



Ministry of Housing, Communities & Local
Government

UNITED KINGDOM HOLOCAUST MEMORIAL AND LEARNING CENTRE

Transport Assessment





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PROJECT NO. 70040431

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DRAFT

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1. INTRODUCTION

1.1. APPOINTMENT

- 1.1.1. WSP has been appointed by the Ministry of Housing, Communities & Local Government to provide transport consultancy to support the Development Proposals of the UK Holocaust Memorial and Learning Centre (UKHMLC). The site falls within the Victoria Tower Gardens located in the administrative boundary of Westminster City Council (WCC) and is within a short walk of the Houses of Parliament and Westminster Abbey.

1.2. DEVELOPMENT SITE

- 1.2.1. The UKHMLC is proposed to be located within Victoria Tower Gardens, an open space which is bounded by Millbank to the west, the River Thames to the east, the Palace of Westminster to the north and Lambeth Bridge to the south. In total, the Gardens have five entrances – four accessible from Millbank and the fifth from Lambeth Bridge.
- 1.2.2. **Figure 1-1** shows the location of the proposed Memorial. Note that the UKHMLC does not occupy the entirety of Victoria Tower Gardens and this development will largely take place in the southern end of Victoria Tower Gardens.

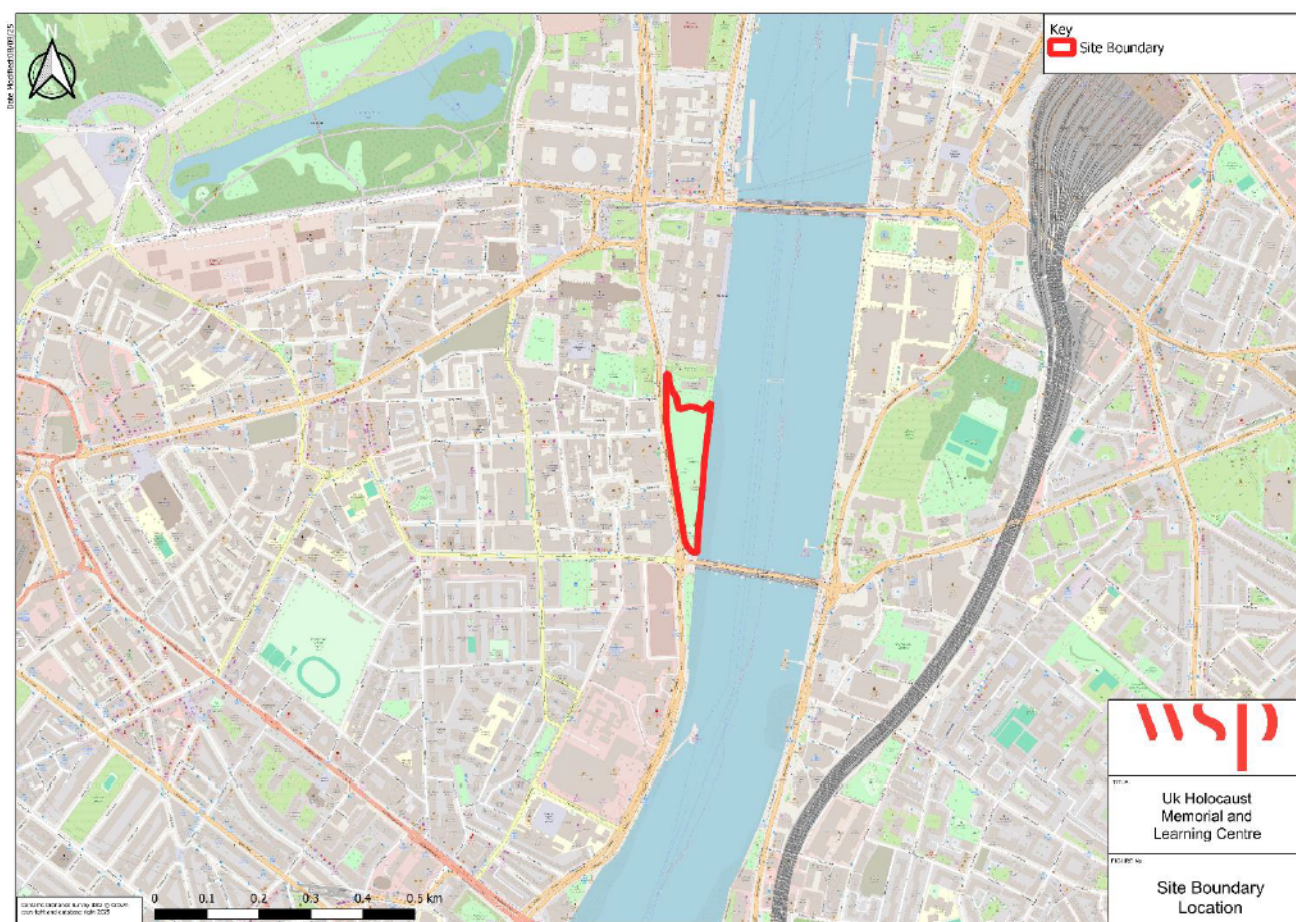


Figure 1-1 - Indicative Site Boundary

- 1.2.3. The site is currently used as a park and thoroughway for pedestrians and cyclists and is open from dawn until dusk. The gardens are part of the Jubilee Greenway walking and cycling route from Westminster Bridge to Buckingham Palace, an important heritage route that marks the Queen's Diamond Jubilee and the London 2012 Olympic Games with parks and monuments across central London.

1.3. PROPOSED DEVELOPMENT

The Applicant has updated the design of the development in minor respects in response to regulatory and other changes since the Planning Inspector's Report in April 2021, which are assessed in a suite of application documents being submitted alongside this TA. The documents also present design options in response to matters arising from the House of Lords Select Committee made during the consideration of the Holocaust Memorial Bill (now the Holocaust Memorial Act, having received Royal Assent in January 2026).

- 1.3.1. A Transport Assessment was produced by WSP in November 2018 for the 2019 application. Due to of the very minor nature of proposed changes to the Development Proposals, many of the plans regarding transport infrastructure have been retained and updated to reflect the new architectural drawings. Within this TA, attention is paid to any changes in the surrounding transport network which will affect the sites impact on the surrounding transport network. Noting that changes that have been surveyed or observed are very minor in nature and do not have a significant impact on the previously drawn conclusions.
- 1.3.2. Additionally, the latest UKHMLC application also takes the latest fire safety requirements and building regulations including 5839-1:2025 and 5839-9:2021 into account. Design amendments made as a result of this do have not resulted in any change in transport related proposals.
- 1.3.3. Various design options have been set out in response to the House of Lords Select Committee since the project received Royal Assent. Upon review, we can conclude that these design changes, if implemented, have little bearing on the contents of this Transport Assessment.
- 1.3.4. As a result of the Assurances provided to the Select Committee, a number of potential changes have been identified in the DAS Second Addendum comprising the following options:

Option 1A: Hedge Boundary to Playground

- 1.3.5. An additional section of hedging would be introduced along the pedestrian Thames walkway and around the inner line of the Spicer Memorial and the existing railings along Millbank.

Option 1B: Installation of new gate on Millbank, and full Hedge/Railing Boundary

- 1.3.6. This option would build upon Option 1A by maintaining a fully enclosed playground with a well-defined, 1-metre high, hedge and metal railing. Each entry point into the playground would be gated, including the introduction of a new gate off Millbank. This new dedicated entrance would be clearly signposted, guiding visitors from the street directly to the playground access point.

Option 1C: Full Hedge/Railing Boundary

- 1.3.7. This option would build upon Option 1A by maintaining a fully enclosed playground with a well-defined, 1-metre high, hedge and railing. Each entry point into the playground would be gated, with a difference to Option 1B being that there would be no new gate entrance from Millbank.

Option 1D: Removal of Café Kiosk

- 1.3.8. The café and kiosk would be removed, and the space reduced so as to only accommodate essential services— namely the back-up generator and cycle parking. This change would enable the playground area to increase further southward.

Option 1E: Reorientation of Café Kiosk

- 1.3.9. The counter of the café kiosk would be turned toward the Thames Walkway, to avoid potential queues conflicting with users of the playground adjacent.

Option 1F: Buxton Memorial Widened Path

- 1.3.10. The path surrounding the Buxton Memorial could be widened by 0.5 metres, providing additional space for visitor circulation.

1.4. REPORT STRUCTURE

- 1.4.1. The remainder of this report is set out as follows:
- Chapter 2 – Policy and Planning Guidance;
 - Chapter 3 – Baseline Conditions – Walking and Cycling;
 - Chapter 4 – Baseline Conditions – Public Transport;
 - Chapter 5 – Baseline Conditions – Highway Network;
 - Chapter 6 – Parking and Servicing Survey Results and Analysis;
 - Chapter 7 – Development Proposals;
 - Chapter 8 – Trip Generation and Modal Split;
 - Chapter 9 – Transport Impact Assessment; and
 - Chapter 10 – Conclusion.

2. POLICY AND PLANNING GUIDANCE

2.1.1. This Transport Assessment has been developed with full consideration of the national, regional, and local planning policy and guidance. Careful attention has been played to any policy changes since the 2018 application. The Development Proposals have been prepared in the context of the following planning policy:

- National Planning Policy Framework (2024)
- The London Plan (2021)
- The London Plan, Towards a New London Plan (2025)
- Westminster Local Plan (2021)
- Westminster Local Plan, partial review (2024)

2.2. NATIONAL POLICY

NATIONAL PLANNING POLICY FRAMEWORK (2024)

2.2.1. The National Planning Policy Framework sets out the Government's planning policies for England and how these should be applied and was last updated by the Ministry of Housing, Communities & Local Government in December 2024.

2.2.2. The purpose of the planning system is to contribute to the achievement of sustainable development. At a high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. Chapter 9 relates to the promotion of sustainable transport and states the following;

“Transport issues should be considered from the earliest stages of plan-making and Development Proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. This should involve:

- a) making transport considerations an important part of early engagement with local communities;*
- b) ensuring patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places;*
- c) understanding and addressing the potential impacts of development on transport networks;*
- d) realising opportunities from existing or proposed transport infrastructure, and changing transport technology and usage – for example in relation to the scale, location or density of development that can be accommodated;*
- e) identifying and pursuing opportunities to promote walking, cycling and public transport use; and*
- f) identifying, assessing and taking into account the environmental impacts of traffic and transport infrastructure – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains”*

DRAFT NPPF CONSULTATION

- 2.2.3. The draft National Planning Policy Framework (NPPF), published in December 2025, sets out the Government's intention to strengthen the national role in promoting sustainable growth and achieving greater consistency in planning decisions across England. The consultation, open until 10 March 2026, seeks views on how national policy can better support emerging priorities, including data centres, energy performance thresholds, and greater standardisation in viability assessments.
- 2.2.4. A key feature of the draft is its new structure. The document is reorganised into chapters, each with a clear objective and a distinction between plan-making policies and national decision-making policies. The latter are designed to apply directly to planning applications, and local plans are instructed not to duplicate them. Where local policies conflict with national decision-making policies, they are to be given very limited weight. This represents a shift towards a more uniform national framework, especially significant in areas with out-of-date plans or rapidly evolving policy priorities.

2.3. REGIONAL POLICY

THE ADOPTED LONDON PLAN (2021)

- 2.3.1. The London Plan recognises that transport plays a fundamental role in addressing the whole range of spatial planning, environmental, economic and social policy priorities. It is critical to the efficient functioning and quality of life of London and its inhabitants, having major effects on places, especially around interchanges and in town centres and on the environment, both within the city itself and more widely.
- 2.3.2. The document aims to ensure that London's transport is easy, safe and convenient for everyone, and encourages the use of cycling, walking and public transport. The Mayor's key target, as set out in Policy T1 is that:
- 80% of all trips in London are to be made by foot, cycle or public transport by 2041.
- 2.3.3. The London Plan recognises that London's challenges of guaranteeing its status as an efficient, well-functioning globally competitive city are intertwined with the obstacles and opportunities that transport brings. It states that the integration of land use and transport is essential in realising and maximising growth and ensuring that different parts of the city are connected in a sustainable and efficient way.
- 2.3.4. In order to achieve this, the London Plan acknowledges that a strategic shift is needed to reduce Londoners' dependency on the car, creating a healthy, pleasant and sustainable street environment in which people can walk, cycle and use public transport.
- 2.3.5. 'Policy T2 Healthy Streets' outlines that the Proposed Development should:
- Demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London Guidance;
 - Reduce the dominance of vehicles on London's streets whether stationary or moving; and
 - Be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport.
- 2.3.6. 'Policy T4 Assessing and mitigating transport impacts' states that Development Proposals should reflect and be integrated with current and planned transport access, capacity and connectivity. It is acknowledged that transport assessments should be submitted with Development Proposals where

appropriate and ‘focus on embedding the Healthy Streets Approach within, and in the vicinity of, new development.’

- 2.3.7. Where parking is provided, electric vehicle charging infrastructure should be implemented. In total, 20% of all car parking spaces should have acting charging facilities, with passive provision for all remaining spaces
- 2.3.8. **Policy T5** sets out that development should encourage cycling and provides new cycle parking standards. Cycle parking and cycle parking areas should allow easy access and provide facilities for disabled cyclists. Whilst there are no set standards for UKHMLC uses within the London Plan, D1 Other is considered most applicable. **Table 2-1** below showcases these.

Table 2-1 - Adopted London Plan Cycle Parking Standards (Minimum)

Land-Use	Long Stay (i.e. staff parking)	Short Stay (i.e. visitor parking)
D1 Other (e.g. Library, Church)	1 space per 8 FTE staff	1 space per 100sqm (GEA)
A2-A5 (inc. cafés and restaurants)	1 space per 175sqm (GEA)	Areas with higher cycle parking standards: 1 space per 20sqm (GEA)

2.3.9. **Policy T6** sets out that car-free development should be the starting point for all Development Proposals in places that are (or are planned to be) well-connected by public transport. For leisure use parking, **Policy T6.4** states that within the CAZ and locations with a PTAL 4-6, any on-site provision should be limited to operational needs, disabled persons parking and parking required for taxis, coaches and deliveries or servicing.

2.3.10. With regards to disabled parking, **Policy T6.5** requires that all non-residential elements of a development should provide at least one on or off-street disabled persons parking bay.

HEALTHY STREETS

2.3.11. Transport Assessments are to follow a Healthy Streets structure. Furthermore, TfL advise that a Healthy Streets Check should be included within a TA.

2.3.12. It is noted that the Healthy Streets check score does not show whether a street is healthy or not but indicates the strengths and weaknesses of a street. It is not possible to achieve an overall score of 100%, as to score well against some metrics compromises are needed in other metrics. The check holds no formal status in guidance and decision making but advises designers and decision makers on how a project fits with Healthy Streets policy.

2.3.13. The Healthy Streets check for the Development Proposals is contained in **Section 9.8**.

OPERATING COACHES IN LONDON

2.3.14. TfL provide a guide to restrictions and special parking arrangements for coaches in London, intending to promote more environmentally and socially friendly coach driving. General advice includes:

- Ensuring engines are switched off;
- Avoiding obstructing traffic; and
- Obtaining a permit for overnight parking in advance.

2.3.15. With regards to parking restrictions, the guidance states:

- “If passengers are not seen boarding or alighting, you could be charged with a Penalty Charge Notice (PCN);
- Do not arrive early to load, or remain after unloading;
- Parking or waiting at bus stops is not allowed;
- Stopping is prohibited at all times on double red lines and during restricted hours on single red lines;
- Vehicles registered as busses can use red route bus stops for picking up and setting down, but cannot park or wait;

- Picking up and setting down is permitted on double and single yellow lines, but only while activity is taking place;
- Check signs before using bus stops to pick up and set down as many are restricted to 'local' or TfL busses. Parking and waiting is not permitted at any time;
- There are a number of pay by phone and coach meters where you can park for up to four hours in London."

LONDON PLAN, TOWARDS A NEW LONDON PLAN (2025)

- 2.3.16. In May 2025 the GLA consulted on the next London Plan. There are a number of questions in the document which have been used to request stakeholder feedback on the next London Plan. There are no specific policies referenced which relate directly to the proposal, and due to its early stage of review there is no requirements to assess the Development Proposals against the consultation

2.4. LOCAL POLICY

WESTMINSTER CITY PLAN (2021)

- 2.4.1. The Westminster City Plan is a strategic and detailed policy framework that sets the vision for sustainable development in the City of Westminster up to and beyond 2040. It was devised in 2021 as an updated version of the 20 Strategic Plan. The City Plan along with the Mayor of London's London Plan and any made neighbourhood plans, is the statutory development plan setting out vision and strategy for the development of the city and contains policies to be used in determining planning applications.
- 2.4.2. The Connections chapter of the City Plan 2019-2040 sets out WCC's commitments and policy requirements in relation to sustainable transport, walking and cycling, public transport, parking and servicing.
- 2.4.3. **Policy 25 D.3 Walking and Cycling** outlines the requirement for developments to meet the cycle parking and cycle facilities standards in the London Plan to promote cycling and ensure a safe and accessible environment.

The City Plan details in Paragraph 25.10 that:

"Provision of cycle parking and storage facilities, as well as facilities for cycle hire, are essential in order to encourage this mode of transport".

- 2.4.4. The City Plan also notes in Paragraph 25.11 that pressure from competing users and high PTAL values across the city in combination with the limited space available within the urban environment will mean that:

"Provision of short-stay cycle spaces will not always be appropriate".

- 2.4.5. This is reflected by the analysis suggesting that people don't generally cycle to visits areas like the Central Activities Zone and many of WCC's town centres.
- 2.4.6. New developments should be predominantly car free to support encouragement of travel by active and sustainable modes.
- 2.4.7. The council will apply the maximum non-residential car parking standards in the London Plan, as set out in **Policy 27.C Parking** and notes the prioritisation of alternative kerbside uses (such as car club spaces, cycle parking) ahead of parking for private vehicles.

- 2.4.8. WCC's City Plan **Paragraph 27.11** states that loss of on-street parking is not normally supported however it is recognised that existing on-street parking spaces 'can cater for a wide range of users including residents, short stay parking, and to facilitate loading and servicing requirements at various times of day.
- 2.4.9. The City Plan recognises, in **Paragraph 27.16**, that some operational needs of the proposed use may require dedicated off-street parking; these uses include hotels, leisure and entertainment which can:
- "Increase demand for coaches, minibuses or taxis and parking facilities. Meeting the needs of these vehicles should be considered although parking should only be provided where it is needed for the essential operation of the use."*
- 2.4.10. In relation to freight and servicing, the WCC City Plan acknowledges in **Paragraph 29.1** that Westminster has a high level of demand for freight, servicing, delivery and collection services.
- 2.4.11. **Policy 29** Freight and Servicing outlines the following:
- *"The council will strongly support the provision of consolidated facilities for freight, servicing and deliveries in new development in accordance with emerging London Plan Policy;*
 - *Servicing, collection and delivery needs should be fully met within a development site. Where it is not possible to fully meet the servicing, collection and delivery needs within a development site they must be met in such a way that minimises adverse effects on other highway and public realm users; and*
 - *Applicants will produce Delivery and Servicing Plans which encourage provision for low-emission, consolidation and last mile delivery modes."*

WESTMINSTER CITY PLAN, PARTIAL REVIEW (2024)

- 2.4.12. Westminster City Council is currently reviewing the 2021 City Plan to make sure it meets the changing needs of communities and aligns with the council's Fairer Westminster strategy. Since adopting the City Plan in 2021, WCC has published a new strategy for the city – Fairer Westminster – and to ensure the City Plan is delivering on the commitments within that strategy, there are three policy areas in the adopted plan that need amendments. These include Affordable Housing, Retrofitting, and Site Allocation. These are not considered to be relevant to the UKHMLC application.

3. EXISTING WALKING AND CYCLING CONDITIONS

3.1.1. This section of the report identifies the very high level of accessibility of the site on foot and by bicycle. The existing conditions are largely the same as those outlined in the 2018 application and transport assessment, with the exception of improvements to cycle infrastructure in the local area. The primary change being in relation to the South Lambeth Bridge TfL improvement scheme which is now being implemented and described later in this report.

3.2. PEDESTRIAN ACCESSIBILITY

3.2.1. The Site is located in an area which has a well-established network of footways and formal and informal pedestrian crossing points. Horseferry Street, Dean Stanley Street, Great Peter Street, Lambeth Bridge and Millbank, including a footway along the River Thames, provide the pedestrian routes to the site, and are all in good condition and well lit.

3.2.2. As shown in **Figure 3-1**, Victoria Tower Gardens is accessed by way of four gates on Millbank as well as one more entrance on Lambeth Bridge.

