.

Millbank North is part of the Strategic Road Network (SRN) for which TfL have oversight responsibilities for with Westminster City Council being the highway authority. Millbank Roundabout, Millbank South and Lambeth Bridge are part of the Transport for London Road Network (TLRN). Westminster City Council is the planning authority for the area.

Victoria Tower Gardens has five pedestrian access gates, four on Millbank and one on Lambeth Bridge. Millbank has a well-established network of footways and pedestrian

crossings. There are six bus stops adjacent to the site on Millbank, two are used as diversion route stops and do not have frequent services.

### **Coach Access**

As an organisation TfL is involved together with the Mayor of London and the Metropolitan Police to ensure pedestrian safety in highly prominent areas, to ensure the safety of highway users, particularly pedestrians.

The applicant is aware of there is an aspiration to impose restricted access to Abington Street - Millbank - Great Peter Street and Millbank - Lambeth Bridge to provide enhanced security in future. As such, coach pick up/ drop off on Millbank would be undesirable. TfL cannot support non-servicing access for vehicles directly outside the site on Millbank North.

The applicants recognise in the TA that existing coach parking in the wider area is under high demand, and a site visit undertaken by TfL officer on the 28<sup>th</sup> January confirmed that this is the case. It is requested that the applicant provides alternative coach access options in discussion with TfL and the Council. A revised Coach Parking Management Strategy should be secured by condition.

Access for Taxis and PHV's will also be required to be reconsidered given the potential changes to the highway outside the site.

### **Potential Highway Changes, Lambeth Road**

TfL have proposals to transform the road layout at Lambeth Bridge. This involves replacing the northern and southern roundabouts with signalised crossroads, improving the existing highway layout by creating dedicated facilities for pedestrians and cyclists and reducing the dominance of motor traffic in the area as part of the Safer Junctions programme.

The public realm will be enhanced with wider footways and clearer crossing facilities for vulnerable road users. This will directly improve pedestrian and cyclist connections to Victoria Tower Gardens, enhancing the look and feel of the area, promoting a sense of place to Lambeth Bridge and its surroundings.

With the coach pick up/drop off taking place away from Millbank North, Gate 5 will become a key entrance for visitors arriving from coach or River Bus. It is appropriate to request s106 contribution towards the Millbank / Horseferry Road / Lambeth Bridge upgrade works in line with similar recent permissions in the area. This would be secured by condition, and the amount of contribution required will be confirmed in due course.

### **Trip Generation and Modal Split**

Trip rates for the proposal have been taken from the Operational Business Plan and other Holocaust Memorials across the world. The annual figure of 1,000,000 annual visitors has been calculated for robustness, while the actual projector visitor numbers are expected to be less (890,000 as the higher-end benchmark figure).

The TA sets out the distribution and assignment of trips via each gate is useful to understand the impact of the development on the local road and footway network. Should an alternatively coach parking strategy be accepted then the gated access on Lambeth Bridge will attract a larger proportion of visitors. The distribution should be updated to reflect this.

The school group trip generation methodology is generally understood however, as school finishes around 3pm is suggested that the hourly profile for school groups is revised to 10am – 2pm to allow for realistic school day timings.

The methodology of the additional visitors to Victoria Tower Gardens is acceptable to TfL. However, as discussed later in this letter the Pedestrian Comfort Level of key footways should be appropriate for the projected increase in pass-by footfall.

### **Healthy Streets and Legible London Signage**

TfL has launched the Healthy Streets Approach, which aims to improve air quality, reduce congestion and make attractive places to live, work and do business, In line with draft New London Plan Policy T2. A Healthy Streets Audit has been completed and whilst, generally satisfactory TfL would disagree that the proposals do not significantly alter how pedestrians will interact with Millbank. TfL considers that the proposal will alter how Millbank operates as well as Lambeth Bridge and Victoria Gardens given the major increase in visitor numbers and associated footfall.

The applicant identified a localised pinch point outside of Gate 1, the northern entrance to the Gardens where a security booth and second parallel barrier constrain the width of the footway to 2.3m. A small modification to the layout of the barrier is therefore required to remove the obstruction directly outside Gate 1. The council shall secure the cost toward proposed alteration.

A Pedestrian Comfort Level (PCL) assessment has been carried out. While it considers that the existing Millbank access gate is of PCL C+ to A+; and this is expected to remain the same in future scenario. However, TfL considers that the PCL of this site as a 'Tourist Attraction' should be of minimum PCL of B+, therefore improvement would be needed to achieve this to cater for the significant increase visitors to the area.

