

GENERAL INITIAL COMMENTS

- Impact of any changes on cyclists on Millbank plus surrounding highway.
- While I accept a Stage 1 Road Safety Audit perhaps isn't suited for the proposal, some form of fully independent safety assessment of the proposal should be considered. A form of peer review may be acceptable and I'm happy to discuss this further, once you have given it some consideration.
- Are the footway widths of sufficient to cater for the additional activity (including groups waiting to be collected) and not adversely impact on existing pedestrians? Is this to be managed – if so by whom, how and under what powers?
- Need to be very clear about what activity is to occur on highway (footway and carriageway) and how this will affect other highway users
- S 42 and TRANS 20 require off-street servicing – there will need to be detailed justification on why this isn't being pursued. The current proposals are unacceptable.
- It would appear at the moment, as a minimum, the proposal requires highway space to be allocated to blue badge parking, cycle parking, an on-street servicing bay, coach parking and waste collection. This is significant loss of highway space for non-highway uses and unacceptable.
- The servicing area appears to include security screening. Why should this occur on highway? What is the impact on other highway users (including safety implications for both highway users and people undertaking the screening in live traffic lanes)? How will pedestrians be impacted and protected? Is this safe for cyclists?
- Is a combined off-street servicing (including waste) area with Houses of Parliament/Parliamentary Visitor Centre an option?
- Has freight consolidation been considered?
- Any change to the highway is unlikely to be able to be protected for just the NHM use. Specific on-street loading, servicing, blue badge or other types of bay are highly likely to be used by others and not available for the intended users. A smarter informed solution needs to be progressed. This may be through a use of single and double yellow lines and kerb blips (loading restrictions). Consideration should also be given to existing dispensations within the operation of the CPZ – however I would not rely on these to make the NHM acceptable.
- As all highway within Westminster is in high demand to support the movement of people and the functioning of the city, the justification for using highway to support the proposed use will need to be clear and robust. It should not be assumed that highway space can be allocated to the proposed use from other users. The impacts of any changes will need to be assessed on the local street network as well.
- There will need to be a strategy to accommodate taxis and private hire vehicles. It is unlikely that any additional specific highway space will be able to be allocated to accommodate them. There is a potential that their activity will conflict with coaches. You will need to address how this will be covered.

- You will need to have discussions with TfL on the both the bus lane and bus stops. It is strongly recommended you utilise the TfL borough planning pre-application service and receive a formal co-ordinated written response. Individual discussions may lack the overview and agreed response required for the proposed NHM. When received, items raised within the TfL response will need to be further discussed with WCC
- Broadly, Westminster accept this site is well serviced by public transport (the TfL PTAL is accepted). However, given the estimated number of visitors, significant justification will be required to demonstrate capacity on relevant services and modes of transport.
- A form of travel plan is likely to be required, but it is questionable if the “standard” format is suitable. It may be that separate staff and visitor travel plans are a way forward. A travel plan may be a good place to include commitments on information that will be provided when people book a ticket, information contained within advertising/publicity about how to get to the NHM etc. This should include “mock” web pages, adverts, ticket stub layouts etc. Commitments to what information is included with what information source will be required and agreed. Careful thought will need to be given to the information provided around car parking. I would suggest a “no on-site or on-street car parking” concept is considered, including for disabled. The impacts of advising of car parking availability will need to be considered. A robust approach now may assist in lessening the impacts later.
- Long term cycle parking will be required for staff use. This should be secure, weather proof (ie covered and self-contained). We will need to discuss numbers further – however it is likely to be at least 10% of the maximum number of staff on site at any one time. Short term cycle parking will also be required for visitors to the NHM and must be incorporated into the design. It should be close to main entry points to the NHM. Again numbers will need to be agreed, but should at least match the number of visitors allocated to cycling mode in transport assessments/trip generation figures. No cycle parking should be located on the highway.
- Waste storage will be required for the NHM and ancillary uses. You are advised to discuss further with Saheed Oluwadipe to ensure capacity and types both within the NHM and its surrounds (this is likely to include additional bins through the park for increased visitor activity). All waste storage and collection should be from within the site and not from highway.
- Any changes to the highway to accommodate the development, updating of Legible London signage, will need to be fully funded upfront; as well any soft measures which will need to include clear long term funding commitments (eg signage, professional travel plan officer, travel plan surveys, travel plan annual reviews etc)
- The park currently closes at dusk, which is 4.00pm in the winter. Is this to be extended? What is the impact of extending the hours?
- The media currently make use of the area. What is the impact of the proposal on this activity? How is this accommodated?
- Air quality will be a wider consideration, from assumptions made with regards to transport matters
- The temporary planning permission relating to the Parliament Learning Centre needs to be addressed, including impact on assumptions.