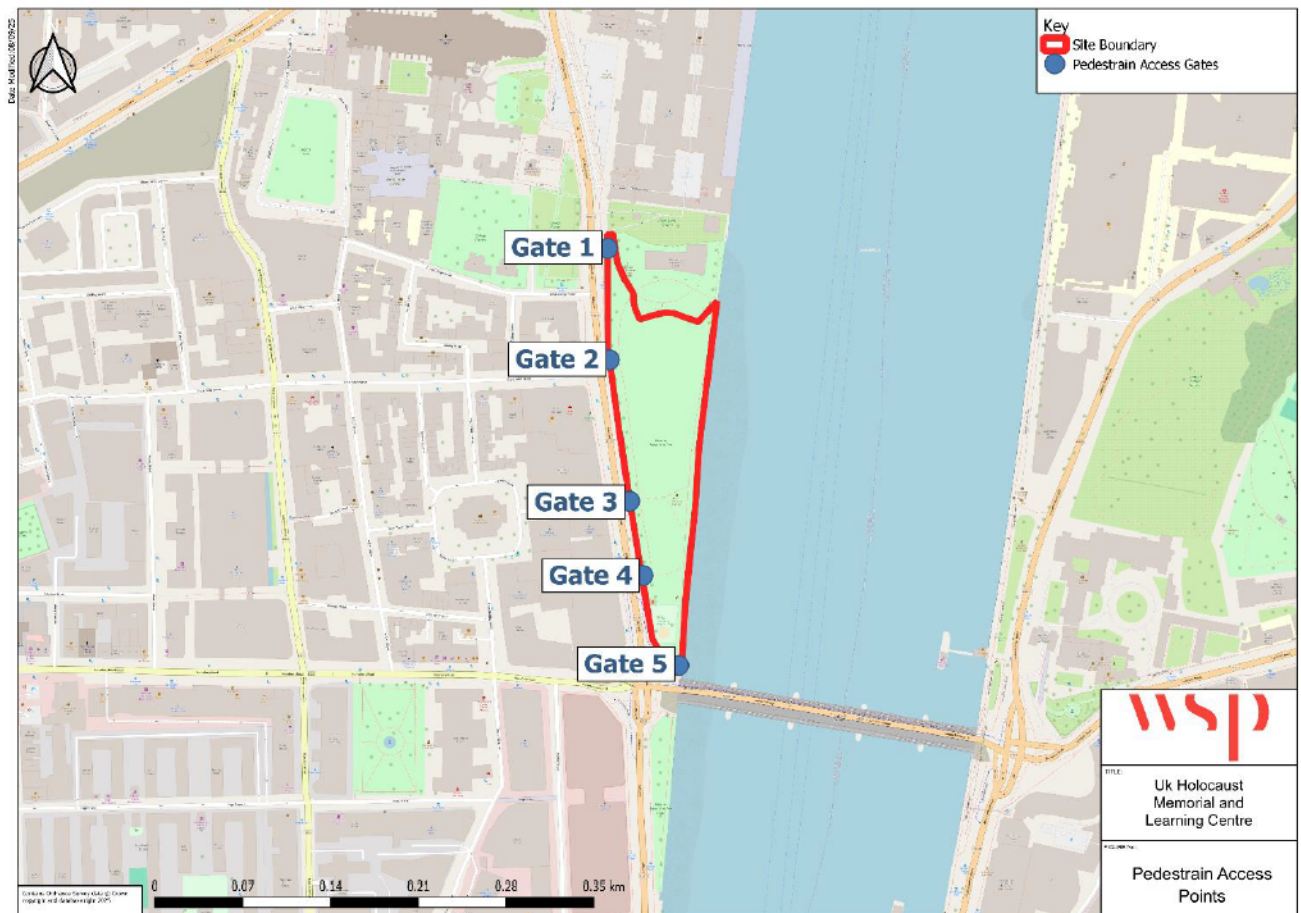


Figure 3-1 - Pedestrian Accesses to Victoria Tower Gardens

3.2.3. There are a number of formal pedestrian crossings to facilitate demand within close proximity to the site. On Abingdon Street at the northern end of Victoria Tower Gardens, there is a pelican crossing immediately south of Great College Street. On Millbank there is a pedestrian refuge crossing facility immediately south of Great Peter Street and a zebra crossing immediately south of Dean Stanley Street.

- 3.2.4. There is also zebra crossings provided on all arms of the Lambeth Bridge / Millbank / Horseferry Road roundabout and pedestrian crossing phases are included on all arms of the Parliament Square gyratory.
- 3.2.5. The site is located within a short walk of major transport interchanges including Westminster station (7 minutes), Victoria station (19 minutes) and Waterloo station (19 minutes), as well as major tourist attractions including the Houses of Parliament (6 minutes), Westminster Abbey (6 minutes) and Tate Britain (9 minutes).
- 3.2.6. **Figure 3-2** shows the areas accessible on foot from the site within different walking times. Railway and London Underground accessibility is also shown here

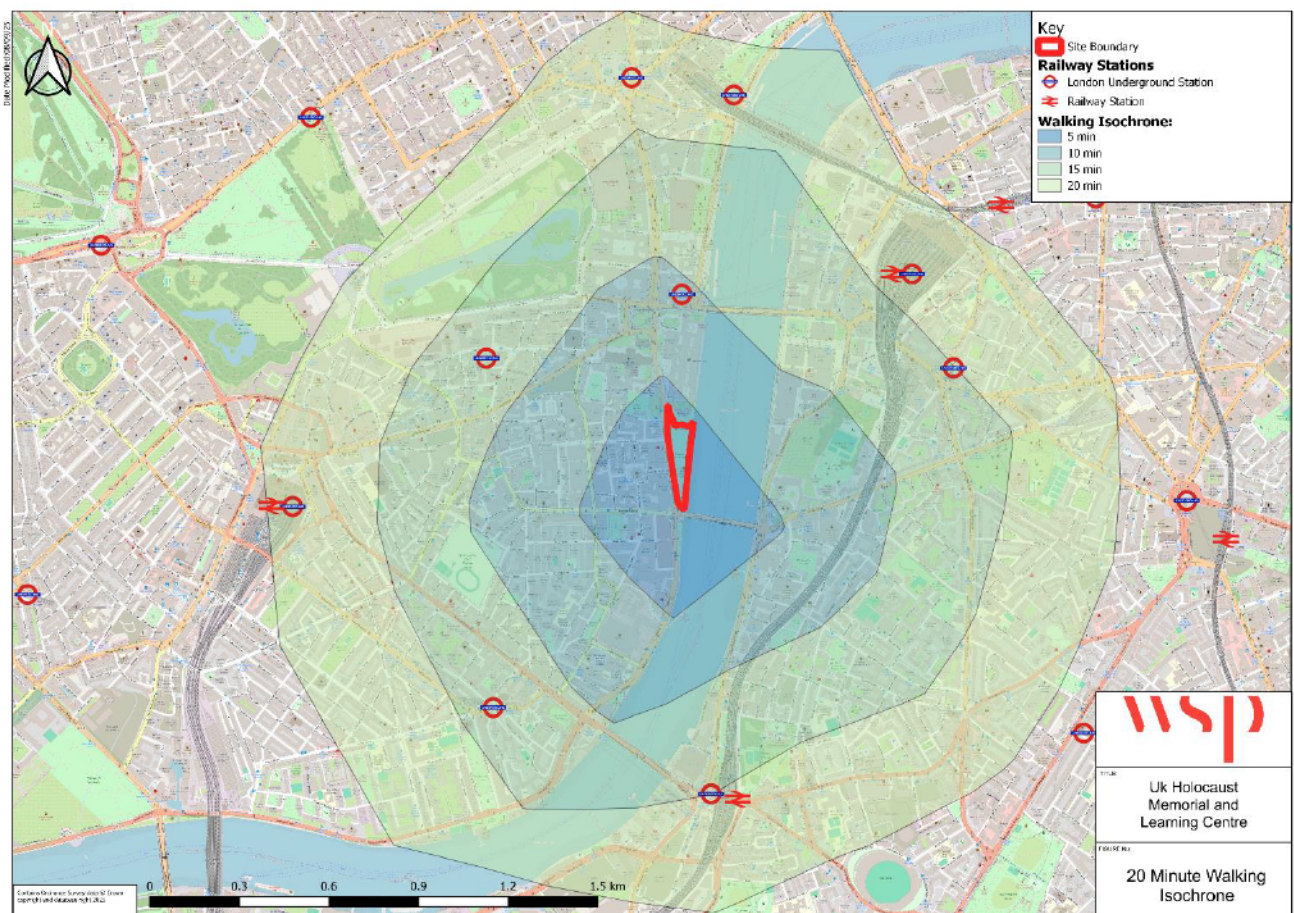


Figure 3-2 - Walking Isochrone

3.3. CYCLE ACCESSIBILITY

- 3.3.1. The site is conveniently located in terms of cycle accessibility with a number of local facilities and amenities. DfT data counts have indicated an increase in the volume of cycling movements along Millbank.
- 3.3.2. Parliament Street and Bridge Street, situated north of the site, form part of the Cycle Superhighway (CS) 3, providing quick and safe access to Tower Hill and east London. To the south of the site, Millbank forms part of CS8 to Wandsworth and CS5 is in close proximity across Vauxhall Bridge providing access to CS7 which runs from The City to Merton.

- 3.3.3. There are also cycles routes signed for use by cyclists within the vicinity of the site, including Lambeth Bridge to the south, providing access to the London Borough of Lambeth.
- 3.3.4. **Figure 3-3** shows the areas accessible by bicycle from the site within different cycling times. The TfL strategic cycle network is also overlayed here to demonstrate the accessible routes.

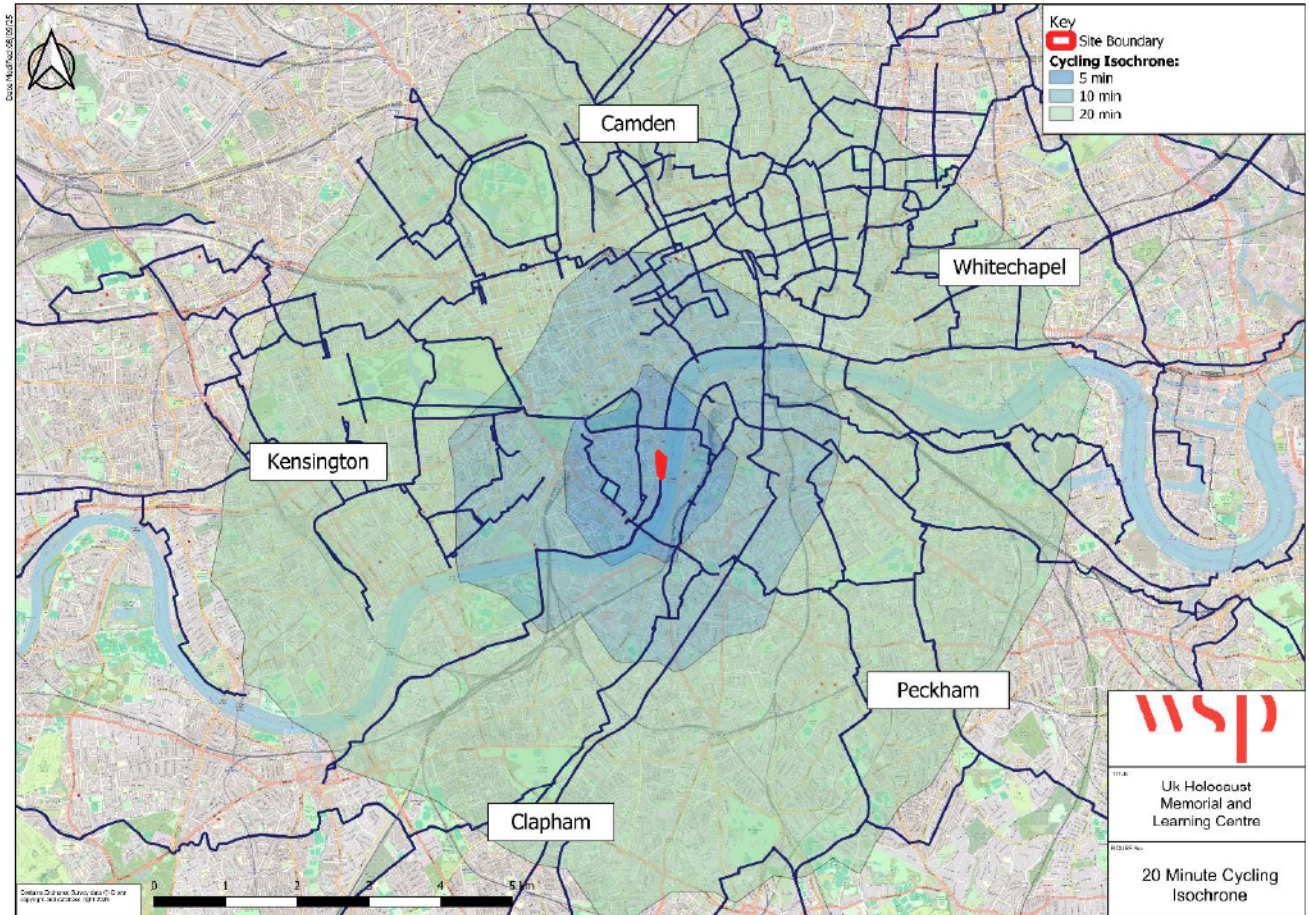


Figure 3-3 - Cycling Isochrone

- 3.3.5. While not being part of any cycleway route itself, Millbank features a dedicated cycle lane throughout sections of the carriageway, linking cycleway 8 to cycleway 3. As of 2025, improvements have been made to the roundabouts at either side of Lambeth Bridge which has improved the connectivity between these routes further. The former Millbank/Horseferry Road/ Lambeth Bridge roundabout has been converted into a signalised junction with pelican crossings and extended cycle lanes on all arms. This greatly improves safety and connectivity for cyclists and pedestrians.

3.4. CYCLE HIRE

- 3.4.1. The nearest Santander Cycle Hire Docking points are located on Abingdon Street (18 docking points), Smith Square (17 docking points), Page Street (22 docking points) and on Horseferry Road (15 docking points). Each of these docking stations are within a five minute walk from the site.
- 3.4.2. WCC has approved the operation of two large scale micromobility schemes in the borough including Lime Bikes & Scooters as well as Forrest Bikes. These schemes ensure that dedicated dockless E-bikes and Scooters parking is available throughout the borough thus improving access to cycling.

4. EXISTING WALKING AND CYCLING CONDITIONS

4.1. INTRODUCTION

4.1.1. This chapter provides a review of the existing public transport conditions within the vicinity of the site, considering changes made since the 2018 application.

4.2. BUS ACCESSIBILITY

4.2.1. There are five bus stops along Millbank and Horseferry Road and where a total of three regular busses and two night busses operate. This includes the 3, N3, C10, 87, N87, and 88. There are also three other busses which operate for tour busses, coaches and busses on diversion. **Figure 4-1** below illustrates the location of the bus and coach stops closest to the site.

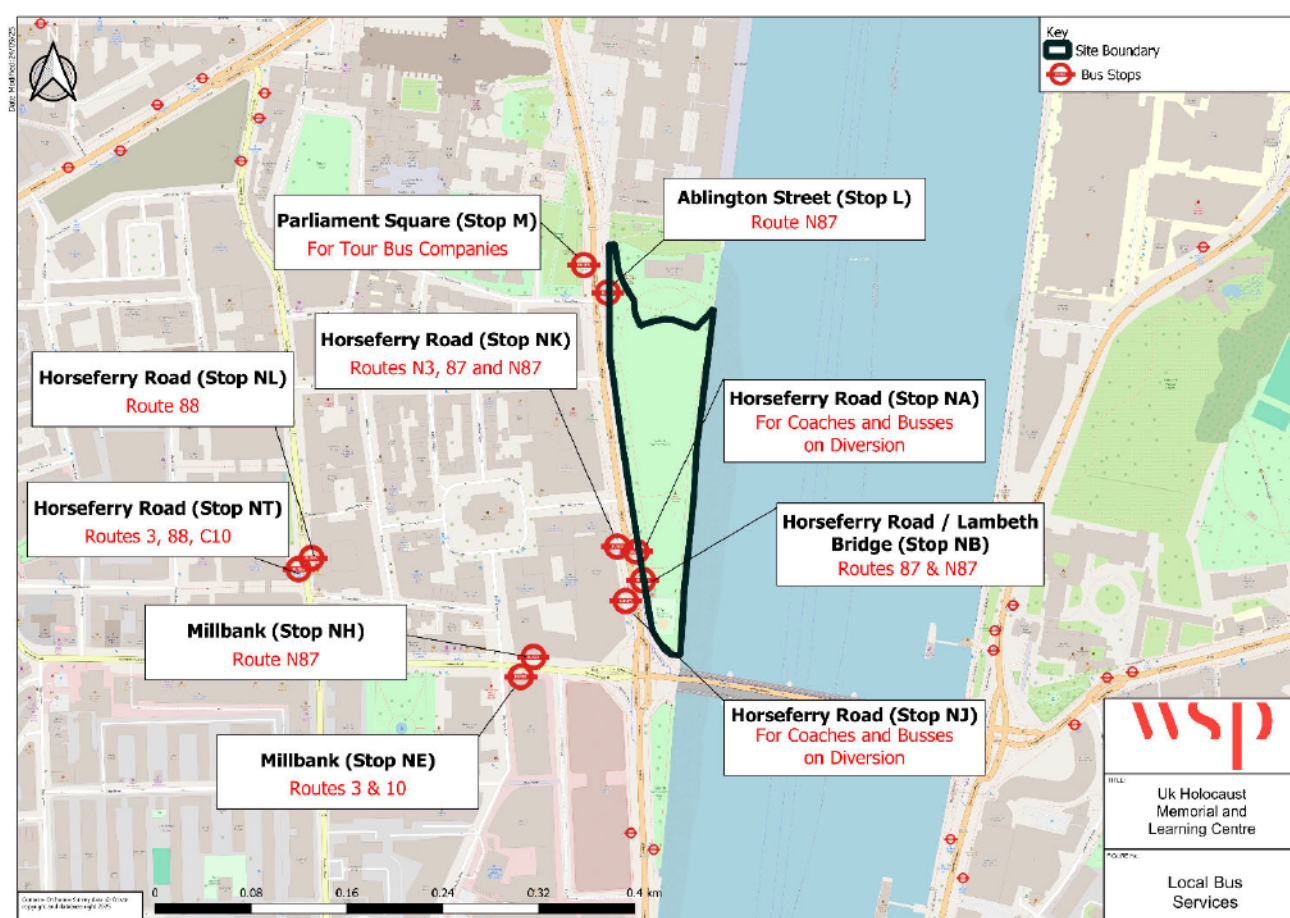


Figure 4-1 - Bus and Coach Stop Locations

4.2.2. **Route 3** runs from Victoria Station terminating in Crystal Palace and the **Route N3** runs a longer route from Oxford Circus Station / Margaret Street to Bromley north Station. **Route 87** starts in Aldwych / Somerset House and terminates in Wandsworth Plain and the **Route N87** runs a longer route from Fairfield Bus Station to Aldwych / Drury Lane. **Route 88** runs from Parliament Hill Fields to Clapham Common via Kentish Town, Regents Park and Vauxhall. **Route C10** is a single-deck bus running from Victoria to Canada water, operating up to eight busses per hours.

- 4.2.3. Two of the stops (NA and NJ) exist for coaches only, though from discussions with TfL coaches it is understood that no scheduled services stop there. The stops can also be used by busses on diversion during nearby road closures for events and during periods of traffic disruption. Additionally, stop Parliament square stop M is in place for tour busses only.
- 4.2.4. Two stops on Marsham Street (NT and NL) are also a short walk from the site and are served by routes 3, 88 and C10. The bus services that stop within close walking distance to the site are summarised in **Table 4-1** below.

Table 4-1 - Bus Frequencies

Route	Destination	Closest Bus Stop	Average hourly frequency (busses per hour)			
			AM Peak (0800-0900)	PM Peak (1700-1800)	Saturday	Sunday
3	Crystal Palace	NT (Marsham St)	7	7	6	6
3	Victoria	NE (Horseferry Rd)	7	7	6	6
87	Wandsworth	NB (Millbank)	8	8	7	5
87	Aldwych	NK (Millbank)	8	8	7	5
88	Clapham	NL (Marsham St)	8	8	7	6
88	Parliament Hill	NT Marsham St)	8	8	7	6
C10	Victoria	NE (Horseferry Rd)	8	8	6	5
C10	Canada Water	NP (Page Street)	8	8	6	5
N87	Kingston	NB (Millbank)	Night Busses			
N87	Aldwych	NK (Millbank)				

- 4.2.5. As shown in **Table 4-1** above, the bus stops on Millbank alongside the site are served an average of 8 busses per hour in each direction, while those on Horseferry Road are served by an average of 15 busses per hour in each direction. This is a decrease in bus traffic when compared to the 2018 Transport Assessment.
- 4.2.6. According to the 2018 Transport Assessment, as many as 19 busses per hour travelled in each direction along Millbank during that period. This is largely due to the rerouting of route 3 to run from Victoria to Crystal Palace, via Great Smith Street, rather than from Trafalgar Square to Crystal Palace. Therefore route 3 no longer runs through Millbank which greatly decreases the total number of busses operating here.

4.3. NATIONAL RAIL AND LONDON UNDERGROUND SERVICES

- 4.3.1. Westminster, St. James's Park and Pimlico Underground stations are all located within a short walk of the site. Westminster Station, situated within a 7 minute walk, provides access to the Circle, District and Jubilee lines. St. James's Park, located 12 minute walk away, also provides access to the Circle and District lines, whilst Pimlico provides access to the Victoria line, located under a 20 minute walking distance away.

4.3.2. **Table 4-2** summarises the frequencies of Underground services from Westminster, the closest station to the proposed UKHMLC and the most likely to be used by visitors given the popularity of the walking route past Parliament.