It is considered improvement to wayfinding would be essential to direct visitors to the most appropriate route to and from the site, making the most of traffic free routes where available and promoting the use of certain gates to the site, in particular if coach pick up/ drop off will take place away from the site. As such, a financial contribution toward providing addition way-finding 'Legible London' signage should be secured.

### **Cycle Parking and Placement**

Cycle Parking is to be provided in line with the minimum Draft London Plan standards, as for D1 Non-Residential Institution and cycle parking provision should be set out for all land uses on site including the café and learning centre. It should be noted that one

long stay space should be provided every 8 full-time staff within the Memorial boundary.

Visitor Sheffield stands are proposed to be provided on street by adding to the existing provision on the western side of Millbank opposite the site. The Sheffield stands located in a row to the north of Dean Stanley Street are to be extended by 10 stands (additional 20 spaces) and row north of Horseferry Road roundabout are to be extended by 7 stands (14 spaces). As WCC are the highway authority and the body responsible for the VTG they will therefore need to advise on the acceptability of the cycle parking location.

In any case cycle parking must be in a suitably close location(s) and must not impede on other highway requirements. Any new on street parking should be well integrated with the public realm. It should be sensibly located to enhance the safety of the area. and be designed in line with London Cycle Design Standards, taking into account of the proposed access restriction.

### **Car Parking**

TfL are content that given the nature of the development and its location, additional blue badge parking spaces are not required on site. The applicant should discuss with the Council on blue badge provision in the area and provide a contribution towards other accessible modes to address any shortfall. It is welcomed that no general parking would be provided.

### **Servicing and Deliveries**

TfL's preference in line with Policy T7 of the Draft London Plan is for servicing to be off-street where possible. The scheme proposal includes refuse servicing within the gardens which is accessed via gate 3 (opposite Dean Stanley Street). This access would only be operational when the Memorial is closed and outside bus opening hours. Bollards are proposed on the footway and crossover to ensure safety which is welcomed.

It is stated that refuse vehicles will enter and exit the site in forward gear, more information is required to understand how it moves within the site. It is expected that there would be sufficient room to turn without encroaching onto public garden space.

It is understood that servicing and deliveries will be taken from Millbank via a new 7m servicing bay which is part of the existing bus lane. On street servicing should be regulated with signage indicating appropriate loading times. Given the potential closure of Millbank to vehicle traffic, alternative delivery locations should be strongly considered.

Once the servicing strategy is agreed with the Council and TfL a Delivery and Servicing Plan (DSP) should be secured by condition. The DSP should clearly identify how the development contributes towards achieving the Mayor's target of reducing freight traffic in the central London morning peak by 10% on current levels by 2026, and to reduce total London traffic by 10-15% by 2041.

### **Site Construction**

The Construction Logistics Plan suggests a 2 year build time, between 2020 and 2022. This should be discussed with WCC in order to understand if the timing of the works can be accommodated with the neighbouring construction works. The cumulative impact of development in this area should not affect the SRN, TLRN or indeed, any local borough roads.

Given the sensitivity of the area a strict delivery schedule will need to be agreed with WCC and TfL and be adhered to. This should be secured by condition. Construction in this Central London location raises challenges and must be mitigated, managed and monitored to ensure that there is minimal disruption.

Given the location of the site in proximity to the River Thames, it is welcomed that construction deliveries and waste disposal by boat are going to be considered by the developer.

### **Travel Plan**

A Workplace Travel Plan should be provided and secured by condition. The TA states that 20 staff will be employed at the site. The Travel Plan should set out mode share targets to encourage staff to travel to the site sustainably from the outset.

### **Mayoral Community Infrastructure Levy (MCIL)**

The development will be subject to Mayoral Community Infrastructure Levy as well as Crossrail s106 levy. In June 2017, the Mayor published proposals for an MCIL2 to contribute to Crossrail 2 funding which would be levied in 2019. The applicant should ensure they are fully aware of the regulations.

### **Summary**

The site is located in a highly accessible central location on A3212 Millbank North which is part of the Strategic Road Network. Due to the aspiration to impose restricted access to the Millbank area to provide enhanced security in the future TfL cannot support non-servicing access for vehicles directly outside the site on Millbank North. Alternative coach access options should be discussed with TfL and WCC and a revised Coach Parking Management Strategy should be secured by condition.

TfL have proposals to transform Lambeth Bridge creating signalised crossroads to create a safer environment for cycling and walking. S106 contributions will be required for these works.

Given the sensitivity of the area a strict delivery schedule will need to be agreed with WCC and TfL and be adhered to. This should be secured by condition.

Yours Sincerely,

Chloe Flower

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