COMMENTS ON DOCUMENT

Note – a number of comments are posed as questions. Direct answers are not expected, but the issues need to be clearly addressed or scheme modified to address points raised.

Para 1.2.1 – is the site not surrounded by railings and able to be closed to entry? Is there value in having an assessment of what/how the park is currently used and how this will be affected/displaced?

Chapter 2 – more work needs to be undertaken to demonstrate consistency with the relevant policies. It would be helpful to have each specific policy addressed through a clear statement of how the NHM is consistent.

Para 2.4.11 – missing TRANS 3

Para 2.4.19 – superseded by London Plan Policy 6.3

Para 3.2.6 – is this the limit of the site? Is a larger area not required for the site to function?

Para 3.2.8 – how often are buses on diversion/using these bus stops/routes?

Para 3.2.12 – given the central London location, how does the distance between the tube station compare to other similar venues?

Para 3.2.15 – is this part of Millbank a Red Route (see para 3.2.16)?

Para 3.2.19 – Given this is not formally in the public domain, and is a concept only being considered at very early stages, how this is addressed will need further discussion but it will be addressed in more detail

Para 3.3.1 – vehicles with more than 9 seats are exempt? Where do they get this from? What is the impact of this? Affect of London Lorry Control Scheme?

Para 3.3.3 – Atkins study will need to be provided for consideration. Is it up to date? Is a new study required?

Para 3.4.1 – study not seen or agreed. Is “no designated space” a correct statement?

Figure 4 – is footway really a bus stop (repeat for each kerb type illustrated)?

Para 4.2.2 – where are most of the visitors arriving from? Given this, is the layout of the site intuitive/obvious/logical? What impact does the location of the memorial screening point have on highway activity?

Para 4.3.3 – given these requirements, why is the correct location for the NHM? What impact does this have on the highway and highway users?

Para 4.3.5 – This is unacceptable.

Para 4.3.8 - cycle parking space for staff seems limited. How many staff will be on-site at any one time? What is the ratio of cycle parking for staff? What is the cycle parking ratio for visitors? Cycle parking must be secure, weather proof, accessible and within the development site, as per any development.

Para 4.3.9 – This is unacceptable. If there isn't space within the site, why is it acceptable for highway to be used for this?

Para 4.4.1 – This is unacceptable. Is off-site freight consolidation an appropriate solution?

Para 4.4.2 – This is not functional and not able to be controlled on highway. See comments above in general text as well.

Para 4.4.3 – it would appear this function is being retrofitted into the design, leading to a number of significantly adverse impacts on highway users

Para 4.4.5 – what other TMO are required to accommodate the current servicing proposed? What are the security implications of these proposals?

Para 4.4.6 – is this legal activity? What is TfL's view on the proposals? Overall, the servicing proposals are not acceptable.

Para 4.4.8 – This is unacceptable.

Para 4.4.11 – 20 minutes seems a long amount of time to load and unload. How does this work with predicted arrivals and departures?