Table 4-2 - Underground Frequencies from Westminster

Line	Direction	Average number of trains per hour				
		Weekday AM Peak	Weekday Daytime	Weekday PM Peak	Saturday Daytime	Sunday Daytime
Circle & District	Westbound towards St James's Park	26	24	26	24	24
Circle & District	Eastbound towards Embankment	26	24	27	24	24
Jubilee	Northbound towards Green Park	30	24	30	24	24
Jubilee	Southbound towards Waterloo	30	25	30	24	24

4.3.3. As shown in **Table 4-2** above, Westminster station is served by up to 113 trains per hour on weekdays and 96 trains per hour on weekends.

4.3.4. Charing Cross and Victoria stations are located close to the site, both under 20 minutes' walking distance. Charing Cross is serviced by Southeastern, while Victoria is serviced by Southern, Southeastern and Gatwick Express, together providing access to a wide range of locations locally and regionally. Both of these stations are equipped with accessibility, wayfinding and toilet facilities.

4.4. RIVER BOAT SERVICES

4.4.1. Millbank Millennium Pier to the south of the site and Westminster Pier north of the site are the closest piers, both within 10 minute walking distance. They are serviced by the RB1 and RB1X ferries from Battersea Power Station Pier to Greenwich Pier, and the RB2 from Battersea Power Station to London Bridge Pier and the RB6 from Putney Pier to Embankment Pier. A map of these services is displayed in **Figure 4-2**.



Figure 4-2 – Thames Clipper Route Map

4.5. PUBLIC TRANSPORT ACCESSIBILITY LEVEL (PTAL)

- 4.5.1. This site is positioned within a highly accessible area of Central London, with close proximity to bus, London Underground (LUL), Mainline Rail and River Boat services.
- 4.5.2. The high level of public transport provision in the vicinity is recognised by the TfL PTAL map of Westminster, indicating that the site has an “excellent” level of access to public transport rated at PTAL 6a.

4.6. TIM MAPPING

- 4.6.1. The range and frequency of public transport services and existing connectivity is reflected in the TfL online TIM mapping calculator as shown in **Figure 4-3**. This shows the area accessible by public transport from the site within different travel times including waiting time.

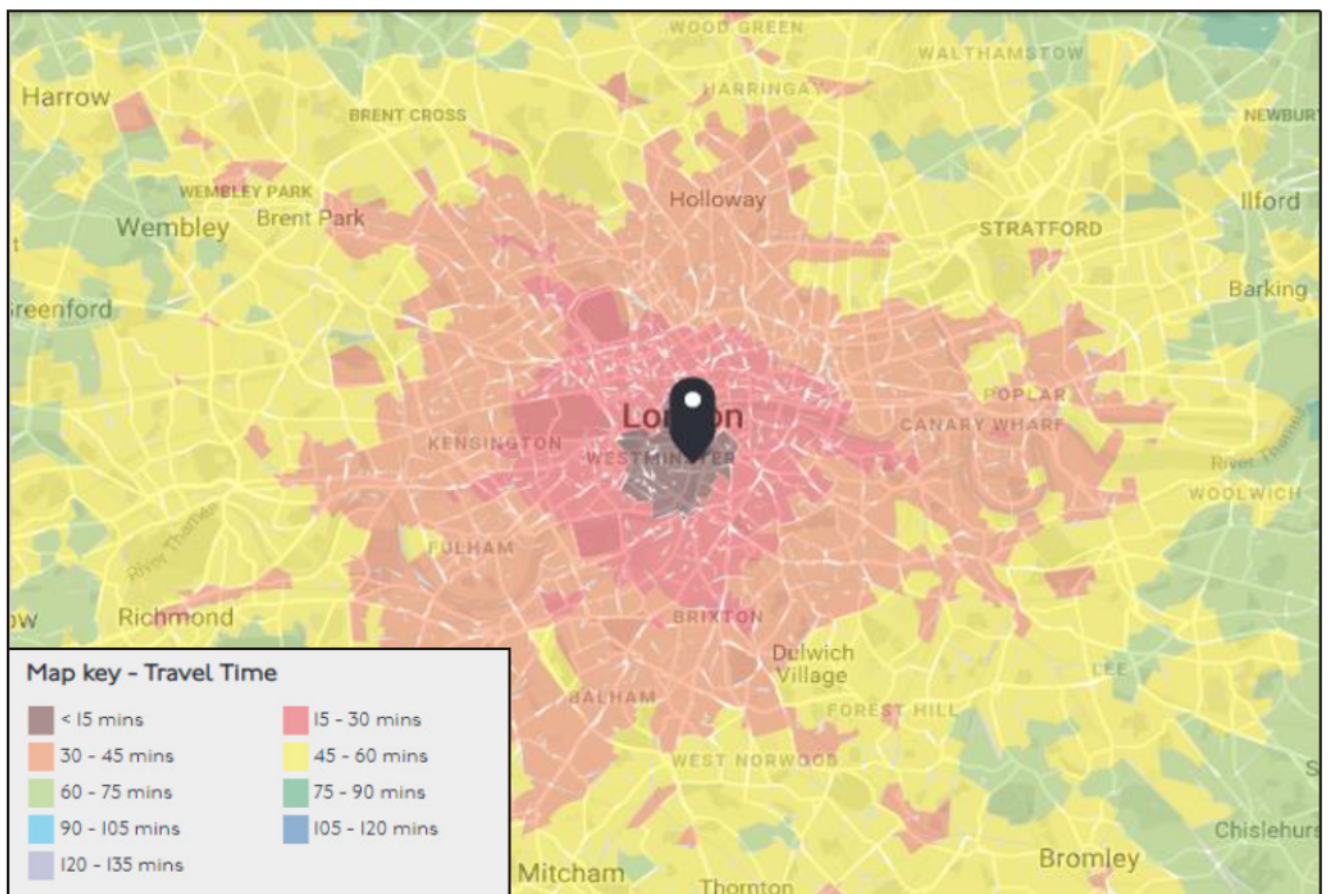


Figure 4-2 - TIM Mapping

- 4.6.2. **Figure 4-3** shows that all of central London can be reached from the site within thirty minutes' total travel time by public transport.

5. EXISTING HIGHWAY NETWORK CONDITIONS

5.1. INTRODUCTION

- 5.1.1. This chapter provides a description of the existing highway conditions in the vicinity of the site, including a description of the local road network and a review of personal injury accident records. It's worth noting that local highway conditions are largely the same as the 2018 application, with the minor changes highlighted.

5.2. HIGHWAY NETWORK

- 5.2.1. The site is located on the eastern side of A3212 Millbank, which forms part of the Strategic Road Network (SRN) in London, and is operated by WCC. The A3212 Millbank now has a 20 mph speed limit. The A3212 Abingdon Street to the north of the site connects with Parliament Square at its northern end via a signalised gyratory. To the south of the site, Millbank forms the northern arm of a roundabout with the A3203 Lambeth Bridge (TfL Red Route) and the B323 Horseferry Road.
- 5.2.2. Millbank is a single carriageway road with a general vehicular lane in both directions and a bus lane in the southbound direction, directly adjacent to the site. There are footways on both sides of the carriageway, there is street lighting, there are double yellow line parking restrictions on both sides of the carriageway and there is a 20mph speed restriction.
- 5.2.3. Parliament Square provides links north to the city via the A3212 Whitehall, east across the A302 Westminster Bridge towards Waterloo Station and Southwark (via Bridge Street), west along Birdcage Walk to Buckingham Palace and southwest along the A302 Victoria Street to Victoria.
- 5.2.4. Lambeth Bridge lies south of the site and crosses the River Thames, connecting the site to London Borough of Lambeth. It is a single carriageway road with a bus lane on the eastbound carriageway and an on-carriageway cycle lane in the westbound direction.

Lambeth Bridge – TfL Safety Improvement Scheme

- 5.2.5. The TfL Lambeth Bridge scheme was originally proposed prior to submission of the 2018 Transport Assessment. Following a long delay and lack of committed funding from TfL the works have now commenced. Phase 1 of the works were undertaken in 2024 with Phase 2 now on site and set to complete in December 2025. The works are described by TfL as follows:

This scheme will improve safety on the bridge and at both the northern and southern junctions. Replacing the roundabouts with signal-controlled junctions means that we can:

- *Add new, safer signal-controlled pedestrian crossings, replacing zebra crossings on the Westminster side of the bridge*
- *Protect and provide time for cyclists to safely connect to existing cycle routes, such as Cycleway 8 on Millbank*

- 5.2.6. The changes include the following:

- *Horseferry Road - straight ahead only for traffic exiting Horseferry Road onto Lambeth Bridge except cyclists who are permitted to turn left*
- *No left turn from Millbank South to Horseferry Road*
- *No right turn from Millbank North to Horseferry Road*

- *No left turn from Lambeth Palace Road to Lambeth Road*
- *No right turn from Lambeth Road to Lambeth Palace Road*

5.2.7. The consequence of these proposed changes will be to reduce traffic movements on Millbank and likely provide a better environment for pedestrians and cyclists on Millbank. The change also resulted in some changes to bus services which are reflected in the bus services illustrated in Table 4-1.

HEALTHY STREETS

5.2.8. A 'Healthy Streets Check for Designers' audit was undertaken for the 2018 TA at the application site's interface with Millbank to demonstrate the effects of the Development Proposals as compared with baseline conditions. WSP has reviewed the 2018 Healthy Streets Designers audit and has concluded that the changes proposed in the application will result in little or no change to the outcomes or scoring as the baseline conditions have not really changed except for in the case of the Lambeth Bridge Works which are not yet fully implemented and the impacts on traffic movements and movements by cyclists as a result of the scheme are not yet available in the DfT surveys. The Healthy Streets audit is presented in section 9.8 of this report

5.3. ACCIDENT HISTORY

- 5.3.1. A review of road traffic accident data in the vicinity of the site has been undertaken for the period June 2021 to June 2024, the most recent three-year period for which data is available. This data is presented in relation to the site in **Figure 5-1**.
- 5.3.2. On the stretch of Abingdon Street and Millbank which runs alongside Victoria Tower Gardens, a total of 8 accidents have occurred during the study period, none of which were fatal, two were serious and the remaining nine were slight.
- 5.3.3. The aforementioned Millbank/Horseferry Road/ Lambeth Bridge roundabout was still in place as of the time of these accidents. During this period, 22 accidents occurred at this roundabout, all of which were slight. As of 2025 this junction is now signalised with better pedestrian and cycle infrastructure in place to reduce the risk of collisions at this junction going forward.

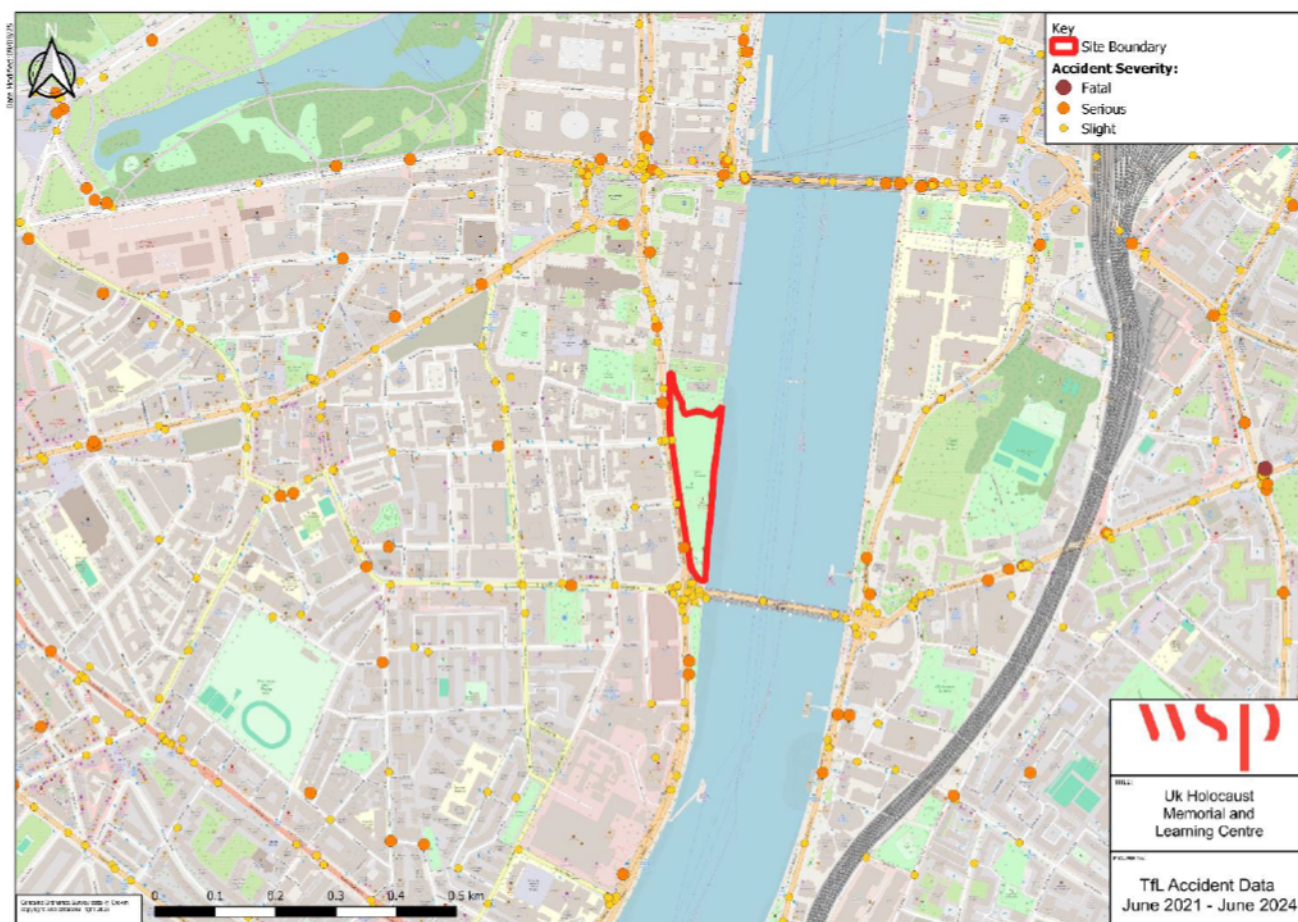


Figure 5-1 - TfL Accident Data

5.4. ON-STREET PARKING AND LOADING RESTRICTIONS

- 5.4.1. The site is located within Controlled Parking Zone (CPZ) D4, which is restricted to residents only from Monday to Friday between the hours of 08:30 and 18:30.
- 5.4.2. The national Blue Badge Parking scheme is not subject to the same regulations in Westminster¹. Residents and other eligible applicants can obtain a White Badge which grants greater parking rights.
- 5.4.3. For Blue Badge Holders (from outside Westminster), parking charges are generally waived for bays which would otherwise be paid for; however blue badge holders cannot park on double yellow lines or on single yellow lines during controlled hours.

¹ <https://www.westminster.gov.uk/where-you-can-park-disabled-badge>

COACH PARKING

- 5.4.4. There are no changes to the Coach Parking arrangements or number of coach trips to the site. The final coach parking strategy is to be a condition of planning and will be submitted for approval prior to operation of the proposed site activities.
- 5.4.5. Within WCC, any motor vehicle containing 8 or more seats (exclusive of the driver) can park within a coach bay. Coach parking bays operate between 08:30am and Midnight and are free after 18:30 on weekdays. There are currently 68 coach parking bays in Westminster, including 5 bays along the section of Millbank south of Lambeth Bridge.
- 5.4.6. In the neighbouring Borough of Lambeth, additional coach parking is available. Albert Embankment, located south of the river across Lambeth Bridge, provides a further nine coach parking bays operation between 10:00-16:00 and 20:00-07:00.
- 5.4.7. The kerbside survey undertaken by Atkins in 2018, noted in relation to coaches that at present 4% of the kerbside space within the study area is allocated to coaches. The average stopping duration for coaches was found to be 20 minutes.
- 5.4.8. During the PM peak, northbound bus stop NK on Horseferry Road is also used by scheduled commuter coaches travelling towards Kent. The Atkins study counted 38 coaches in a single hour (16:00-17:00) on one survey day.

SERVICING

- 5.4.9. The roads around the proposed Development Site are subject to a range of parking and waiting restrictions. **Figure 5-1** below summarises the nearby kerbside allocation of space.

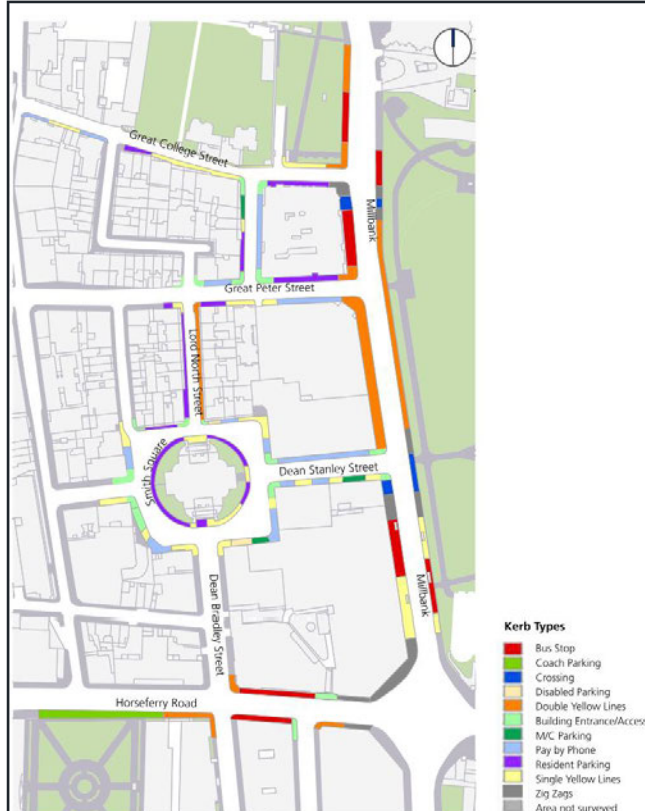


Figure 5-2 - Kerbside Allocations (from Atkins Vehicular and Pedestrian Movement Study, October 2017)

5.4.10. It's worth noting that a small number of alterations have been observed in 2025 since these kerbside allocations were examined in October 2017. These includes the following:

- Removal of 4 residents parking spaces and replaced by an extended footway as well as Scooter and Cycle Hire spaces;
- The removal of four coach parking spaces on Horseferry Road, which has been replaced by a section of resident permit parking spaces;
- Due to construction works on an adjacent building, eight pay by phone car parking spaces, as well as the entire footway on the northern kerb, has since been blocked. This section of road will continue to be blocked until a later stage of construction;
- The removal of a bus stop on the western side of the carriageway, between Gates 1 and 2. Now on this short section of road, a single lane per direction is separated by a large metal gate; and
- The introduction of cycle lanes on both sides of the road along various sections of Millbank. The cycle lanes are present along northbound sections of road, where there are no bus stops and bus lanes. As part of the Lambeth Bridge Roundabout works, segregated cycle lanes can be found on both sides of the road at the southern end of Millbank.

6. PARKING AND SERVICING SURVEY

6.1. INTRODUCTION

- 6.1.1. Servicing activities comprise any loading, unloading and waiting events by LGVs and OGVs. Parked servicing vehicles will be treated separately. This section looks particularly at servicing activity taking place in Zones E and H on Millbank, and sections of the adjacent side roads, including Dean Stanley Street, Great Peter Street and College Street.
- 6.1.2. In 2018, as part of the feasibility stage of the scheme, Atkins was commissioned to undertake a Transport Movement study. This comprised pedestrian and vehicular movement assessments used to inform the development of shortlisted sites. This has included:
- Vehicular and cycle flows on Millbank;
 - Parking and loading study on Millbank and surrounding streets; and
- Pedestrian flows along Millbank and accessing the Gardens.
- 6.1.3. The kerbside study undertaken by Atkins found that servicing represents 13% of all vehicle arrivals in the vicinity of the Site, yet has no designated space
- 6.1.4. At the time, 68% of servicing activities in the area were carried out before 13:00 on weekdays. The majority of these vehicles undertake the loading/unloading of goods (as opposed to maintenance and waste collection, which represent a minority of servicing vehicles) using the kerbside space on the roads near the site.
- 6.1.5. Currently vehicles servicing the Site itself principally utilise the two diversion route bus stops, namely Horseferry Road (Stop NA) and Horseferry Road (Stop NJ), which are on single yellow lines and serve as on-street servicing facilities. Whilst these stops exist, the Atkins survey found that:
- “... servicing occurs almost everywhere in the study area, including bus stops, zig zags, entrances and disabled parking”*
- 6.1.6. The servicing requirements of the Site itself are relatively low, likely to comprise maintenance (groundskeeping and waste collection) of Victoria Tower Gardens, plus deliveries and waste collection associated with the small café. Consequently, the servicing requirements of the existing site represent only a small proportion of the total activity observed during the Atkins survey.
- 6.1.7. The surveys were undertaken during a four-day period from Saturday 30th September to Tuesday 3rd October 2017 as part of the original application submission. **Figure 6-1** shows the relevant scope of the survey study area and illustrates the zones (e.g. Zone B) and sub-zones (e.g. Zone B1) created for analysis.
- 6.1.8. There has however, been some minor alterations of the kerbside arrangement since the date of these surveys as detailed in the previous section. Despite this it is clear that the results of the parking and servicing survey remain accurate.



