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Development Planning  
Westminster City Hall  
64 Victoria Street  
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18 January 2016

Dear Matthew

**Garden Bridge Operations Consultation, August 2015  
Representations from Waterway Properties Limited Ref NJB/FLO/6925**

We write in relation to the comments received from Waterway Properties Limited on 19<sup>th</sup> October 2015 in relation to the consultation on the proposed plans for operation of the Garden Bridge, specifically related to conditions 19, 20, 28, 29 and 33.

The Garden Bridge Operations Reference Group, of which the owners of Arundel Great Court (AGC) are members, has considered in detail a number of the issues raised in their response letter. Responses to each point are included below. The Garden Bridge Trust (GBT) would be very happy to discuss these matters in more detail with Westminster City Council and/or AGC.

1. The Transport Assessment conducted by Arup supported by pedestrian number counts and independently verified by Steer Davies Gleave is the most robust information available to support all operational planning on the Garden Bridge. A Westminster City Council were made aware of AGC's concerns regarding the forecast number of visitors to the bridge as part of the consideration of the planning application. Officers did not support the objection from AGC and the Middle Temple that the predicted number of expected visitors to the bridge has been materially underestimated. The review mechanism for the Operations Management Plan, required under the S106 obligation, will allow for any increases in expected visitor numbers to be appropriately managed.
2. The GBT has pressure tested the pedestrian modelling to look at increases in average visitor dwell times to 30 and 40 minutes. Although very unlikely to occur (less than once a year), the Trust has developed contingency plans to

manage visitors within the space available on the roof of Temple Station, should these situations arise. These plans are included in the Crowd Management Plan.

3. Even in the unlikely event that queuing would be required (see above), visitor numbers can be managed within the space available on the roof of Temple Station. Queues will not form on street level and therefore crowd management off the Garden Bridge is not required.
4. Visitor Hosts will be appropriately qualified and trained to operate the Garden Bridge safely. Visitor Hosts will be supported by technologies that are presently being investigated including crowd-counting technology such as CCTV and Wi-Fi monitoring so that crowd management systems can be deployed in advance of them being required. The number of visitor hosts will vary throughout the year based on visitor demand, as has been discussed at the last two meetings of the Operations Reference Group.
5. Nearly 60% of visitors to the Garden Bridge are predicted to be existing visitors to the Southbank and, from Monday to Friday, around a third are commuters who are not expected to linger as they cross the river. The crowd management measures are robust and validated by the modelling undertaken. As set out above, the Garden Bridge Trust has pressure tested the pedestrian modelling to consider the impact of increases in average dwell times to inform the contingency arrangements set out in the Crowd Management Plan.
6. The GBT acknowledge that there will be fluctuations in demand and dwell time during the day and weather will be one of the factors that influence these fluctuations. The comment at point 6 assumes that all the visitors who represent the 'pent up' demand would arrive at the same time once prohibitive weather conditions cease and create a significant spike in visitor numbers. This scenario is considered unlikely given the range of alternative attractions, available across a wide area, that potential visitors could go in the event of wet weather. Furthermore, the summer peak assumptions are based on favourable weather conditions and an overall reduction in visitor numbers is expected in adverse or changeable weather conditions. Even if the assumption is considered realistic, the GBT will have appropriate mechanisms in place and sufficient resources on site at summer peak periods to address sudden increases in visitor numbers.
7. Please refer to the Garden Bridge Illegal Trading, Anti-social Behaviour Crowd Control and General Enforcement Management Plan and points 2 and 4 above.
8. The risk assessment is based on an understanding of the prevailing crime and security issues in the area and how these might impact on the bridge. The operational measures designed to address these risks on the bridge have factored in the possibility of displacement and the need to develop

collaborative activity with local partners (see the response to question 9 below). Whilst operational activity will primarily be focused on the bridge, the proposed operational measures also take into consideration issues that occur within the immediate area. The risk assessment is appropriate to the infrastructure the GBT are proposing and is in line with Centre for the Protection of National Infrastructure (CPNI), Counter Terrorism Security Advisor (CTSA) and the local Design Out Crime Officer (DOCO) guidance.

9. The GBT have established an extensive network of links with stakeholders to help develop a thorough understanding of the local area, public realm and transport network. The GBT will continue to develop and use these contacts to ensure that we remain fully sighted on all relevant issues. The GBT's understanding of the current operating environment in the immediate area will only improve as we move towards formal opening of the bridge. During operational mode the GBT would ensure that Visitor Hosts interact with neighbouring resources on either side of the bridge so that activity is communicated and the impact, if any, is managed.

The GBT see jointly developed plans to manage the immediate area as very much part of core business practice. To support the GBT's enforcement activity, as detailed in the operational plans, it is the GBT's intention to obtain Community Safety Accreditation Scheme (CSAS) accreditation for the Visitor Hosts. Amongst a range of related issues, the GBT are currently considering the geographical boundary within which it would be appropriate for GBT Visitor Hosts to use these enforcement powers. This might include, subject to agreement with local stakeholders an agreed area beyond the physical garden bridge boundary.

10. Regarding the comments on Visitor Hosts, please see point 4 above. Information on the nature and extent of the CCTV coverage has been provided to attendees at meetings of both the ORG and Security & Crowd Management Working Group. For obvious reasons it is not appropriate to publish details relating to CCTV in a publically accessible format.
11. As previously mentioned, the OMP does factor in the impact of the bridge operation on other sites in the area. Any specific 'sensitive uses' at AGC would need to be communicated explicitly to the GBT so that reassurance can be provided that these issues have been considered.
12. Whilst it is possible that there maybe 'knock on' impacts as a result of construction of the Garden Bridge, these are very subjective in nature. For example, more people could generate more waste but more bins appropriately emptied should mitigate such an impact. It is possible that people purchasing from shops located around Temple Place and Arundel Street leave the waste from these outlets on the bridge given the existing challenges with on street waste collection. There is also an existing issue of street urination in the area

as highlighted by Northbank BID as result of the low footfall in the area. It could therefore be argued that the increase in natural surveillance, as a result of the increased footfall in the area due to the Garden Bridge and the redevelopment of Arundel Great Court, that these types of activities would be greatly reduced, thereby improving the area.

13. The Garden Bridge Trust is not required to consult on the Event Management Plan, however for completeness, the current details for event management are included in the consultation leaflet. It has also been discussed extensively at the Operational Reference Group. The OMP for the North Landing is also the subject of a separate condition, to be discharged prior to the opening of the bridge.
14. Point 14 is an accurate representation of the GBT's intentions.
15. The diagrams referred to are indicative and, as noted in the letter, the highway layout is the subject of a different planning condition and does not form part of this application.
16. The GBT has developed a capacity led plan for the small coach demand that is estimated (0.7% visitors at Summer Peak). Discussions with WCC on coordination and enforcement will continue prior to opening the Garden Bridge.
17. Although alighting and boarding into and from the highway is not ideal, road speed assessments indicate this can be safely achieved if required.
18. The use of unloading bays will be reviewed in the next iteration of the OMP six months prior to opening once the final layout of Temple Place and Victoria Embankment are known. The GBT will commit to work with all our neighbours to minimise impact on the road network and utilise existing resources including existing loading bays. It is worth noting the most frequent servicing trip at the North Landing is a single waste collection once a day.

The Trust welcomes the opportunity to discuss these matters further should Westminster City Council or the respondent wish to meet.

Yours sincerely



Adam Down

Head of Operations – Garden Bridge Trust

Cc: Gerald Eve