



GERALDEVE

Matthew Mason
Development Planning
Westminster City Hall
64 Victoria Street
London
SW1E 6QP

72 Welbeck Street London W1G 0AY
Tel. [REDACTED]
www.geraldeve.com

19th October 2015

Our ref: NJB/FLO/J6925

Dear Sir,

**Temple Station Buildings, Victoria Embankment, London, WC2R 2PN
Representations from Waterway Properties Limited in Relation to Application References
15/08456/ADFULL; 15/08457/ADFULL; 15/08654/ADFULL; 15/08497/ADFULL and
15/08498/ADFULL for the Discharge of Conditions 19; 20; 28; 29 and 33**

We write in relation to the application refs. 15/08456/ADFULL; 15/08457/ADFULL; 15/08654/ADFULL; 15/08497/ADFULL and 15/08498/ADFULL for the discharge of conditions 19; 20; 28; 29 and 33 of the planning permission dated 22 December 2014 (ref. 14/05095), to provide representations on behalf of the owners of Arundel Great Court.

Representations were submitted to the Garden Bridge Trust on the 31st August 2015 in relation to their Operations Management Plan (OMP), dated June 2015, which covered a lot of the items picked up under the current discharge of condition applications. This letter reiterates a number of the issues raised previously.

A series of issues and concerns have been raised as part of the review of the documents submitted pursuant to condition 19; 20; 28; 29 and 33 in relation to the extent of potential impacts of the proposed Garden Bridge on the local area, public realm and transport network. These issues and concerns are set out below.

1. The Garden Bridge has the potential to become one of the key internationally recognised tourist attractions in London and will provide an attractive pedestrian link across the Thames. Given the existing visitor numbers to the South Bank (circa 25 million per year) and Covent Garden (circa 40 million per year), coupled with the potential for Temple Underground Station and the Garden Bridge to become a key access point to the South Bank, we reiterate our general concern that the forecast overall number of users/visitors to the Garden Bridge, as well as the spikes in demand (particular during the summer), could prove to be a significant under estimation.
2. The Garden Bridge Trust (GBT) should assess what impact a significant increase in users/visitor numbers would have on the local area, public realm and transport network and whether the current design and operation plans could accommodate a significant increase in users/visitors and spikes in demand without causing adverse impacts on the local area, public realm and transport network.



3. The GBT recognise the potential need to use the roof of Temple Underground Station for crowd and queue management, though the line of responsibility for crowd management on and off the Garden Bridge remains unclear.
4. The crowd management strategy is highly dependent on the Visitor Hosts being able to assess the need for and then to implement the crowd and queue management procedures at very short notice. Given the extensive duties and responsibilities of the Visitor Hosts it is fundamental there are sufficient numbers of Visitor Hosts present at the Garden Bridge at any given time to be able to effectively carry out all of their required duties and responsibilities. At present, no details are provided on the minimum number of Visitor Hosts needed to be on site at different times throughout the year.
5. The more successful the Garden Bridge becomes as a key London tourist attraction and the more it is recognised as a garden the greater is the potential for increased demand and dwell times, which together significantly affect whether the bridge reaches capacity levels.
6. Furthermore, the Garden Bridge is a free, open air, non-ticketed attraction and as such demand and dwell times will be highly influenced by weather conditions and this will inevitably lead to significant spikes in demand and dwell times. It is essential that appropriate resourcing levels are put in place to manage the unpredictable timing of these spikes during a day. For example, if it rains during the early afternoon of a peak summer day before clearing to become sunny then the pent up demand, from visitors who delay visiting the bridge whilst it is raining, converge on the bridge when the weather clears to create a significant spike in demand.
7. As mentioned above, the crowd and queue management procedures are highly dependent on quick and effective action by the Visitor Hosts and therefore it is essential that the Garden Bridge Trust puts in place adequate resources to ensure there are sufficient numbers of Visitor Hosts present at the Garden Bridge to cope with the unpredictable nature and timing of spikes in demand. At present there is no clear commitment to the minimum number of Visitor Hosts, who have considerable wide ranging responsibilities and duties that may arise at the same time as the need for crowd and queue management.
8. The crime related risk assessment has been confined to the Garden Bridge itself and has not assessed or identified assets to be protected or vulnerabilities off the Garden Bridge.
9. The GBT appears not to accept any responsibility for any impacts that may occur off the Garden Bridge and we assume WCC and the Metropolitan Police accept full responsibility for dealing with any impacts that may occur as a consequence of the Garden Bridge, but off the Garden Bridge, e.g. illegal trading, anti social behaviour, crime, waste and public realm infrastructure.
10. The Crime Prevention Statement refers to the north landing generally falling within the scope of the video surveillance, but no specific details are included in the document other than the reliance placed on the Visitor Hosts to provide the effective capable guardian resource. As mentioned previously, the Visitor Hosts have a significant level of responsibilities and duties, but no real detail is provided on the minimum number of Visitor Hosts to be present at any given time to fulfil all their required duties and responsibilities.
11. The documents submitted pursuant to conditions 19; 20; 28; 29 and 33 need to have specific regard to the other sites in the surrounding area, including Arundel Great Court.