Figure 6-1 - Parking and Servicing Survey Plan

6.2. KERBSIDE ANALYSIS

MILLBANK EASTERN KERBSIDE

- 6.2.1. From north to south, the eastern kerbside of Millbank comprises an area of approximately 23m of single yellow line, a 23m bus cage, followed by 24m single yellow line, labelled as zones H6, H7 and H8, respectively. Zone H6 is within the bus lane and is restricted to busses only between 07:00-19:00, H7 can accommodate two TfL busses and H8 can accommodate a maximum of one coach.
- 6.2.2. The survey showed that there are some instances when H6 is occupied by stationary vehicles other than busses on a weekday, even though it is within the bus lane with a bus only restriction between 07:00 and 19:00. These instances usually lasted less than 1 minute and will be considered as ad hoc drop off, pick up or waiting times. However, on one occasion an LGV parked in zone H6 for 1hr 19 minutes during the AM peak. Whilst this may be seen to cause disruption to TfL bus services, it is not considered to be a typical event.
- 6.2.3. Servicing in H6, H8 and H9 is typically done overnight, between 23:00 and 08:30, and lasts approximately 2 minutes. There is no significant coach activity on the eastern kerb.

MILLBANK WESTERN KERBSIDE

- 6.2.4. From north to south, the western kerbside comprised a 25m bus cage followed by 45m of single yellow line, labelled H2 and H3. Zone H2 could accommodate a maximum of two TfL busses at once and H3 can accommodate a maximum of three coaches at once.
- 6.2.5. Note that these figures may be slightly altered now, due to the under construction signalised junction on the northern end of Lambeth bridge, which has introduced cycle lanes further up Millbank.
- 6.2.6. The survey showed that the western kerb was frequently used for coach pick up, drop off and waiting activities on weekdays, particularly between 14:00 and 18:30. Zone H3 was commonly used by private coaches on weekdays. The average dwell time ranges from less than a minute to 45 minutes, with most coaches remaining for 15 minutes. **Figure 6-2** shows the occupation H3 between busiest time period on the busiest weekday.

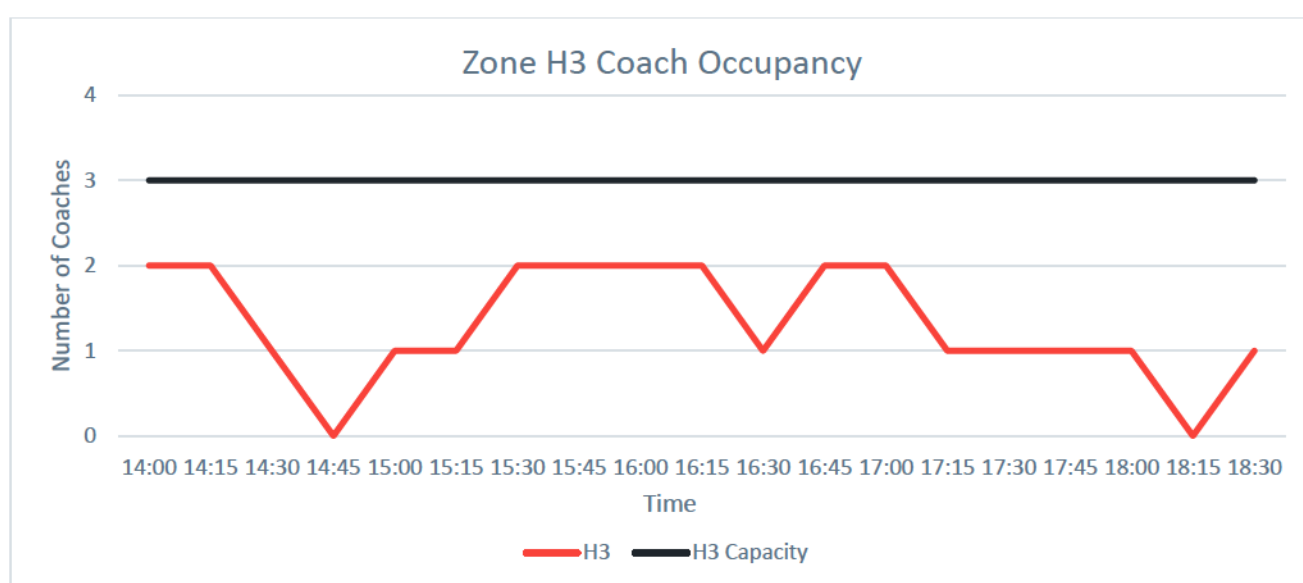


Figure 6-2 - Busiest Weekday Period for Western Kerb Occupancy by Coaches

- 6.2.7. Taking the example of Monday, recorded as being the busiest day surveyed, 23 coach-related events are recorded in H3, all occurring between 14:10 and 18:30. For most of this time only one coach was parked at a time, with the event of two adjacent stationary coaches occurring three times for 17 minutes, 20 minutes and 1 minute, respectively. There were no coach parking occasions within this area on Tuesday, and average pick up and drop off time was 3 minutes.
- 6.2.8. Coach activity on the weekend days was minimal, with only 2 coaches frequenting the eastern kerb for pick up and drop off per day. The survey shows that these servicing activities only occurred between 19:00 and 07:00.

DEAN STANLEY STREET

- 6.2.9. At the time of the Atkins surveys, Dean Stanley Street provided mixed-use parking and waiting opportunities, including pay by phone (zones G1, G2 and G4), motorcycle parking (G6) and single yellow lines (G5 and G7). Zone G1 on the northern kerb is approximately 48m long and had capacity for 6 LGVs.

- 6.2.10. The southern kerb, zones G2-G6, is of equal distance and can accommodate the same number of vehicles. The survey indicated that servicing activity here occurs throughout the day on all surveyed days, with twice as many servicing occasions taking place on weekdays than on weekend days. The southern kerb has been completely unaltered since the time of these surveys
- 6.2.11. Currently, this road operates as a one-way street from Millbank to Smith Square. The car parking and footway on the northern kerb of the road is blocked by hoarding due to construction at the former Westminster House Site. Therefore, this route currently contains motorcycle parking space and 7 pay by phone spaces.
- 6.2.12. On the southern kerb, average servicing time was lower, at 26 minutes. This was due to the addition of single yellow lines with the restriction of 20 minute loading/unloading time for LGVs. As such, vehicle turn over in this section is also high, especially along the double yellow lines, and the pay for parking spaces (G2 and G4) are close to full capacity throughout the day (90-100% occupancy rate).

6.3. PEDESTRIAN MOVEMENT

- 6.3.1. WSP originally collected pedestrian flow data on a bank holiday weekend in May 2017 (Saturday and Monday Bank Holiday), and a Wednesday in September 2017. This data was collected along the footways of Millbank (19 locations), on the crossings leading to the park (seven locations) and at park access points (5 locations). This technical note evaluates whether the 2017 data and modelling remain relevant or whether updates are required to reflect current pedestrian movement patterns observed in 2025.
- 6.3.2. Atkins Realis collected new data on Wednesday 21st May 2025, Saturday 24th May 2025 and Monday 26th May 2025 (Bank Holiday), as provided in Appendix E. Atkins Realis confirmed that the distribution between the 2017 and 2026 data sets was consistent, but some factors impacted the flows at several points (e.g. access onto Lambeth Bridge and demolition of previously occupied buildings). In addition, Atkins Realis added further survey points.
- 6.3.3. Given that the Development Proposals remains unchanged in terms of visitor numbers and transport, data between the 2017 and 2025 surveys will be compared here to outline the trends in pedestrian activity over time since the 2018 Transport Assessment.

PEDESTRIAN FLOW

- 6.3.4. The May 2017 and 2025 survey data has been analysed to compare the pedestrian footfall along different sections of the eastern pavement of Abingdon Street and Millbank:
 - Alongside Old Palace Yard, at the southwest corner of the Houses of Parliament;
 - Immediately north of Gate 1 of Victoria Tower Gardens;
 - Immediately south of Gate 1 of Victoria Tower Gardens.
- 6.3.5. Upon review of the datasets and a comparison between the years 2017 and 2025, several changes and trends have become apparent. It is consistent across the days assessed that the average pedestrian flows between all of the entire surveyed areas have dropped from 2017 to 2025. The percentage reduction is most prominent on a Wednesday, due to the changing travel patterns post the COVID-19 pandemic.
- 6.3.6. It's also worth noting that during the 2025 survey period, the northern footway of Lambeth Bridge was closed to pedestrians and a demolished building on Dean Stanley Street has contributed to a significant decrease in footfall.

6.3.7. **Figure 6-3, Figure 6-4 and Figure 6-5** show the rolling one-hour total pedestrian flows along Millbank on a Wednesday, weekend and bank holiday, displaying survey Results from both 2017 and 2025, respectively.

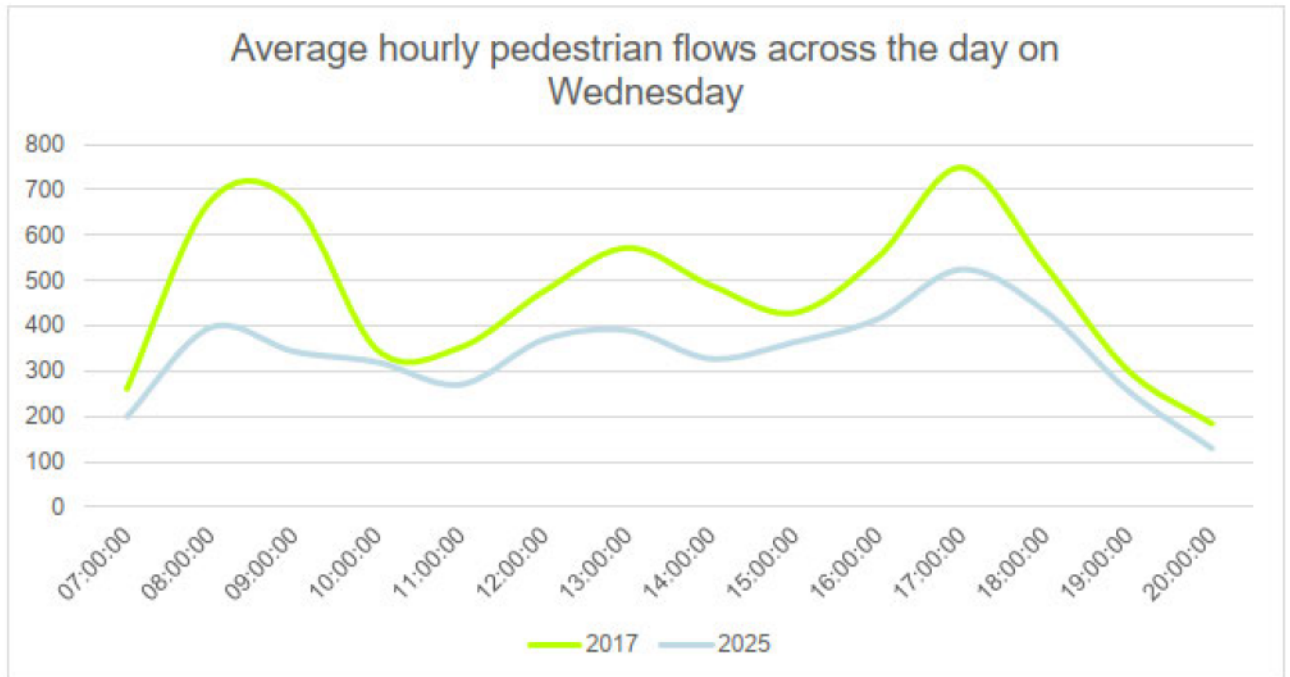


Figure 6-3 - Weekday rolling one-hour two-way footfall along Millbank

6.3.8. The above table demonstrates a drop in pedestrian footfall across the surveyed sites of 28%. Average footfall in 2025 is 4700, compared to 6,600 in 2017. In terms of people per hour, the 2017 survey averaged 470pph, while the 2025 survey averaged 340pph; a 23% decrease in flows. Three distinct peaks can be observed at 08:00, 13:00 and 17:00, however this is less accentuated in the 2025 surveys.

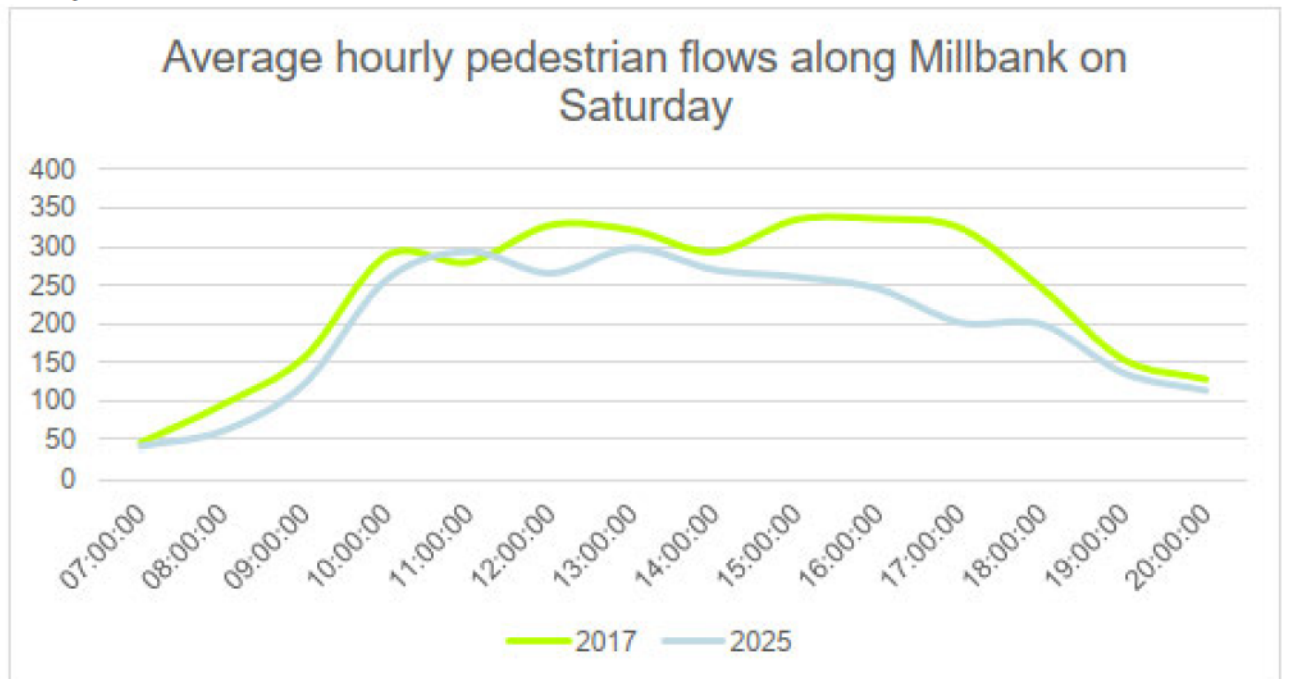


Figure 6-4 - Saturday rolling one-hour two-way footfall along Millbank

- 6.3.9. On a weekend day, a 17% decline in average pedestrian footfall can be seen in the 2025 survey, averaging 2760 (200pph) compared to 3330(240pph) in 2017. In the 2025 data the busiest period was between 11:00 and 13:00, which peaks at just under 300pph.

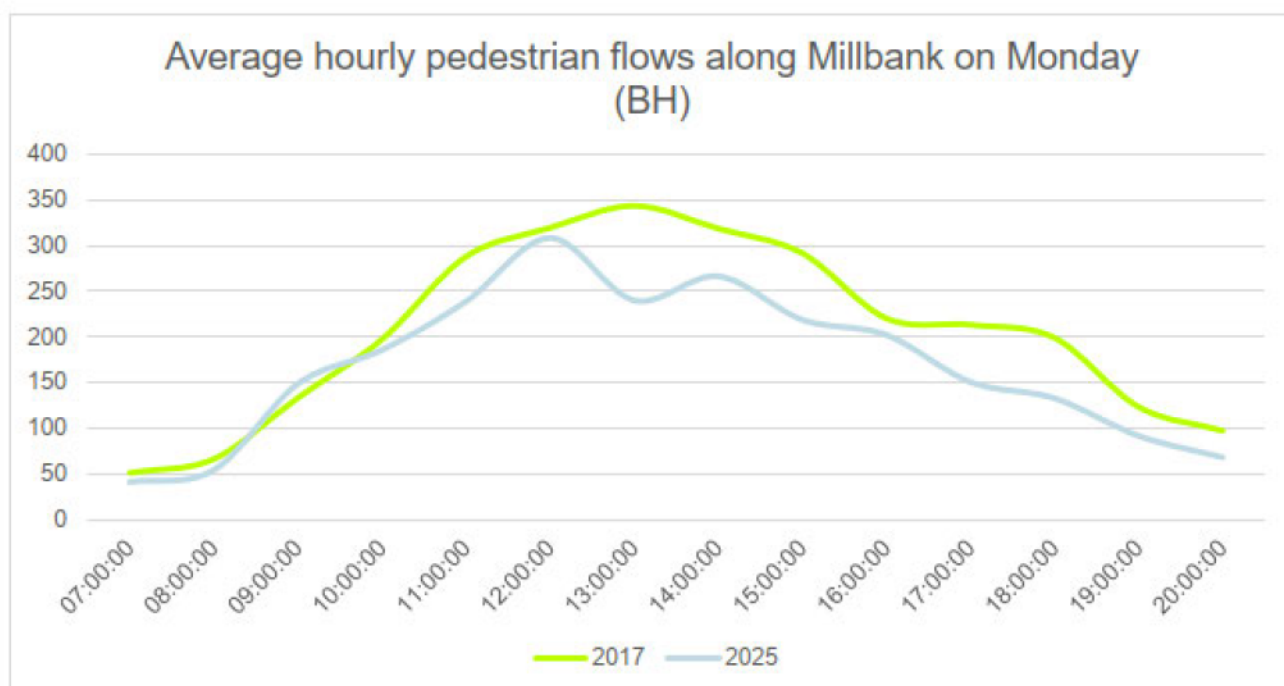


Figure 6-5 - Bank Holiday rolling one-hour two-way footfall along Millbank

- 6.3.10. The average pedestrian footfall across all sites on a bank holiday Monday was approximately 3100 in 2017, 23% higher than the average footfall of 2400 seen in 2025. During both periods, footfall peaked between 11:00 to 15:00, with 2025 peaking at around 310pph and 2017 around 340pph.
- 6.3.11. Overall, the greatest hourly pedestrian flows along Millbank throughout the 2025 study period were seen on a Wednesday at 17:00 to 18:00, peaking at 525pph. This remains 30% less than the 2017 survey peak of 750 at the same period.

PARK ENTRANCES

- 6.3.12. There are five gates providing entry and egress to Victoria Tower Gardens, each gate was analysed in the 2017 and 2024 surveys. **Figure 6-1** shows the location of the park entrances and their respective IDs.
- 6.3.13. Differences in pedestrian flows into each gate can be observed between these surveys. The Average Pedestrian Flows across the park entrances on Wednesday can be observed in **Table 6-1**.

Table 6-1 - Average Pedestrian Flows across Park Entrances on Wednesday (pph)

Park Entrance	2017	2025
Entrance 1 (E1)	441	313
Entrance 2 (E2)	97	95
Entrance 3 (E3)	87	68
Entrance 4 (E4)	66	38
Entrance 5 (E5)	155	110
Average	169	125

- 6.3.14. Pedestrian flow data for each gate averages to around 169 in 2017 and 125 in 2025 – with a total decline of 26%. In 2025, Entrance 1 at the northern end of the park remains by far the most popular at 313 pedestrians per hour going in and out. Entrance 5 is the second most popular, suggesting many pedestrians navigate through the park to and from key destinations to the North and South like Westminster Station and Lambeth Bridge. Distribution between the gates is largely the same in 2025 than in 2017.
- 6.3.15. Both survey years exhibited three distinctive peaks; an AM peak at 08:00, a PM peak around 17:00, and an interpeak at around 12:00, with the PM peak having the highest flows. At the peak hour, pedestrian flows at all entrances reach 295 in 2017, compared to 210 in 2025.
- 6.3.16. When then observing daily flows for all entrances on Wednesday, there is a 30% difference between the 2017 flow count of ~2400, and 2025 pedestrian count of 1700.
- 6.3.17. **Table 6-2** shows the peak hour flows across all park entrances on a Saturday.

Table 6-2 - Average Pedestrian Flows across Park Entrances on a Weekend Day (pph)

Park Entrance	2017	2025
Entrance 1 (E1)	701	345
Entrance 2 (E2)	48	88
Entrance 3 (E3)	65	56
Entrance 4 (E4)	72	38
Entrance 5 (E5)	306	152
Average	238	136

- 6.3.18. As was the case during the weekday, park entrance 1 was the busiest in both years, followed by park entrance 5. The distribution of flows among the gates is largely the same in the weekend with the exception of Entrance 2, where almost double the amount of people use Entrance 2 in 2025 compared to 2017. This may be due to the proximity to Westminster and Parliament Square and the adjacent crossing point.
- 6.3.19. In 2025, 136pph flow through the gates on average, compared to 238pph in 2017 – a 43% reduction. **Table 6-3** shows the peak hour flows across all park entrances on a bank holiday Monday.