Para 4.4.12 – you need to provide solutions to the impacts of your development

Para 4.4.19 – Which WSP? Is it appropriate to reference this here?

Para 4.4.20 – is this achievable? What is the impact of this on highway users? What type of bollard? Who controls it?

Chapter 5 – Overall difficult to comment without other elements of proposal (including ticketing processes/management) being provided.

Para – 5.1.1 – what is maximum occupancy of total site? What crowd management is to be in place?

Para 5.1.2 – what evidence?

Para 5.1.4 – if on-the-door ticketing the majority – is this not a significant problem in managing arrivals and departures (also contrary to previous informal discussions)? Also, ticket booth in Parliament Square?

Para 5.2.1 – linked from/to where?

Para 5.2.2 – impact of each different type of visitor?

Para 5.2.3 – how many people visit both the Houses of Parliament and Westminster Abbey? What is this as a portion of visitors to each site?

Para 5.2.5 – not seen Operational Business Plan. How do these figures compare to estimates and reality of other memorials/sites?

Para 5.2.7 – it would be helpful to have actual figures here – a table maybe to support?

Para 5.2.8 – how are time slots for on-the-day arrivals to be different from pre-booked arrivals? Is there a conflict to be managed?

Para 5.2.9 – The population of London is 8m or so how can there be 925,000 pupils in year 9 (is this a phrasing error)? Why would the majority of students studying the topic not wish to visit the memorial?

Para 5.2.12 – you really need to set out your case for consideration first then discussion

Para 5.2.15 – while this may be correct, the local highway network (especially for pedestrians) must be detailed as well.

Para 5.5.13 – How many visitors to the café?

Para 5.2.19 – the premise of on-street blue badge bays is not agreed

Para 5.2.20 to 5.2.4 – a much stronger evidence base is going to be required. It isn't clear how you've drawn your conclusions. Impact of arrivals by private motor car are of concern and must be addressed, with an agreed evidence base.

Para 5.2.26 – given hotels in the nearby area, this statement perhaps needs clarity

Para 5.2.27 – this approach depends on hours of operation of the NHM. Suggest analysis needs to include commuter periods.

Para 5.2.8 – this piece of work will need careful consideration. What is the impact of people crossing Millbank on other highway users?

Para 5.2.29 – Parliament Square ticket booth?

Para 5.2.32 – “whilst also recognising the coach parking limitations” – is this really why a school would visit two separate in one day – or just a helpful by product? Where is the coach going when not dropping off or collection students/groups? What is the impact of these movements on the highway network and other highway users?

Para 5.2.33 – assumption evidence base required (repeated throughout)

Para 5.2.36 – is it only visitors from outside London arriving by coach to the PLC? Coach bays or a length of kerb for drop-off/collection activity?

Para 5.2.40 – how does this fit with “over 8/9 people” referenced in earlier in document? Why 50?

Para 5.2.44 – will there be peak periods? Start of day/after lunch? How does this affect the number of visitors and coaches? Is there a conflict between arrivals and departures around “lunch”

Para 5.4 – extra waste from people using the gardens? Extra bins required in surrounding area? Impact on cleansing requirements?

Para 5.4.4 – impact on highway and highway users? Time on highway? See comments on servicing from highway.

5.5.2 – see commentary above.

Para 5.5.4 - how would a reservation system work and be controlled? This sentence highlights just some of the unaddressed problems with the entire approach outlined in dealing with the impacts of the NHM.

Para 5.5.7 – see comment for 5.5.4

Para 5.5.9 – is there sufficient capacity within the footway for this increased activity? What is the impact on other (existing) highway users?

The proposal is clearly still very much a work in progress and limited information has been received to comment on, including ticketing arrangements and other reports referenced in the document (not seen or agreed including process or outcomes). Therefore these comments are definitely an initial informal first steer and should not be considered to be acceptance of any of the proposals or the complete feedback. The above list is in no particular of order and all points should be considered equally before further discussion.