The documents have no regard to the sensitive uses at Arundel Great Court and do not sufficiently look at any cumulative impacts of the sites in the surrounding area.

We note that submissions have not yet been made in relation to the permanent highway layout (Condition 23) or the coach and taxi management plan (Condition 21) and that these details still require formal approval. We also note that the travel plan is to be submitted for approval pursuant to the s106 agreement along with the OMP. However, we wish to reiterate the representations we made to the Garden Bridge Operations Consultation document on the 31st August 2015 in relation to these topics.

12. The various operations and management plans have only considered and assessed the potential impacts that may occur on the Garden Bridge and have not considered or assessed the impacts that may occur off the bridge as a consequence of the Garden Bridge.
13. The Operations Consultation document dated August 2015 refers to an Event Management Plan, but no such plan has been provided for review as part of the consultation. The Event Management Plan is a fundamental part of the OMP and should form part of the consultation. Also, no OMP for the roof of Temple underground station has been presented as part of the consultation.
14. We understand the GBT confirmed at one of the Operations Reference Group meetings that no events (large or small) would be held on the Garden Bridge except during the permitted 12 event days when the bridge is closed to the public and there would be no events (large or small) on the roof of Temple underground station.
15. The various diagrams showing the north landing area, including Temple Place, do not depict the proposed Temple Place highway layout discussed with Arundel Great Court and does not accommodate the requirements discussed with the GBT. We note the highway layout is subject to approval of another planning condition and does not form part of this consultation.
16. The use of the coach bay on Temple Place is highly dependent on an effective and coordinated management approach between Westminster City Council (WCC) and the GBT, as well as clear and defined enforcement responsibilities. At present the responsibility for the management and enforcement of the coach bay is unclear between WCC and the GBT.
17. There are health and safety issues associated with coach passengers alighting into the highway of Temple Place.
18. The Travel Plan states no unloading bays are required on the north side of the Garden Bridge for services or deliveries as there are three existing bays in the immediate vicinity on Victoria Embankment. The delivery and servicing plan should therefore provide that all deliveries and servicing for the north side should be from these existing bays (other than in the case of the waste collections which is to be collected to the east of the Temple Place junction with Arundel Street) and also any deliveries and servicing should be undertaken at times outside busy peak times of Temple underground station.

The submission of the OMP is a requirement of the S106 agreement which means that our client will not get the opportunity to provide formal representations. As stated above, a major concern is about how events are managed and governed to avoid adversely impacting on the surrounding

area and neighbours. The Event Management Plan, which was referred to in the public consultation but not included as a document, is not covered by any planning condition but we believe is a fundamental part of the overall OMP and therefore should be submitted for approval.

We hope that the above comments will be taken on board by Officers when considering the applications.

Yours sincerely



Gerald Eve LLP

Cc: Waterway Properties Limited