Table 6-3 - Average Pedestrian Flows across Park Entrances on Monday (BH) (pph)

Park Entrance	2017	2025
Entrance 1 (E1)	505	307
Entrance 2 (E2)	33	69
Entrance 3 (E3)	64	47
Entrance 4 (E4)	56	35
Entrance 5 (E5)	237	124
Average	179	116

- 6.3.20. In 2017, the average pedestrian footfall across the park entrances was ~2500, whereas in 2025 this figure was ~1630, representing a 35% decrease in flows. It is noted that in 2025, the peak pedestrian flows are higher than the hourly average of 116pph, showing a rise and fall in visits to the park during the midday period. This variation may reflect changes in visitor behaviour and travel patterns typical of Bank Holidays.
- 6.3.21. The distribution of 2025 pedestrian flows is proportionate to those experienced on a weekend day, with Entrance 2 usage almost doubling between 2017 and 2025.
- 6.3.22. It is clear across the 2017 and 2025 surveys that the average pedestrian flows were highest at the weekend in both years, showing a consistent pattern in tourist activity. More specifically, pedestrian entrance to the park peaked at 230 from 15:00 to 16:00.

CROSSING DEMAND

- 6.3.23. There are four formal crossings provided along Millbank adjacent to the site, including the two zebra crossings at the Lambeth Bridge roundabout. There are also four other informal crossings, in the form of dropped kerbs and pedestrian islands, within close proximity to the accesses of the site. **Figure 6-7** shows where the existing crossing opportunities are located.
- 6.3.24. Pedestrian flows for all the crossings on Millbank were surveyed by Atkins in both 2017 and 2025.
- 6.3.25. It should be noted that Formal Crossings 3 and 4 are currently under construction, as part of a scheme to convert the roundabouts to the north and south of Lambeth Bridge to signalised crossings. Construction is set to finish in late 2025.

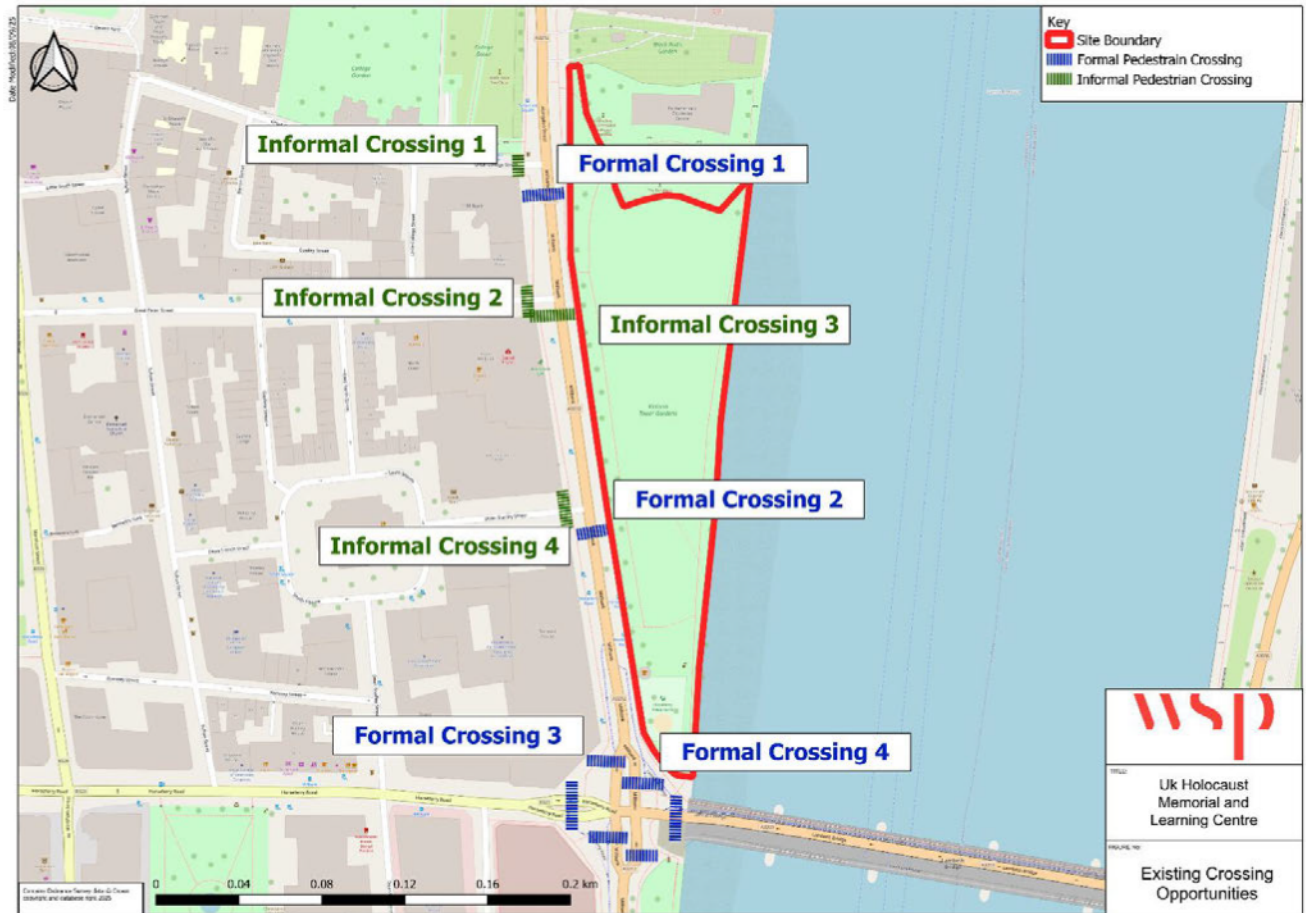


Figure 6-6 - Existing Crossing Opportunities

- 6.3.26. The pedestrian flow assessment indicates that Formal Crossing 1 (zebra crossing with a refuge island) south of Great College Street has the highest all day (07:00 - 21:00) pedestrian flows at 311 on Wednesday, 102 on a Weekend Day and 96 on a Bank Holiday Monday. Additionally, this demonstrates how pedestrian flows are generally higher on a weekday, which the rest of the data reflects.
- 6.3.27. Within the peak hour, the highest number of recorded two-way pedestrian flows can be found at formal crossing 2 (zebra crossing to the south of Dean Stanley St) on a Wednesday (17:00 – 18:00) which reach 459. These are likely commuters who work around Smith Square and commute home via Victoria Tower Gardens or Lambeth Bridge.
- 6.3.28. On a Wednesday at peak hour, all of the examined crossings were recorded at their busiest, which was also the case in the 2017 Atkins Survey. To demonstrate this, a comparison of the 2017 (pictured left) and 2025 surveys (pictured right) are displayed in **Figure 6-7** below.

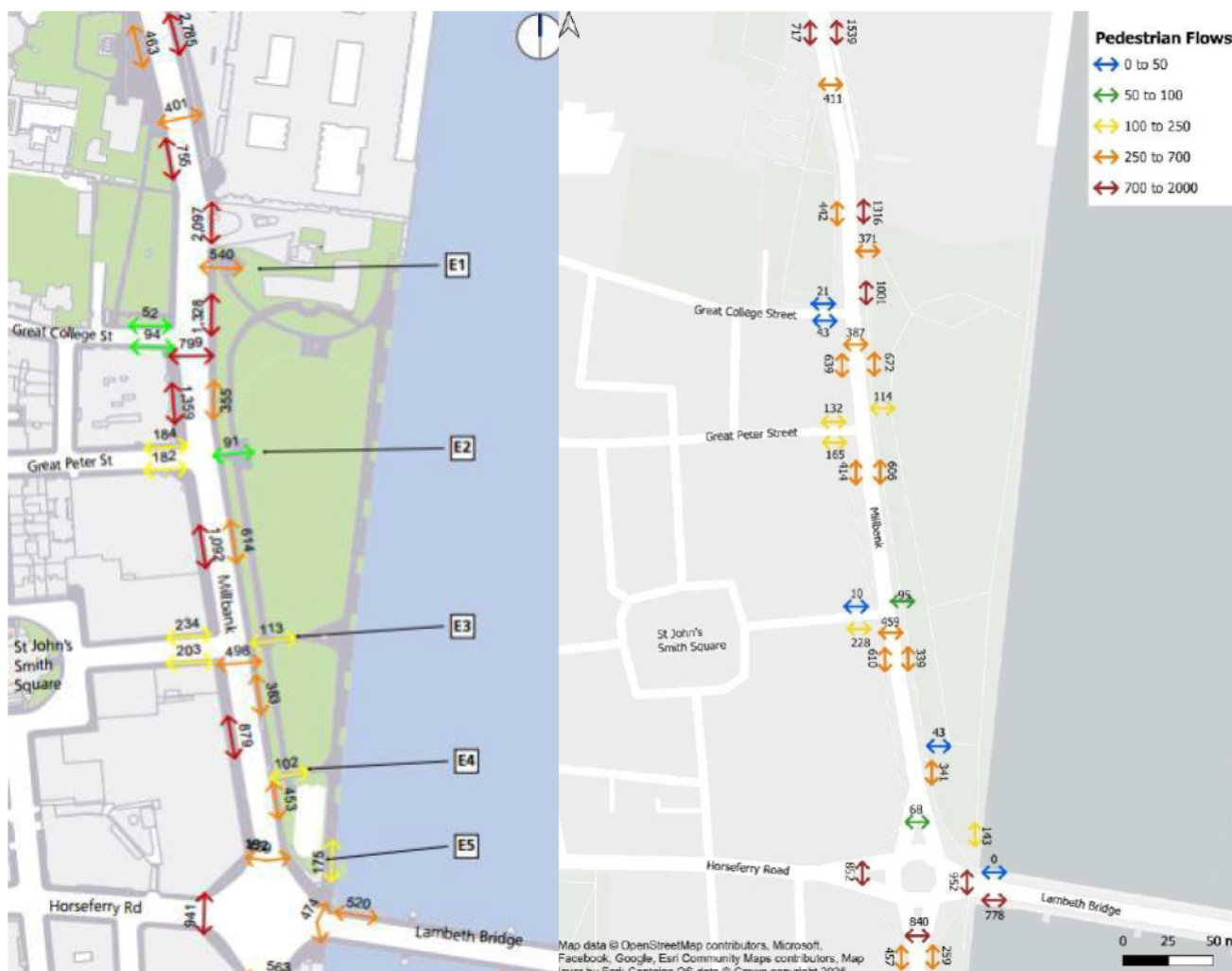


Figure 6-7 - Two-way Pedestrian Flow at Formal Crossing 2

6.4. TRAFFIC FLOW

- 6.4.1. Data from DfT count point 7,603, located on Millbank alongside the site, recorded an Annual Average Daily Flow of 12,800 vehicles per day in 2024 excluding motorcycles and pedal cycles. This shows a steady decline when compared to the 13,500 recorded at the time of the 2018 application.
- 6.4.2. As of 2024, this section of Millbank is used by approximately 7,400 cars, 850 busses and 2,500 light goods vehicles (LGVs) per day, with a smaller number of HGVS (550 per day).
- 6.4.3. The 2024 AADF data demonstrates a significant change to the 2017 Manual Count Survey data presented in the 2018 TA which includes 8,900 cars, 1,000 busses, 3,000 light goods vehicles and under 500 HGVS per day. Upon comparing these figures, it is clear that private car flows have gone down by 17%, which is reflected in a drop in mode share from 42% of trips to 36%. A comparison table of the two datasets is shown in **Table 6-4**.
- 6.4.4. The manual count upon which the DfT data is based recorded almost 6,900 bicycles per day passing along this section of Millbank, and a further 1,000 bicycles has been estimated using Annual Average Daily Flow (AADF) increases over previous years. Upon comparison to the 2017 Manual Count Survey data, it is clear that cyclist mode share has grown from 28% to 38% of all trips.

- 6.4.5. Bus journeys have decreased due to a change in the service specification on Millbank as illustrated in **Table 4-1**.
- 6.4.6. Overall, there is anticipated to be less traffic on Millbank in the future due to the changes proposed by the Lambeth Bridge TfL Safety Improvement Scheme as detailed earlier in this report. The modelling undertaken for the original scheme is considered out of date and WSP has sought further information directly from TfL. However, the modelling tables provided by TfL in 2017 illustrate some additional seconds delay on Millbank due to the installation of traffic signals which should become operation from the end of 2025 / early 2026. These changes have no bearing on the Development Proposals and due to its car free nature the Development Proposals does not change traffic flows on the corridor.

Table 6-4 - Millbank Annual Average Daily Flows

Year	2017 Manual Count Survey			2024 Data estimated using AADF from previous years		
Direction	Two Way	North bound	South bound	Two Way	North bound	South bound
All Traffic	21442	10951	10492	20729	10890	9839
All Traffic (Excluding Cycles and Motorcycles)	15513	7548	7965	12853	6894	5959
Pedal cycles	5929	3403	2527	7876	3996	3880
Two wheeled motor vehicles	2010	1026	984	1606	818	788
Cars and taxis	8932	4387	4545	7372	4121	3252
Busses and coaches	1015	582	433	842	403	439
Light goods vehicles	3059	1329	1729	2487	1276	1211
Heavy goods vehicles	497	224	273	546	277	270

7. DEVELOPMENT PROPOSALS

7.1. INTRODUCTION

- 7.1.1. This chapter outlines the Development Proposals in terms of access arrangements and parking provision for both cycles and coaches. Development proposals in terms of transport design have not been altered significantly since the 2018 Transport Assessment beyond minor design changes to landscape, appearance and fire safety. These changes have not impacted the proposed transport and access and are not considered to result in any change to the transport assessment. However, changes in surrounding transport infrastructure and committed development as well as transport policy has been accounted for in this document.

7.2. ACCESS

- 7.2.1. The design of the Development has been carefully considered in a way which balances the need to retain pedestrian and cycle permeability whilst also controlling access to the site, given the need for safety and security which means that unrestricted access to the UKHMLC is not possible.
- 7.2.2. At present Victoria Tower Gardens are open from dawn until dusk which, during winter, is as early as 4pm. Indicative opening hours for the UKHMLC are 9.30am until 5.30pm. At this stage various options for accessing the UKHMLC are being considered, including the possibility of extending the opening hours of the surrounding park to enable access to the UKHMLC via all of the Garden's gates.
- 7.2.3. Once UKHMLC visitors have entered Victoria Tower Gardens, they will walk to its southern end where the entrance to the interior of the UKHMLC will be located.
- 7.2.4. **Figure 3-1** shows the pedestrian accesses to Victoria Tower Gardens in relation to the surrounding environment.
- 7.2.5. The pedestrian strategy for the site makes use of multiple existing accesses to Victoria Tower Gardens in such a way as to minimise congestion on any single section of footway along Millbank.
- 7.2.6. Pedestrians approaching from Parliament Square – who are anticipated to make up the majority of the visitor numbers – are anticipated to enter the park from Gate 1 at the northern end of Victoria Tower Gardens, since walking through the park gives a view of the Thames and the Houses of Parliament as opposed to walking along Millbank.
- 7.2.7. Coaches will drop off visitors close to the pedestrian access opposite Dean Stanley Street; their passengers will enter via Gates 3 or 4. Visitors approaching from the south (for example those who have come from the Tate), and those crossing Lambeth Bridge, will enter from Gate 5.
- 7.2.8. The pedestrian strategy therefore encourages visitors to use a range of accesses and, in this way, minimises any pedestrian congestion along any single section of the Millbank footway.

7.3. PARKING

CAR PARKING

- 7.3.1. Given the Site's excellent accessibility by public transport, it is proposed that no new car parking be provided for visitors or staff.
- 7.3.2. Whilst the 2021 London Plan does not provide specific standards for memorials, it does recommend that *"all non-residential elements of a development should provide at least one on or off street disabled*

persons parking bay". The nature of the development, combined with the proximity to high-profile locations including Westminster Abbey and the Houses of Parliament, makes it necessary to restrict vehicular access to the site for security reasons. It is therefore proposed that no blue badge parking be provided on site.

- 7.3.3. Westminster City Council indicated that it would not support the provision of additional on-street bays for blue badge holders. Moreover, step-free public transport provision is good: two bus routes operated by low-floor vehicles stop outside the Site, and Westminster station has step-free access. This will reduce the need for mobility impaired people to depend on private cars to be able to visit the UKHMLC. This will be further reinforced by the Holocaust Memorial's website and visitor communications, which will encourage disabled visitors to travel to the site by public transport.
- 7.3.4. It is considered that the demand for parking for blue badge holders visiting the Site can be accommodated by using the existing blue badge parking bays within the vicinity of Victoria Tower Gardens. There are seven blue badge bays within close proximity to the site, including new bays on Horseferry Road; these are operational from Monday to Friday 08:30-18:30 with a maximum stay of 4hrs:
- Three bays on Smith Square, located 100m from gate 3;
 - Three bays on Great Peter Street, located up to 150m from gate 2; and
 - One bay on Dean Bradley Street, located up to 150m from gate 3.
- 7.3.5. Additionally, blue badge holders are permitted to park within paid-for bays in Westminster, where they will be granted an extra hour free after initial payment during controlled hours. The closest Paid-for bays are as follows:
- Dean Stanley Street (located 50m from gate 3 of the site) – seven bays.
 - Little College Street – nine bays.
 - Smith Square – thirteen bays.
 - Great Peter Street – eleven bays.
 - Dean Bradley Street – five bays.
- 7.3.6. Persons working in Westminster are eligible to apply for a White Badge which allows them to park for free at any time in all residents' parking bays. There are also residents' bays on Dean Stanley Street which a disabled employee in possession of a white badge would be able to use.

CYCLE PARKING

- 7.3.7. On-site cycle parking will be provided for staff and visitors in accordance with the WCC UDP and Draft London Plan standards. As there are no specific standards for memorials, the London Plan 'D1 Other' parking standards are to be applied, i.e. one space per eight staff plus one visitor space per 100sqm of floor area.
- 7.3.8. Cycle parking standards for leisure and educational uses have been unaltered since the 2018 application, which utilised cycle parking standards from the draft of the current local plan.
- 7.3.9. With the Learning Centre having a proposed floorspace of 3258sqm (GEA), the parking requirement equates to 33 visitor spaces. It is proposed that these be provided on the western pavement on Millbank opposite the UKHMLC, rather than within Victoria Tower Gardens, for the following reasons:
- Pushing cycles into the garden would increase congestion at the gates;

- There is limited space between the garden railings and the UKHMLC, and the addition of cycle parking would further reduce this space;
- Installation of cycle parking within the railing line could conflict with the trees already present;
- Victoria Tower Gardens is closed overnight. Provision of on-street spaces will mean that they can be used by members of the public outside of the opening hours of the garden and the UKHMLC.

7.3.10. It is proposed to provide the 28 cycle parking spaces in the form of 14 Sheffield stands to be located on the western side of Millbank. There are already several sets of cycle stands along this pavement; it is proposed to extend the row north of Dean Stanley Street by ten stands (14 spaces), and to extend the row north of Horseferry Road roundabout by seven stands (14 spaces). Extending rows of existing cycle stands means that the effective footway width of Millbank will not become narrower.

7.3.11. These locations are close to the pedestrian crossings leading to gates 4 and 5 respectively, meaning that the cycle parking will be located on the desire line between the cycling route of Millbank and the UKHMLC entrance.

7.3.12. A total of 20 staff members will be employed for the scheme. It is proposed to provide 4 covered, secure staff parking spaces, equating to a provision of 1 space to 8 staff members. These will be located close to the loading bay on the western side of the UKHMLC.

TAXI DROP-OFFS / PICK-UPS

7.3.13. An island taxi stand is already present on Millbank in the centre of the carriageway between the Great Peter Street and Dean Stanley Street junctions. The Development Proposals do not affect this stand. Taxis can wait on this stand and, once the UKHMLC is operational, it is likely that the stand will be even better frequented by taxis due to the addition of a trip attractor.

7.3.14. Taxi drop-offs can take place in the southbound bus lane or along the northbound kerbside, and no additional taxi facilities are considered to be required.

7.4. SERVICING

7.4.1. The proposed servicing strategy seeks to reduce the need for on-street servicing whilst also recognising the security requirements commensurate with a Development Proposals of this nature and location. Any vehicle entering the Site increases the security risk as well as potential conflict between pedestrians on Millbank and vehicles crossing the footway.

7.4.2. Westminster City Council's preference is for off-street servicing, and the scheme proposals include a servicing bay within the UKHMLC boundary. This would be accessed through gate 3 outside of the UKHMLC's opening hours and outside of the bus lane's operating hours from 7am to 7pm from Monday to Saturday.

7.4.3. Counter-terrorism engagement has been undertaken by WSP Security with the National Protective Security Authority (NPSA) to coordinate Hostile Vehicle Mitigation measures with other schemes being considered in the adjacent area. This will ensure that scheme style being applied is appropriate for the location. The alignment of measures will be along the perimeter of the gardens in order to most effectively protect people.

7.4.4. The vehicular accesses to the site will therefore need to be controlled by a form of bollard, protecting not just the site itself but also the footways either side (i.e. to prevent a vehicle from using the crossover to enter the protected footway).

- 7.4.5. Due to the trolleying distance requirements, waste will be collected by a private contractor. Refuse from the individual uses within the site (exhibition space, café etc.) will be kept in a single bin store alongside the servicing bay. Refuse vehicles will enter and exit the site in forward gear. Refuse collection will take place outside of the opening hours of the gardens and the UKHMLC.
- 7.4.6. The on-site servicing bay will also be used by deliveries to the UKHMLC: the bay can accommodate a van for typical deliveries. These servicing vehicles would also access the site outside of opening hours and enter and exit in forward gear.
- 7.4.7. It is also proposed to provide a short (7m) on-street servicing bay, which will require the reconfiguration of the highway layout and traffic markings along the eastern side of Millbank. Whilst servicing will take place on-site and outside of the UKHMLC's operating hours wherever possible, some servicing will also need to take place during the working day, for example parcel deliveries which are part of a daytime multi-drop delivery schedule.
- 7.4.8. **Figure 7-1** shows the location of the on-street servicing bay. By providing this bay, quick daytime deliveries can be accommodated during the daytime without creating conflict with pedestrians walking along Millbank or accessing the UKHMLC, since vehicles would not cross the footway.
- 7.4.9. The servicing bay will be located within an existing bus lane which operates between 07:00 and 19:00 Monday to Friday. TfL have indicated that they would not object in principle to other vehicles stopping during the daytime provided that the peak periods of 07:00-10:00 and 16:00-19:00 remain safeguarded.
- 7.4.10. The proposed servicing bay would therefore be operational between 10:00-16:00 and between 19:00-07:00. It would be governed by a 'loading only' restriction. Analysis of existing servicing activity in the vicinity of the UKHMLC has shown that existing demand is already accommodated by existing sections of single yellow line including on the western side of Millbank. It is not considered that provision of a new 7m servicing bay would generate additional servicing activity besides that associated with the UKHMLC, given that the existing kerbside arrangement on the western kerbside of Millbank is more convenient for servicing other nearby buildings.

COACH PARKING AND BUS STOPS

- 7.4.11. It is recognised that existing coach parking in the wider area is under high demand and as such the Detailed Coach Parking Strategy will illustrate how proposed coach parking at the site will operate in the wider area. The site coach parking arrangements are illustrated in Table 7-1.
- 7.4.12. It is proposed to provide a 30m coach drop-off / pickup bay on the eastern kerbside of Millbank, immediately south of the zebra crossing alongside Dean Stanley Street. Currently this section of kerbside is in a bus lane (operating 07:00-19:00 Monday to Friday) with a single yellow line controlling waiting outside of the bus lane's hours of operation.
- 7.4.13. The coach bay will be accommodated by relocating the bus cage for stops NA and NB to the southern end of this section of kerbside; at present this section is marked with a single yellow line and is lightly used. Consideration had been given to consolidating bus stops NA and NB into a single-length cage, given that no scheduled bus routes use stop NA and NB is only served by routes 87 and N87.
- 7.4.14. The relocated TfL bus cage will be 32.5m in length which allows for a rear bus to pull up behind a front bus, and pull out again, while the front bus is still stationary. There will therefore be no negative impact on bus manoeuvring.

- 7.4.15. The new coach bay will be 30m in length, sufficient to accommodate two large coaches simultaneously. The bay would be governed by a 'loading only' restriction in order to prevent parking: coaches would only be permitted to be stationary in the bay for as long as is necessary to unload or load passengers. Working assumptions are that a coach can unload passengers in five minutes and load passengers in a maximum of fifteen minutes.
- 7.4.16. As described in Chapter 6, the PM peak pedestrian flow along the section of Millbank footway where coaches would unload is 383 pedestrians per hour, which is lower than the flows north of Gate 3 or south of Gate 4. The proposed coach bay would therefore allow passengers to board and alight coaches in such a way as to minimise disruption to existing users of the footway.
- 7.4.17. It is recognised that coach parking capacity is a wider issue across the City of Westminster, and the applicant has engaged with WCC and TfL to identify suitable locations where coaches can park whilst passengers are visiting the UKHMLC.
- 7.4.18. Beyond the borders of the borough, additional coach parking is available in nearby locations in Lambeth. Albert Embankment in particular, located south of the river across Lambeth Bridge, provides a further nine coach parking bays operational between 10:00-16:00 and 20:00-07:00. These bays will aid in relieving the parking pressure on WCC streets.
- 7.4.19. From site observations it is evident that a number of commuter coaches wait in the vicinity of Horseferry Road on weekday afternoons prior to departing for Kent (as Millbank stop NK - opposite the UKHMLC - is their first departure stop). The 'loading only' restriction will help to ensure that the bay is used for its intended purpose of serving the UKHMLC rather than as a long-stay parking space for commuter coaches on a daily basis.

HIGHWAY LAYOUT

- 7.4.20. **Figure 7-1** shows the preferred highway layout proposal along Millbank's eastern kerb between Dean Stanley Street and Horseferry Road. No changes are proposed along the western kerb.
- 7.4.21. From north to south, the proposed kerbside allocation is as follows:
 - Coach drop off / pick up bay (30m);
 - Loading bay (7m);
 - Bus cage (32.5m) with a relocated bus shelter.
- 7.4.22. A larger version of the plan is provided as **Appendix A**.

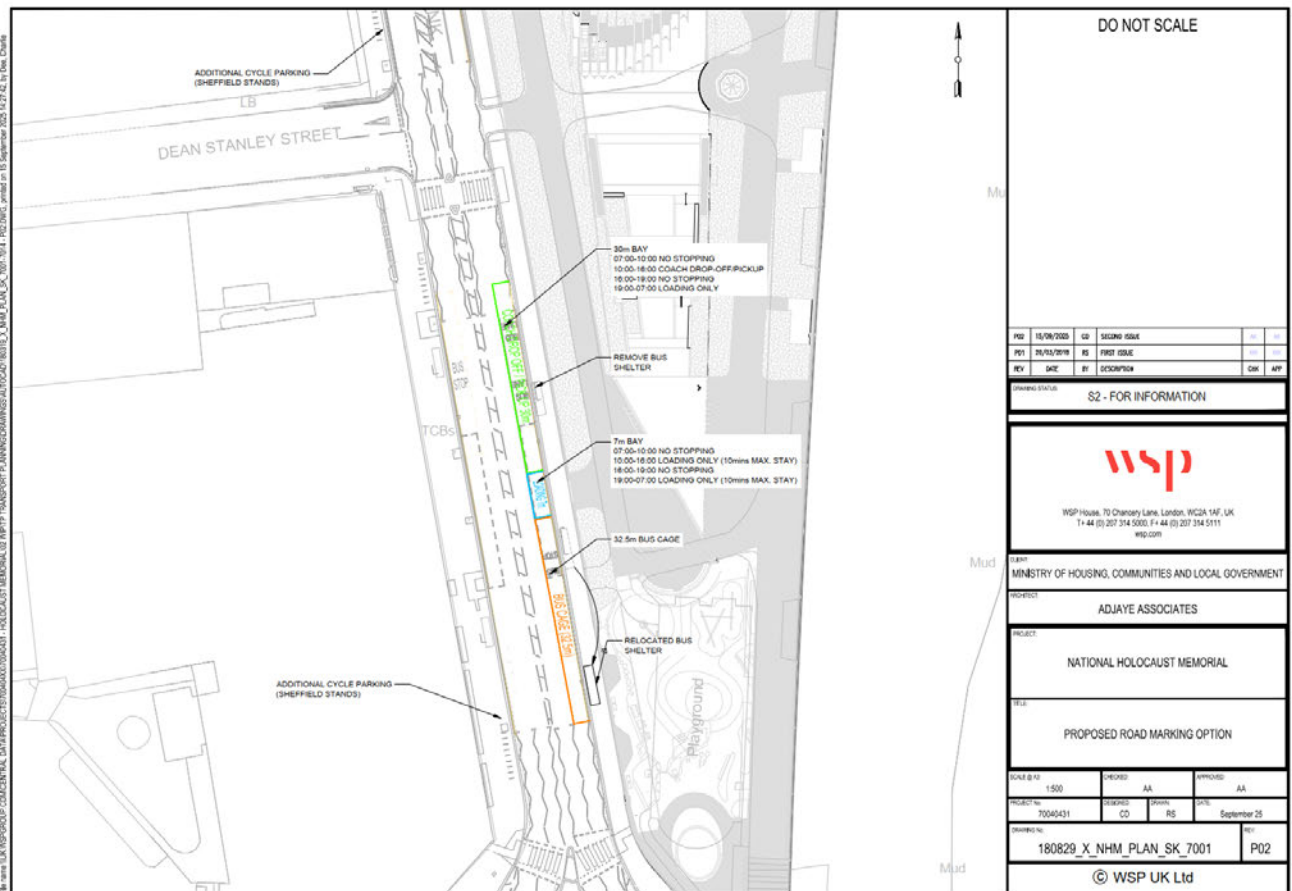


Figure 7-1 - Proposed kerbside allocation (larger version provided as Appendix A)

- 7.4.23. This is the preferred highway layout option as it allows coaches to drop off and pick up alongside Gate 3.
- 7.4.24. Between 10:00 and 16:00 the coach bay would be limited to coaches only, with no other vehicles permitted to load or unload. The coach bay would be governed by the 'loading/unloading' time restriction whereby coaches are only permitted to stop for the length of time required for passengers to board or alight, rather than a 20-minute limit which may encourage idling. This will reduce the likelihood of coaches arriving earlier than their pickup time and also deter other uses of the bay such as commuter coach parking.
- 7.4.25. Between 19:00 and 07:00 the coach bay could be used by other vehicles for servicing: its 30m length will allow occasional HGVs serving the UKHMLC (for example during exhibition changeovers) to unload close to Gate 3, from where goods can be moved into the site.
- 7.4.26. The 7m servicing bay can be used by LGVs for servicing between the hours of 10:00-16:00, as well as overnight. Blue badge holders are also permitted to drop off and pick up in a loading bay, thereby facilitating access to the UKHMLC for those being dropped off in a vehicle which will then proceed to park in a dedicated bay away from the site.

TRAFFIC ORDERS

- 7.4.27. As part of the 2018 Transport Assessment discussions TfL and WCC were supportive of applying a short maximum stay to the proposed bays on Millbank, which would also facilitate drop-offs and pick-ups of visitors to the UKHMLC and reduce the likelihood of the bays being used as parking spaces by coaches (including commuter coaches). A series of traffic orders have been reviewed to find the best suited restrictions to govern the kerbside adjacent to the site.
- 7.4.28. Three potential restrictions from those applicable in the City of Westminster² have been shortlisted, namely:
- Single Yellow Line;
 - Coach Only Pay-to-Park Bay; and
 - On-street Loading Bay.
- 7.4.29. With regards to coaches, the **single yellow line** restriction allows for 10 minutes picking up/setting down, extended for as long as necessary for the process to conclude. Whilst this aspect of the restriction is suitable, it also permits at least 40 minutes for HGVs for loading/unloading activities, which would disrupt the anticipated coach movements. Therefore, this restriction is deemed unsuitable.
- 7.4.30. The restrictions associated with a **coach-only pay-to-park bay** in the City of Westminster include allowing only coaches to park between 08:00 and midnight. It also permits loading activity by private vehicles for 20 minutes before a penalty charge notice (PCN) will be issued. Given that the proposed coach bay on Millbank is intended to be used only by coaches and not by other vehicles to load, a coach-only bay (paid or free) is not considered suitable given that it does not prohibit use by other vehicles for loading.
- 7.4.31. WCC operate 'Loading Only' and 'Goods Vehicle Only' **loading bays** which may or may not include a maximum stay. The two types of bays differ by the categories of vehicle permitted, with both stating, "vehicles may not park in these bays within the hours states on the time-plate (some apply at all times) without engaging in loading/unloading activity". Given that this minimises the chance of long dwell time (for example parking), this restriction is considered to be the most suitable for the bay. It is proposed that a 'Coach Only' restriction with a coach symbol be provided on the plate. Coach parties visiting the UKHMLC would be advised in advance that the bay is solely for use for the length of time required to load or unload passengers. To maximise the availability of bays, it is proposed that a 15 minute maximum stay restriction be applied to the bay.
- 7.4.32. The proposed 7m servicing bay, to be located immediately south of the coach bay, would have a 'Loading Only' restriction (for all vehicle types) and would be useable outside of the hours of operation of the bus lane. This bay is proposed in order to accommodate the small number of deliveries by LGV which may take place during the daytime between 10:00 and 16:00 when vehicles cannot enter the site and the coach bays cannot be used by other vehicle types.

² City of Westminster Parking Services - Kerbside Management & Enforcement Code of Practice – v.4.0 April 2017

FOOTWAY LAYOUT

- 7.4.33. As a result of the installation of hostile vehicle mitigation barriers along the eastern side of Abingdon Street alongside the Houses of Parliament, there is ample protected space for pedestrians to walk along, which will also benefit visitors to the UKHMLC.
- 7.4.34. However, there is a localised pinch point directly outside Gate 1 of the park, where a security booth and second parallel barrier constrain the width of the footway to 2.3m.
- 7.4.35. Discussions will take place with the relevant authorities to determine whether a small modification to the layout of the barrier is possible, such that the obstruction directly outside Gate 1 is removed without any reduction in the level of hostile vehicle mitigation.

8. TRIP GENERATION AND MODAL SPLIT

8.1. INTRODUCTION

- 8.1.1. This chapter sets out the proposed trip generation for the scheme, which is unchanged from the 2018 Transport Assessment. Assumptions about visitor numbers and profiles within this Transport Assessment are based on similar developments in similar contexts and the project business/operational plan. There is no demonstrable need to change these assumptions.
- 8.1.2. As explained in the Ticketing Report, a maximum of 3,300 tickets will be issued per day (410 per hour). Findings from comparable attractions indicate that at least 10% of ticket holders are expected to be 'no-shows'. Hence, it is estimated that the UKHMLC will be visited by 3,000 people per day (375 per hour).
- 8.1.3. For the purposes of the trip generation and impact assessment two scenarios:
- 3,000 daily visitors (375/hour) - the typical scenario; and
 - 3,300 daily visitors (410/hour) - the robust scenario.
- 8.1.4. Admission to the UKHMLC will only be for visitors with a pre-booked ticket, therefore the visitor numbers would not exceed 410/hour since all admissions would be controlled.
- 8.1.5. It is also expected that additional visitors will wish to view the UKHMLC from the outside without entering. The most popular location for doing so is anticipated to be the northern portion of Victoria Tower Gardens. These trips are considered separately.

8.2. VISITOR TRIP GENERATION AND MODE SPLIT

CATEGORIES OF VISITOR

- 8.2.1. The anticipated visitor profile can broadly be split into the following three categories:
- Pass-by trips by tourists already in the local area as part of a more general visit e.g. to the Palace of Westminster and Westminster Abbey. The majority of visitors to the UKHMLC are expected to fall into this category, and to spend a relatively short time there due to a desire to visit a number of attractions in a day. Whilst they may be existing tourists on the wider network, these pass-by trips will still be required to obtain a ticket in advance;
 - Sole-purpose trips by members of the public who are likely to be familiar with (or live in) London and who choose to visit this location as a result of the newly UKHMLC. Such visitors may be expected to spend up to an hour at the Holocaust Memorial and Learning Centre; and,
 - Organised group trips. These may incorporate a longer session in the Learning Centre where a thematic activity can take place, for example a talk. A school trip or religious group visit would fall into this category.
- 8.2.2. It should be noted that many groups of tourists travel to or around London by organised coach (distinct from open top busses). These groups may already visit the Houses of Parliament and Westminster Abbey, so are likely to extend their visit to include the UKHMLC. These groups will be considered as part of the first category (pass-by tourists) since their mode of transport would be expected to remain the same as their current transport to Westminster, with just a short additional walk along Millbank to the UKHMLC. Consequently, they will not be treated as sole-purpose group trips for assessment purposes.

TRIP GENERATION RATES

- 8.2.3. For the purpose of trip generation and the assessment of impacts, the categories of visitor listed above, whilst informative, are not best suited to the detailed assessment of trip generation and distribution.
- 8.2.4. It is difficult to separate out pass-by and sole-purpose visitors who are not in organised groups. The Operational Business Plan produced by Barker Langham (an extract of which is contained as Appendix B of this report) estimates a range of possible annual visitor numbers between 300,000 as the lower-end benchmark and 890,000 as the higher-end benchmark, drawing upon other Holocaust memorials across the world³. A close comparison benchmark is also provided in the same document, estimating 500,000 annual visitors based on comparable sites including the Holocaust Memorial and Information Centre in Berlin⁴. Whilst this figure is the most comparable to the Development Proposals and is quoted most often within the report, the higher-end benchmark of 890,000⁵ is preferable for the basis of transport related calculations to ensure robustness. Furthermore, for robustness the total visitor numbers have been rounded up to 1,000,000 annual visitors; this is also the figure which is being used to inform the internal circulation strategy and pedestrian modelling. The comparator sites upon which these estimates are based are mostly located within city centres in close proximity to other major trip attractors (for example the Brandenburg Gate in Berlin) and the data does not distinguish between linked and sole purpose visitor trips.
- 8.2.5. Consequently, it is proposed to treat the total visitor numbers based on estimates by Barker Langham (1,000,000) as an input to the trip generation, and subsequently to break this figure into three categories for detailed analysis:
- School groups;
 - Special interest groups; and,
 - General admission visitors.
- 8.2.6. Each of these categories is considered in turn below.

SCHOOL GROUPS

- 8.2.7. The Operational Business Plan estimates that up to 100,000 pupils per year⁶ could visit the UKHMLC. The following comparable sites around London have been reviewed to assess the reliability of this assumption:
- The Houses of Parliament Education Centre - it is the closest match in terms of school group visitor numbers (projected to reach 100,000 per year by 2019) and is also located adjacent to the UKHMLC;

³ Barker Langham Operational Business Plan, paragraph 2.5.2.1

⁴ Barker Langham Operational Business Plan, paragraph 2.5.2.5

⁵ Barker Langham Operational Business Plan, page 9

⁶ Barker Langham Operational Business Plan Executive Summary, paragraph 4.2.1

- The Natural History Museum – much higher visitor numbers (4.6 million per year) but a useful reference point in terms of school visitors as a percentage of the total (5.6%⁷); and
- The Imperial War Museum as the closest match in terms of curriculum content, including exhibitions on the Holocaust as well as World War II more broadly. This museum received an average of 67,500 visitors a month in 2024⁸

8.2.8. The Learning Centre will accommodate pre-booked group visits who will be required to book in advance, thereby ensuring that these visits are staggered and thus minimising the peak effect. The Holocaust is a mandatory element of the Key Stage 3 history curriculum, and consequently there is likely to be a high level of demand from school groups to visit the Learning Centre. It is likely that most educational trips will take place during weekdays (i.e. school days) which will serve to offset the likely higher footfall by members of the public at weekends; a small number of overseas school groups may visit on weekends as part of a longer stay in the UK.

SPECIAL INTEREST GROUPS

- 8.2.9. It is considered beneficial to calculate the trips generated by special interest groups separately to general admission visitors, since the former are more likely to arrive by coach as an organised party.
- 8.2.10. However, having reviewed the above comparable sites both in the UK and mainland Europe, it has proven difficult to find data relating to organised groups which are not school visits and which are in a city centre location (given that the principal purpose is to estimate coach trips, it is not considered appropriate to use comparator sites in rural settings which may have limited public transport accessibility).
- 8.2.11. A working assumption will be that, out of a total of 1 million annual visitors to the UKHMLC, 60,000 of these will be visiting as special interest groups; their mode split is discussed in later sections. In due course, further dialogue with relevant special the anticipated number of special interest groups visiting the UKHMLC.

GENERAL ADMISSION VISITORS

- 8.2.12. The remainder of the total visitor numbers not ascribed to either school or special interest group visits will be assigned to the general admission category, of which there are projected to be 840,000 visitors per year.
- 8.2.13. The Barker Langham report does not quantify the proportion of visitors who are expected to be new trips to London as opposed to existing people on the transport network who add the Holocaust Memorial to their itinerary. It is noted that the average length of visits at the Berlin Holocaust Memorial's information centre is one hour⁹, and this will be taken as a robust duration of stay estimate for the UKHMLC. Consequently, it is reasonable to assume that the majority of visitors will combine their trip with other attractors or journey purposes in central London: Westminster attracts a worldwide

⁷ Natural History Museum Annual Review 2016/17, page 46

⁸ Monthly and quarterly visits to DCMS-sponsored museums and galleries - to September 2025, Table_1a

⁹ Barker Langham Operational Business Plan, paragraph 7.1.4

visitor profile and, while some Londoners will make a dedicated trip to the Memorial, the majority of visitors can be expected to visit several locations in the vicinity of the site.

- 8.2.14. As a consequence, it will be assumed that the majority of general admission visitors are existing trips on the pedestrian and public transport networks, and that the impacts of the Memorial on transport are principally in terms of extended or diverted pedestrian trips. The mode split calculations (see below) will take a robust approach towards the impact of additional footfall on nearby pedestrian routes, but it will be assumed that only a minority of visitors will be generating new trips on the wider transport network.
- 8.2.15. Parliament Square has a total annual footfall of approximately 4.4 million pedestrians at present¹⁰. With a projected 840,000 annual general admission visitors to the Memorial, this equates to 19.1% of the current Parliament Square footfall. Westminster Abbey and the Houses of Parliament are visited by over 928,000 and 1,164,000 people per year respectively, while the Tate Britain to the south draws a further 1,284,000 annual visitors¹¹. It could therefore be likely that most people visiting the Memorial would also be visiting at least one of these major attractors and would therefore not constitute new trips on the wider transport network, instead being new trips only on the pedestrian network between the Memorial and the other attraction(s) they are visiting on the same day.
- 8.2.16. It will be assumed that, of the 840,000 annual general admission visitors to the Memorial, approximately one third (280,000) will be new trips on the wider transport network and pedestrian network, with the remaining 560,000 appearing as new pedestrian trips from the existing attractors; the distribution of these trips is discussed in the following section.

8.3. VISITOR MODE SPLIT

GENERAL ADMISSION VISITORS

- 8.3.1. With the exception of blue badge holders, it is not anticipated that other general admission visitors will reach the site by car. This is a reasonable assumption given that the site has excellent public transport links, there is minimal car parking in the vicinity, and most visitor trips are likely to be linked rather than sole purpose which renders car travel less convenient.
- 8.3.2. The TRICS database was previously consulted to provide a shortlist of leisure attractions and religious buildings (two land use categories which most closely match the Memorial in terms of trip generation characteristics) to calculate the projected proportion of visitors who will arrive by taxi. Three sub-categories within the Leisure land use class were investigated, namely:
 - I – Art Galleries/ Museums;
 - S – Exhibition Centre; and
 - T – Place of Worship.

¹⁰ Barker Langham Operational Business Plan, paragraph 2.5.1

¹¹ Ibid

- 8.3.3. Sub-category **S – Exhibition Centre** only yielded one Greater London site (Olympia) which was deemed an unsuitable match as many taxi trips may be attributable to business visitors, especially given that the site is close to central London yet relatively inaccessible from it by public transport.
- 8.3.4. Sub-category **T – Place of Worship**, whilst containing three Greater London sites, was also deemed an unsuitable comparison given the outer London location of all sites.
- 8.3.5. Sub-category **I – Art Galleries/ Museums** yielded the London Transport Museum located in Covent Garden and was found to be the most comparable site for the Memorial taxi trip generation. Whilst the site was surveyed in 2009, it continues to have good public transport accessibility and large visitor numbers across a similar demographic, which remain unchanged in the past 10 years. Consequently, the proportion of Memorial visitors expected to travel by taxi will be based on the ratio of taxi trips to total trips in the Museum's dataset.
- 8.3.6. The TRICS database was also previously used to estimate the number of cycle trips to be generated by the Memorial site. Given the similar proximity to cycle routes, in addition to the factors listed above, the London Transport Museum was found to be the most comparable site for cycle trips to the Memorial site, and the number of cycle trips will be calculated as a proportion of general admission visitors before being subtracted from the number of trips assigned to public transport.
- 8.3.7. Given the sites' excellent public transport accessibility and limited availability of paid parking, it is assumed that only blue badge holders will travel to the site by car. For robustness, the 3% mode share figure from car driver and passenger numbers from the LT Museum will be used to estimate the blue badge users visiting the Memorial. These visitors will be a mixture of drivers (requiring blue badge parking) and visitors being dropped off, with their blue badges being used by their accompanying driver to park elsewhere. They are considered as a proportion of general admission visitors before being subtracted from the number of trips assigned to public transport.
- 8.3.8. Parking occupancy data from Atkins shows that the nearby bays suitable for disabled parking are at 70% capacity between 07:00-19:00. We will assume a dwell time of 1.5 hours: 15 minutes to and from the site and 1 hour to visit. This equates to the one bay on Smith Square accommodating two vehicles and eight paid for bays on Dean Stanley Street accommodating a total of 16 blue badge vehicles.
- 8.3.9. The remainder of visitor trips will be assigned between bus and Underground: the former offers convenience as bus routes 3 and 87 stop adjacent to the entrance (plus additional routes serving nearby Parliament Square), whereas the Underground is easier for visitors unfamiliar with London and is also a faster means of reaching Westminster.
- 8.3.10. As set out above, it will be assumed that one third of the general admission visitors will constitute new trips on the transport network with the remaining two thirds being existing visitors to other attractions who make additional journeys on foot.
- 8.3.11. The data which formed part of the Atkins pedestrian study 2025¹² has been analysed to calculate the ratio of footfall on the northern and southern approaches to the Memorial. Data from a Saturday has

¹² Atkins Vehicular and Pedestrian Movement Study, page 22

been used since it is likely to be more reflective of visitor patterns compared to weekends when footfall may be skewed by commuters rather than leisure visitors to Westminster.

- 8.3.12. On an average hour on Saturday, the footfall through Gate 1 is 345. By comparison, the footfall through Gate 5 and Gate 4 is 38 and 152 respectively. This gives an indicative ratio of 35% of pedestrian demand being to and from the south, with the remainder travelling to and from the north.
- 8.3.13. The residual number of general admission visitors who do not travel by car (blue badge holders) or taxi will therefore be distributed on the northern and southern Millbank approaches considering the ratio of existing footfall along these pedestrian routes, together with the projected mode and route of transport which visitors are anticipated to use.
- 8.3.14. It is proposed that visitors to the Memorial will be required to book advance tickets and tickets will not be available for sale within the memorial. Publicity will be used to make visitors aware of this prior to arriving in the vicinity of the Memorial. This will be complemented by other potential means of issuing tickets on the day but not at the Memorial (for example through arrangements with nearby attractions or staff positioned on nearby routes). Together, these arrangements would mean that prospective Memorial visitors would be unlikely to proceed to Victoria Tower Gardens without a ticket.
- 8.3.15. Once further details are known regarding the anticipated methodology for ticket sales, more precise calculations of pedestrian footfall along different sections of the footway can be undertaken.

SCHOOL GROUPS

- 8.3.16. Research on comparable central London attractions drawing large numbers of school visits found that the majority of trips originated from outside London.
- 8.3.17. Looking particularly at school visits to the Houses of Parliament Education Centre across two weeks in the months of May and June has revealed that an average of 16 out of 79 school groups per week are from the Greater London area, equating to 20%. In the 39-week academic year, this equates to 3,081 total school visits to the Houses of Parliament Education Centre per year of which 624 are London-based.
- 8.3.18. Given the close proximity of the Houses of Parliament Learning Centre to Victoria Tower Gardens, a similar distribution of school visitors is expected for the Memorial, given that both of their topics of focus form part of the national curriculum and some school groups may indeed choose to combine the two Learning Centres in a single visit.
- 8.3.19. Precedent from Houses of Parliament shows that 50% of school visits originate from outside London. The schools are more likely to organise to make the journey by coach.
- 8.3.20. With 195 school days per year, and an estimated 80,000 school visitors from outside of London (pupils and staff combined) anticipated to visit the Memorial, this equates to 410 school visitors per day from outside London. The nearby Houses of Parliament Education Centre is aiming to reach 100,000 school visitors per year by 2019 from 45,000 in 2015¹³. Its recommended duration of visit for school

¹³ Parliament Education Centre Website - <https://www.parliament.uk/educationcentre>

groups is 2 hours 15 minutes, making it unlikely that a school trip from outside London would visit the capital just for Parliament.

- 8.3.21. A new Memorial alongside Parliament would therefore represent a logical destination for the second part of a day-long visit, especially given that both *'Notions of Political Power, Elections and Democracy'* and the occurrence of the Holocaust are compulsory elements within the history national curriculum with other related topics throughout Key Stages 2 and 3. As such, a school might take two history classes to the Milbank area, with each starting at either of the attractors (Parliament and the Memorial) and swapping over after a lunch break. This provides a greater incentive for schools to visit the area – covering two elements of the national curriculum, whilst also recognising the coach parking limitations within Westminster by combining two visits from a single drop-off.
- 8.3.22. It will therefore be assumed that, of the 100,000 projected annual school visitors, 20,000 will be from London and will be assumed to travel by public transport, while the remaining 80,000 will travel by coach. Of these, it will be assumed that half (40,000) are existing visitors who are adding an extra destination to their stay, who will be assumed to be only new trips on the pedestrian network and not the wider transport network since they may walk as a group to nearby attractions such as Parliament.
- 8.3.23. The remaining 40,000 new visits by schoolchildren and accompanying adults (who may also go on to visit other destinations as part of their trip). However, for robustness, even the existing trips being extended to incorporate a visit to the Memorial will be treated as new trips for transport assessment purposes, since (unless already visiting the nearby Parliament Learning Centre) they are likely to require coach laydown space which they do not currently use.
- 8.3.24. The projected 80,000 annual school visitors from outside London equate to 410 people per school day; with an average coach capacity of 50, this is equivalent to 9 coaches per day– they would not generate coach trips on the 170 days a year which fall outside of term.
- 8.3.25. It is understood that 50% of the existing school visits to the Houses of Parliament Learning Centre arrive by coach, indicating that a proportion of visits from outside London use public transport. However, for robustness, an 80% figure will be used as discussed above, since this has a more onerous requirement for coach bays.

The school groups arriving by public transport will be assessed using the same methodology as for general admission visitors described above.

SPECIAL INTEREST GROUPS

- 8.3.26. The range of special interest groups anticipated to visit the Memorial will have a range of mobility needs and transport preferences. Some may comprise elderly or infirm visitors for whom coach is the most comfortable means of transport for them, while others will be able-bodied adults who can travel most efficiently by public transport.
- 8.3.27. At this stage it is not possible to predict the precise demographics which will visit the Memorial, a working assumption will be that half will travel by public transport and half by coach. Special interest group visits are assumed to take place across all days of the week.
- 8.3.28. With 30,000 special interest group visitors arriving by coach and a capacity of 50 people per coach, this equates to up to two coaches per day.
- 8.3.29. The special interest groups arriving by public transport will be assessed using the same methodology as for general admission visitors which is described above.

8.4. VISITOR NUMBERS BY TIME AND MODE

8.4.1. **Tables 8-1 and Table 8-2** below summarise the estimated trip generation on weekdays during school term-time for the 3,000 and 3,300 scenarios, respectively. As shown, the numbers of Special Interest and School Group visitors remain the same in both scenarios, with General Admission visitors filling the rest of the tickets. This reflects the fact that 'no shows' are considered to be much less likely amongst organised group tours.

Table 8-1 - 3,000 Daily Visitor Trips on a weekday during school term-time

Mode	General Admission	Special Interest Groups	School Groups	Total
On foot (only)	1,556	0	0	1,556
Public Transport*	736	83	103	922
Cycles	2	0	0	2
Car (blue badge)	23	0	0	23
Taxi	5	0	0	5
Coach**	0	83	410	493
Total	2,322	166	513	3,000

Subject to rounding errors

* Refer to para 8.2.15

**Coach numbers are given in passenger numbers. 50 trips = 1 vehicle.

Table 8-2 - 3,300 Daily Visitor Trips on a weekday during school term-time

Mode	General Admission	Special Interest Groups	School Groups	TOTAL
On foot (only)	1,757	0	0	1,757
Public Transport	831	83	103	1,017
Cycle	2	0	0	2
Car (blue badge)	26	0	0	26
Taxi	5	0	0	5
Coach**	0	83	410	493
Total	2,622	166	513	3,300

Subject to rounding errors

**Coach numbers are given in passenger numbers. Up to 50 passengers can be accommodated in one coach.

- 8.4.2. Outside of school term-time, the total number of tickets sold will remain the same at 3,300, with the 3,000 visitor scenario also being assessed. The 513 school trips will be reallocated to General Admission for robustness. The 166 visitors assigned to Special Interest Groups remains unchanged. In the event of a greater number of Special Interest Groups visiting outside school term-time, the number of trips by public transport or by coach would be no greater than those assessed in other scenarios.
- 8.4.3. **Tables 8-3 and Table 8-4** show the trips generated outside of school term-time for 3,000 and 3,300 daily trips, respectively.

Table 8-3 - 3,000 Daily Visitor Trips on a weekday outside school term-time

Mode	General Admission	Special Interest Groups	TOTAL
On foot (only)	1,899	0	1,899
Public Transport	899	83	982
Cycle	2	0	2
Car (blue badge)	28	0	28
Taxi	6	0	6
Coach	0	83	83
Total	2,834	166	3,000

Table 8-4 - 3,300 Daily Visitor Trips on a weekday outside school term-time

Mode	General Admission	Special Interest Groups	TOTAL
On foot (only)	2,100	0	2,100
Public Transport	994	83	1,077
Cycle	3	0	3
Car (blue badge)	31	0	31
Taxi	6	0	6
Coach	0	83	83
Total	3,134	166	3,300

- 8.4.4. The tables above demonstrate that the majority of visitors are expected to be existing trips on the pedestrian network who divert to the Memorial. Of the remainder, the majority will travel by public transport and only blue badge holders are expected to travel by car. It could be assumed that two visitors would travel in each car and therefore a maximum of 15 car trips in each direction would be generated on the busiest day.

HOURLY PROFILE

- 8.4.5. In order to assess the trip generation across the course of a day, a number of considerations have been made. It has been assumed that all school coaches would arrive between 10:00-15:00 in order to allow sufficient time for a one-hour visit, departing between 11:00-16:00 so as to avail of the coach bay. School parties from within London, travelling by public transport, and therefore not constrained by the hours of operation of the coach bay, will be distributed between 09:30-16:30 to allow for a one-hour visit.
- 8.4.6. The same assumptions have been applied to Special Interest Groups: coaches will arrive between 10:00-15:00, while groups travelling by public transport will arrive between 09:30-16:30.
- 8.4.7. Special Interest Groups are assumed to arrive at an evenly throughout the day by public transport, with coaches not arriving or departing during the hours of operation of the bus lane (i.e. arriving only between 10:00-16:00). It can be reasonably assumed that pre-booked groups travelling by coach would only book tickets at times when they can conveniently drop off or pick up visitors.
- 8.4.8. General Admission visitors will take up the remaining tickets in each hour throughout the day. None of these arrivals are constrained by the hours of operation of the coach bay and thus all of them will arrive between 09:30-16:30.
- 8.4.9. **Table 8-5** sets out the visitor arrivals anticipated during any given hour between 10:00-15:00 during school term-time. **Table 8-6** shows the figures in an hour between 10:00-15:00 outside of term-time. For robustness both tables consider a scenario with 3,300 visitors.

Table 8-5 - Hourly Visitor Entries between 10:00-11:00 on a neutral weekday (3,300 scenario)

Mode	General Admission	Special Interest Groups	School Groups	TOTAL
On foot (only)	195	0	0	195
Public Transport	92	10	13	115
Cycle	0	0	0	0
Car (blue badge)	3	0	0	3
Taxi	1	0	0	1
Coach	0	17	82	99
Total	291	27	95	413

Table 8-6 - Hourly Visitor Entries between 10:00-11:00 on a weekday outside school term-time (3,300 scenario)

Mode	General Admission	Special Interest Groups	School Groups	TOTAL
On foot (only)	258	0	0	258
Public Transport	122	10	0	132
Cycle	0	0	0	0
Car (blue badge)	4	0	0	4
Taxi	1	0	0	1
Coach	0	17	0	17
Total	385	27	0	413

- 8.4.10. As set out above, it is expected that school coach group arrivals would be spread evenly throughout the day given that visitors from outside London may visit more than one attraction in the capital and that coaches would arrive and depart throughout the day due to the time restrictions on the coach bay.
- 8.4.11. For robustness, a further scenario is considered whereby all school coach groups arrive between 10:00-12:00, due to spending the whole day in Westminster. Coaches would still only use the coach bay to drop off groups before parking off-site and returning later in the day to collect passengers before 16:00.
- 8.4.12. **Table 8-7** shows the hourly visitor arrivals between 10:00-11:00 on a weekday during school term-time if all school coaches arrive between 10:00-12:00. As this scenario is being presented for robustness, the figures assume 3,300 daily visitors and also assume that Special Interest coach groups also arrive across the whole day during coach bay operating hours. **Table 8-7** therefore represents the maximum number of coach visitors who would arrive in any one hour; the actual number is likely to be much lower.

Table 8-7 - Hourly Visitor Entries between 10:00-11:00 on a weekday during school term-time (3,300 scenario with all school coaches arriving before noon)

Mode	General Admission	Special Interest Groups	School Groups	TOTAL
On foot (only)	113	0	0	113
Public Transport	53	10	13	76
Cycle	0	0	0	0
Car (blue badge)	2	0	0	2
Taxi	0	0	0	0
Coach	0	17	205	222
Total	168	27	218	413

- 8.4.13. Group visits to the Memorial are assumed to have a duration of one hour. It is likely that school groups from outside London would take the opportunity to visit multiple attractions in the capital. Given the proposed time limits on use of the coach drop-off bay (waiting is only permitted for the time required to load or unload passengers, with all other waiting or parking prohibited), school groups visiting in the afternoon would depart by 16:00 is travelling by coach.
- 8.4.14. As set out above, the trip generation distinguishes between existing visitors to other attractions in the local area (who are expected to walk to the Memorial as part of their day trip and are represented by the 'On foot (only)' category) and new trips, most of which are expected to be by public transport. With the exception of those visitors arriving on bus routes 3 and 87 which stop directly outside the Memorial, public transport users would also constitute pedestrian trips on the local pedestrian network (principally to and from Parliament Square) and thus the top two lines will be combined for the purposes of pedestrian impact assessment.
- 8.4.15. The methodology takes a robust approach in assuming that general admission and special interest groups will be spread evenly across all days of the week. On weekdays there is greater existing demand for coach bays in the vicinity of Millbank due to the aforementioned commuter coaches which start and terminate their journeys in Westminster; patronage on the public transport network is also higher. Consequently, if general admission visitors are in fact more likely to visit on Saturdays and Sundays where existing transport demand is lower, the development would result in a lesser impact.

8.5. ADDITIONAL VISITORS TO VICTORIA TOWER GARDENS

- 8.5.1. Supplementary to the visitors entering the UKHMLC, additional visitors are expected to enter Victoria Tower Gardens to view the Holocaust Memorial from the outside without entering it.

- 8.5.2. Given that access to Victoria Tower Gardens would remain free and unrestricted, visitor numbers to the gardens will relate to existing footfall plus future demand for viewing the Holocaust Memorial without entering it. Projections of the garden's footfall will inevitably have a much greater range than visitor numbers for the Holocaust Memorial itself since the former has completely unrestricted entry.
- 8.5.3. The number of visitors to the gardens is expected to be much lower than the current footfall of nearby public open spaces such as Parliament Square, since only a portion of Westminster pedestrians are tourists, and not all of these will choose to also view the Holocaust Memorial.
- 8.5.4. The flow of tourists in and out of the gardens will also vary throughout the day in line with tourist behaviour, as opposed to visitors to the UKHMLC itself who will be spread evenly throughout the day, given that the same number of tickets are available in each hour.
- 8.5.5. As set out in section 8.2, it is anticipated that the UKHMLC will draw approximately two thirds of its general admission visitors from the existing footfall in Parliament Square, with the remaining one third being new trips to the area with the primary purpose of entering the UKHMLC. It is assumed that all visitors whose primary trip purpose is to visit the UKHMLC would choose to enter it (i.e. would be counted within the 3,300 daily ticketed entries), and thus all additional visitors to Victoria Tower Gardens will be assumed to be existing pedestrians on the network who make a detour to view the UKHMLC from the exterior.
- 8.5.6. It will be assumed that new visitors to Victoria Tower Gardens will be pass-by trips on foot and will therefore be distributed on the pedestrian network. These will all be treated as existing trips on the wider pedestrian network, and the UKHMLC is not anticipated to add new trips to the footways beyond Millbank and Abingdon Street since Parliament Square is the principal access point to the area (via Westminster Underground station) and also the site of major attractions such as Westminster Abbey and the Houses of Parliament.
- 8.5.7. In order to estimate the number of additional visitors to the gardens, a shortlist of sites has been drawn up which share certain characteristics in common with Victoria Tower Gardens. In particular, sites have been selected for which external footfall can be estimated, albeit with a large margin for error where – as in the case of Victoria Tower Gardens – access to the external areas is free and uncontrolled.
- 8.5.8. Sites for comparison should satisfy one or more of these criteria:
 - Be located within a major city, in an area with daily footfall in the millions;
 - Have an element of paid or restricted entry as well as a significant amount of publicly accessible and viewable space;
 - Offer a visual appeal which would justify a visit without necessarily entering the interior;
 - Offer a cultural appeal which would encourage many of those who have travelled to the site to visit the interior and not just observe the exterior;
 - Be of commemorative or historical significance.
- 8.5.9. The aim of this comparison is to estimate the number of people, in addition to the 3,300 daily ticketed visitors, who are expected to view the UKHMLC from within Victoria Tower Gardens without entering it.
- 8.5.10. The following sites have been considered for comparison with the proposed UKHMLC and its situation within Victoria Tower Gardens:

- **Berlin – Memorial to the Murdered Jews of Europe:**
 - Central location with high footfall, close to Brandenburg Gate;
 - Memorial to the Holocaust;
 - A large immersive outdoor space with unrestricted free access, plus an Information Centre which is free but has a limited capacity.
- **Washington DC – United States Holocaust Memorial Museum:**
 - Central location with high footfall, on the National Mall;
 - Memorial to the Holocaust;
 - Entry charge only for the Permanent Exhibition during summer to manage demand, with free access during winter as well as to the rest of the Museum at all times.
- **Washington DC – National Museum of African American History and Culture:**
 - Central location with high footfall, on the National Mall;
 - Free entry with timed tickets;
 - Visually significant from the exterior.
- **New York – 9/11 Memorial and Museum:**
 - Central location with high footfall, in Lower Manhattan;
 - Free entry to the Memorial, with paid entry to the Museum;
 - Visually significant from the exterior.
- **Paris – Mémorial de la Shoah:**
 - Central location, on the Right Bank;
 - Memorial to the Holocaust;
 - Free entry.
- **London – Cutty Sark, Greenwich:**
 - High exterior footfall;
 - Visually significant from the exterior.
- **London – National Maritime Museum, Greenwich:**
 - High exterior footfall;
 - Visually significant from the exterior;
 - Free entry.
- **London – Tower of London:**
 - High exterior footfall;
 - Visually significant from the exterior.

8.5.11. It is anticipated that the additional visitors to the gardens intending to view the UKHMLC from the exterior will be existing pedestrians on the surrounding network of footways; given that viewing the UKHMLC constitutes a leisure activity, it can be assumed that these trips would be an extension of tourists' visits to other nearby attractions in Westminster. It is therefore helpful to consider comparator sites whose visitor numbers are influenced by the presence of other nearby attractions, leading to tourists visiting multiple attractions consecutively.

- 8.5.12. Twelve of Smithsonian Institution museums in Washington DC are located along the National Mall, which receives a total of 25 million visitors per year¹⁴. Individual visitor numbers are also available for each museum, with the National Museum of American History and Culture (which is free to enter) receiving 3.8 million visitors in 2017¹⁵. Around a quarter of the visitors to the National Mall entered the National Air and Space Museum, the most visited of the Smithsonian group¹⁶. It can therefore be seen that only 15% of visitors to the surrounding area entered the National Museum of American History and Culture.
- 8.5.13. Two key points arise from these statistics. Firstly, it is reasonable to assume that the number of visitors to individual attractions increases as a result not only of surrounding footfall (which represents the potential catchment) but also surrounding attractions, leading to a compounding of attractiveness. This can be observed in Washington where the National Mall is in itself a landmark and also provides a dozen individual museums to enter, increasing the likelihood of a tourist attracted by one museum choosing to add other museums to their itinerary. Secondly, in 2017 a total of 23.24 people visited the twelve Smithsonian museums on Washington Mall, less than the total footfall along it. It is likely that many pedestrians did not enter any museums, with others entering multiple attractions for the reasons set out above.
- 8.5.14. This information is relevant to the proposed UK Holocaust Memorial because it suggests that, even in a high-footfall location which houses multiple attractions, the number of annual entries is less than the annual pedestrian flow. Furthermore, the National Mall is not a pedestrian thoroughfare in the same way as Parliament Square in Westminster as the latter's pedestrian counts include a large number of commuters. Consequently, the number of additional visitors to Victoria Tower Gardens is expected to be significantly lower than the current Parliament Square footfall given that any individual attraction only draws a minority of the total number of tourists present in its environs.
- 8.5.15. The Cutty Sark and National Maritime Museum in Greenwich are both run by Royal Museums Greenwich, whose total visitor numbers (including the Queen's House and the Royal Observatory) total 2.45 million per year¹⁷. Like the UKHMLC, there are a number of visitor attractions in close proximity to one another and, whilst not located in central London, Greenwich is nevertheless a popular destination for tourists and arguably the heritage destination most comparable to Westminster in another part of London.

¹⁴ <https://www.nps.gov/nationalmallplan/Documents/Media/NAMA%20Fact%20Sheet.pdf> – accessed 6/11/18

¹⁵ <https://www.statista.com/statistics/258338/visits-to-smithsonian-museums-and-institutions/> - accessed 6/11/18

¹⁶ Ibid

¹⁷ Royal Museums Greenwich Annual Report 2016-7

- 8.5.16. The average daily visitor numbers to the combined Royal Museums Greenwich would equate to approximately 6,700, however these vary between the four sites: the Cutty Sark is the most visually iconic of the four but also carries an entry charge, while the National Maritime Museum is the largest and the Royal Observatory is popular as a viewpoint as well as an attraction in its own right. The visitor numbers to the combined Royal Museums on a busy day could be expected to be double the daily average; exact numbers are not available as most visitors will not purchase tickets for entry.
- 8.5.17. The Tower of London is the UK's most visited paid attraction, with over 2.8 million visitors in 2017. It also draws a high external footfall but much of this is linked to Tower Bridge, the most iconic Thames crossing. The average number of internal visitors to the Tower of London 7,789 per day, but the additional external visitors are not expected to be disproportionately significant compared to the internal numbers, despite the paid entry. The Tower of London's internal exhibits are particularly popular among foreign tourists with an interest in the history of the monarchy, and the site is located on the edge of Central London; most visitors travelling there can be expected to visit the Tower internally, and thus the additional external trips might constitute an extra 50% uplift.
- 8.5.18. The subject of the UKHMLC means that a number of worldwide Holocaust memorials can also be studied for comparison. The Memorial to the Murdered Jews of Europe in Berlin was visited by an estimated 10,000 people a day during its first year of opening¹⁸. The concrete stelae at ground level are freely accessible 24 hours a day and, due to the lack of entry controls, counting visitor numbers is difficult. The basement Information Centre is a closed space and the statistics for 2017 recorded 470,000 visitors, a figure which has remained almost constant since 2006, the first full year of opening¹⁹. The total estimated footfall at ground level is therefore higher than the number of visitors to the Information Centre.
- 8.5.19. The US Holocaust Memorial in Washington DC has been visited by 43 million people since it opened in 1993, equating to an average of 1.7 million visitors a year. It is located close to the National Mall and, like the proposed UKHMLC, will comprise a combination of passing footfall and bespoke trips.
- 8.5.20. The Mémorial de la Shoah in Paris draws 188,000 visitors per year²⁰. Whilst it is centrally located in a capital city, the site is principally an internal memorial and does not have a significant external visual appeal compared to the proposed London memorial. This makes the Paris memorial a less directly comparable site.
- 8.5.21. Having researched a number of comparator sites, it is considered that the Berlin memorial represents the best proxy for estimating the trip generation of the UKHMLC, not just due to its subject matter but also due to several common characteristics between the two sites:
- Like the proposed UKHMLC, the Berlin site is on a major thoroughfare close to the Brandenburg Gate, arguably the city's most iconic attraction and comparable to the Houses of Parliament;

¹⁸ <http://www.touristberlin.com/berlin-holocaust-memorial/> - accessed 6/11/18

¹⁹ <https://www.stiftung-denkmal.de/en/memorials/the-memorial-to-the-murdered-jews-of-europe/numbers-of-visitors.html> - accessed 6/11/18

²⁰ Mémorial de la Shoah Annual Report 2016

- Neither site is directly visible from the nearby iconic attraction, leading to visitors walking a short distance along the thoroughfare in order to view the Memorial;
- A basement information centre complements the outdoor structure;
- Projected annual visitor numbers to the UKHMLC are of a comparable order of magnitude to Berlin.

- 8.5.22. It is therefore projected that an additional 10,000 visitors per day will enter the gardens once the United Kingdom Holocaust Memorial is open. This is very much a robust scenario, especially when compared to the US Holocaust Memorial Museum whose average daily visitor numbers are less than half this figure. The Tower of London is visited by an average of 7,789 internal visitors per day and, if an allowance were to be made for an additional 50% external footfall, the forecast for the Memorial is close to this comparator from London as well as the example of Berlin.
- 8.5.23. Of the projected 10,000 daily visitors, 3,300 will be ticketed visitors to the UKHMLC and the remaining 6,700 will view it from the exterior. It is assumed that ticketed visitors will enter the gardens 15 to 30 minutes before their allotted slot in order to allow time to walk to the UKHMLC entrance. For robustness it is assumed that all of the existing users of the gardens will also be present in future.
- 8.5.24. The 3,300 daily ticketed visitors will be distributed evenly across the UKHMLC's opening hours, with visitors assumed to arrive in the gardens 15 and 30 minutes before their entry slot. The 6,700 additional visitors to the gardens will be spread across the whole day using the temporal distribution of the existing footfall on Abingdon Street alongside the Houses of Parliament, which can be taken as the best proxy for patterns of tourist footfall in this part of Westminster. This temporal distribution also closely matches that of the entries and exits through Gate 1 of the gardens
- 8.5.25. For robustness the ticketed visitors arriving by public transport (a maximum of 3,177 per day) are all assumed to enter and exit the gardens via Gate 1. Furthermore, 90% of the additional visitors to the gardens (6,030 out of 6,700) are also assumed to enter and exit via Gate 1 as this is the closest to the public transport stops and visitor attractions on Parliament Square; the analysis of existing footfall indicates that only 53% of current visitors to the gardens enter and exit via Gate 1 on a typical Saturday, and therefore 90% is very much a robust scenario.
- 8.5.26. **Figure 8-1** shows the hourly rolling two-way pedestrian flow through Gate 1 on a Saturday, the busiest day.

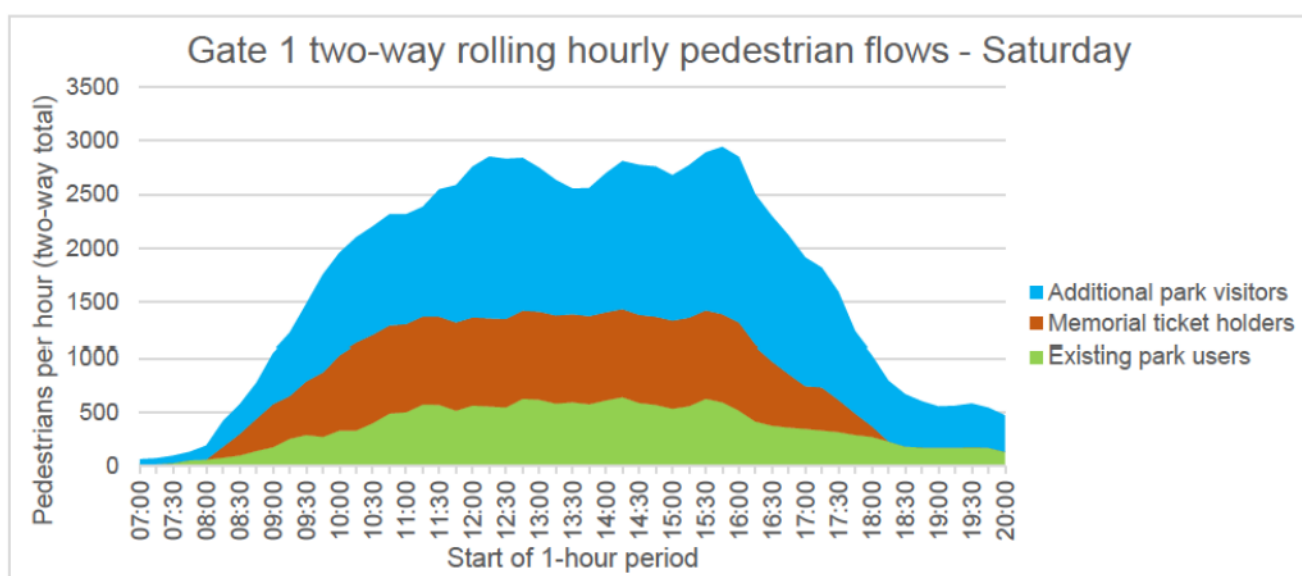


Figure 8-1 - Hourly rolling two-way pedestrian flow through Gate 1

- 8.5.27. As **Figure 8-1** shows, the pedestrian flow through Gate 1 does not exceed 2,850 people per hour, equivalent to one entry or exit per second. Furthermore, these movements are balanced such that, in the busiest hour, no more than 1,486 pedestrian movements are occurring in one direction.

8.6. STAFF TRIP GENERATION AND MODE SPLIT

- 8.6.1. The UKHMLC is anticipated to employ approximately 20 staff members, which is considered a small number relative to the number of visitors (as visits will be largely self-guided, given the immersive nature of the Memorial design).
- 8.6.2. No on-site car parking is proposed, and the site is served by excellent public transport links, it is anticipated that all staff will travel by public transport and their impact on the network will be negligible.
- 8.6.3. In the event of an employee being a disabled motorist, they would be eligible to apply for a blue badge parking permit to use one of the existing bays a short distance from the site. It is noted that Westminster Underground station and the bus services stopping on Millbank are wheelchair accessible, and there is therefore excellent provision for disabled staff members to travel to and from work by public transport.

8.7. SERVICING TRIP GENERATION

- 8.7.1. Servicing demand is based upon the requirements of the café and, separately, the Holocaust Memorial and Learning Centre.
- 8.7.2. A Waste Management Plan is being submitted, which will be developed as further details regarding the project become available. The principal guidance documents which will be consulted are Westminster City Council's Recycling and Waste Storage Requirements (2023) and British Standard BS5906:2005 – Waste Management in Buildings – Code of Practice. Individual waste and recycling requirements will be calculated for each of the waste-generating sources (namely the WCs, flexible meeting, offices and café) to which the appropriate standards for those use classes will be applied within the two sources listed above.
- 8.7.3. Initial contacts have been made with the WCC team relating to waste storage volume requirements for the UKHMLC based on indicative floor areas. Further details are provided in the Waste Management Plan. This will be refined and further tested with WCC as the design and waste management strategy evolves, as well as following the appointment of an operator for the café.
- 8.7.4. The most robust assessment is that waste would be collected daily from the site, generating one vehicle trip. In practice this would be a pass-by trip in that Millbank is already used by existing private waste collection vehicles servicing nearby buildings, as well as Royal Parks waste collection with which the UKHMLC's waste collection could possibly be combined.
- 8.7.5. The café is relatively small and could be expected to generate one LGV servicing trip per week. There is an existing café in the gardens and therefore this would not be a new vehicle trip on the road network.
- 8.7.6. The servicing requirements of the UKHMLC besides waste are expected to be negligible due to the limited floorspace; back-of-house functions will be limited to staff welfare and day-to-day admin, with more strategic administration taking place off-site. The principal form of servicing trip is anticipated to be occasional HGV deliveries at times when temporary exhibitions are being installed and uninstalled, which could generate around 20 HGV trips per year.

8.8. FORECAST DEMAND

- 8.8.1. To assist in providing a new demand forecast WSP has considered a number of Committed Developments within an area around the UKHM site. As part of the new application an assessment of forecast demand should be considered in order to determine whether there is a requirement to provide updated background demand.
- 8.8.2. The future baseline scenario will require an appreciation of Committed Developments to understand if footfall is likely to increase with and without the development.
- 8.8.3. The original application and TA included several Committed Developments which were categorised as the Committed future baseline and committed future baseline with the UKHMLC under construction. The sites listed are now a number of years old and are now deemed to be negligible to the overall pedestrian demand in the vicinity of the UKHM site.
- 8.8.4. The sites listed in the 2018 Transport Assessment are now a number of years old and have been updated to assess the changes in demand which have taken place since 2017.
- 8.8.5. An updated list of sites and their proposals is provided in **Table 8-8**.

Table 8-8 - 2025 Committed Development Proposals

Planning Reference	Name / Location	Time scales	Proposals
21/01508/FULL	Westminster House, 7 Millbank	Permission granted February 2022	Demolition of existing office building and erection of new nine storey building using new and reclaimed materials for 15,823 sqm GIA commercial business and service use (Class E); extension to Smith Square.
18/09095/FULL	Millbank Tower, 21-30 Millbank	Permission granted April 2022	Refurbishment and replacement of facades and erection of 3 additional floors with 215 private residential flats and 232 bedroom hotel.
20/04393/RG3	Jonathan Street/ Orsett Street	Permission granted November 2021	Demolition and clearance of both sites and redevelopment to provide a new community centre (Class F2) and 67 residential units.
17/02936/FUL	Graphite Square, Vauxhall Walk	Construction due to complete Q3 2025	Mixed-use development to provide 160 residential units, offices (use class B1), a ground-floor flexible retail/café/office (flexible use class A1/A3/B1), a replacement Methodist church (use class D1).
15/03470/VOC	Westminster Tower, 3 Albert Embankment	Permission granted April 2016	Refurbishment to provide office (B1 Use) accommodation at lower levels; 34 residential units on upper levels. Amendment in April 2016 to remove 11 shared ownership units and 742sqm of office space.
20/04425/RG3	Denby Court, 99 + 109 Lambeth Walk	Permission granted November 2024	Redevelopment of the site comprising 141 residential dwellings (Class C3) in five buildings ranging between 4 and 11 storeys.
22/01206/EIAFUL	Royal Street - Land North And South Of Royal Street	Permission granted December 2023	The Development Proposals provides: 133 residential units, 158,858 sqm GIA commercial space (including office and lab enabled space), 4,792 sqm GIA retail, food & beverage, gym, community and cultural uses. 372 sqm GIA meeting space for office and community use.

- 8.8.6. The transport impact of these committed developments is outlined below in **Table 8-9**. This table shows the net impact of the developments, demonstrating a change from the site's existing use. Trips are split between mode to reflect the changes in travel patterns and provide a more detailed perspective on the type of transport which may increase along Millbank, which greatly effects traffic flow.
- 8.8.7. These committed development schemes, along with the associated figures, are to be assessed in the transport ES chapter, which will be submitted alongside this report in the latest application. The transport ES chapter will analyse this data further, focusing on topics like driver delay and pedestrian amenity.

Table 8-9 - 2025 Committed Development Trip Uplift

Name / Location	Net Pedestrian Trips		Net Cycling Trips		Net Motor Vehicle Trips		Net Daily Servicing Trips
	AM	PM	AM	PM	AM	PM	Daily
Westminster House, 7 Millbank	+5	+5	+5	+5	+1	+1	+8
Millbank Tower, 21-30 Millbank	+61	+174	-62	-58	-51	-47	+12
Jonathan Street/ Orsett Street	+7	+6	+1	+1	+5	+3	+3
Graphite Square, Vauxhall Walk	+34	+30	+17	+15	-22	-22	+26
Westminster Tower, 3 Albert Embankment	+7	+4	+2	+2	+5	+5	-
Denby Court, 99 + 109 Lambeth Walk	+32	+26	-4	-3	+14	+3	+11
Royal Street - Land North And South Of Royal Street	+233	+195	+475	+396	-23	-22	+378
Total	+379	+440	+434	+358	-71	-33	-

- 8.8.8. **Table 8-9** above demonstrates how a significant amount of walking and cycling trips are to be generated by these consented developments. A total of 379 walking trips in the AM and 440 walking trips in the PM will be added to the surrounding pedestrian network. Additionally cycling mode share has greatly increased, largely at the expense of vehicle trips which are predicted to fall among new developments. This is in part due to strict restrictions on parking for new developments.
- 8.8.9. It is important to note that these increases whilst being within the list of Committed Developments does not specifically add a significant number of pedestrian movements to Millbank (eastern footway) as they will likely use other routes to get to their destination in the peak hours. At this stage we have not considered the need to remodel the pedestrian demand in the future year as a result of these changes as the proportionate effect is considered to be negligible.
- 8.8.10. The largest increase is within servicing vehicle trips which will increase rather than decrease. However, when divided per hour, the number of servicing trips is still forecast to be low, with the peak of these trips likely not aligning with that of the holocaust memorial.
- 8.8.11. In terms of pedestrian trips, it is unlikely that the trips from cumulative schemes will affect the development in the long term due to the fact that these trips will be disbursed through such a wide and unpredictable area.

- 8.8.12. In summary WSP has reviewed the committed developments within a 20m walk radius of the site and these indicate a net reduction in traffic but an increase in pedestrian movements. The increase in pedestrian movements have been assessed in Section 9 of this report. The accessibility of Westminster, due to number of public transport services and high Public Transport Accessibility Levels result in a wide distribution of trips. Close to the UKHM site the majority of visitors use Westminster Underground station to visit the Palace or Westminster and Westminster Abbey and to view the Houses of Parliament from Parliament Square.

TFL LAMBETH BRIDGE SCHEME

- 8.8.13. As previously highlighted TfL is after a number of years now implementing the Lambeth Bridge scheme. This was first tabled around 10 years ago, and this was assessed by TfL at that time illustrating the impacts of the proposals on journey times. At the time of the previously submitted TA, the scheme was not committed or funded. However, since the previous decision the works have been funded. The works involve conversion of the existing roundabout on Lambeth Bridge North to a signalised crossing. At this stage we do not have any additional information on the impacts beyond what was previously submitted. However, the scheme will add some additional delays to traffic movements on Millbank as a result.
- 8.8.14. The scheme was also designed to support additional cycling and the survey data taken from the DfT cameras identifies a significant increase in cycle movements on Millbank since the submission of the previous TA. Whilst not an impact of the TfL scheme it would have some implications for cyclists due to the coach parking strategy. Further discussions with TfL should be sought to ensure that this application is still considered acceptable.
- 8.8.15. The scheme may also result in some changes to coach routing as the scheme includes a number of banned movements. The banned movements were highlighted in the scheme consultation, and these should be confirmed by TfL. Some of the previous bus routings have also changed as a result.
- 8.8.16. Overall, the UKHM scheme would not have any specific impacts on the TfL scheme and as a result we conclude that that there is a negligible impact. Visitors arriving at the site from the southern end of Millbank on foot and by cycle, will benefit from this upgrade to the improvements in safety. However, vehicle trips generated to the site via Millbank may have to navigate through slower traffic conditions. Given that the junction works add dedicated signalised crossing facilities these changes are considered to be positive overall.

9. TRANSPORT IMPACT ASSESSMENT

9.1. INTRODUCTION

- 9.1.1. This section assesses the impacts of the trips generated by the Development Proposals and sets out the measures proposed to mitigate the impacts. Due to changes in travel demand and transport accessibility within the surrounding area, some of the development's impacts have been altered based on the 2025 baseline when compared to the 2018 Transport Assessment baseline.

9.2. PEDESTRIANS

- 9.2.1. The number of people within Victoria Tower Gardens will increase compared to the baseline conditions as a result of additional visitors to view the UKHMLC from the exterior plus the passage of ticket holders walking to the Memorial entrance. However, this increase is not proposed to be as large as the projected impacts of the 2018 application, due to aforementioned changes in travel habits.
- 9.2.2. **Figure 9-1** shows the number of people who are projected to be in the gardens at any given time compared to the existing situation.

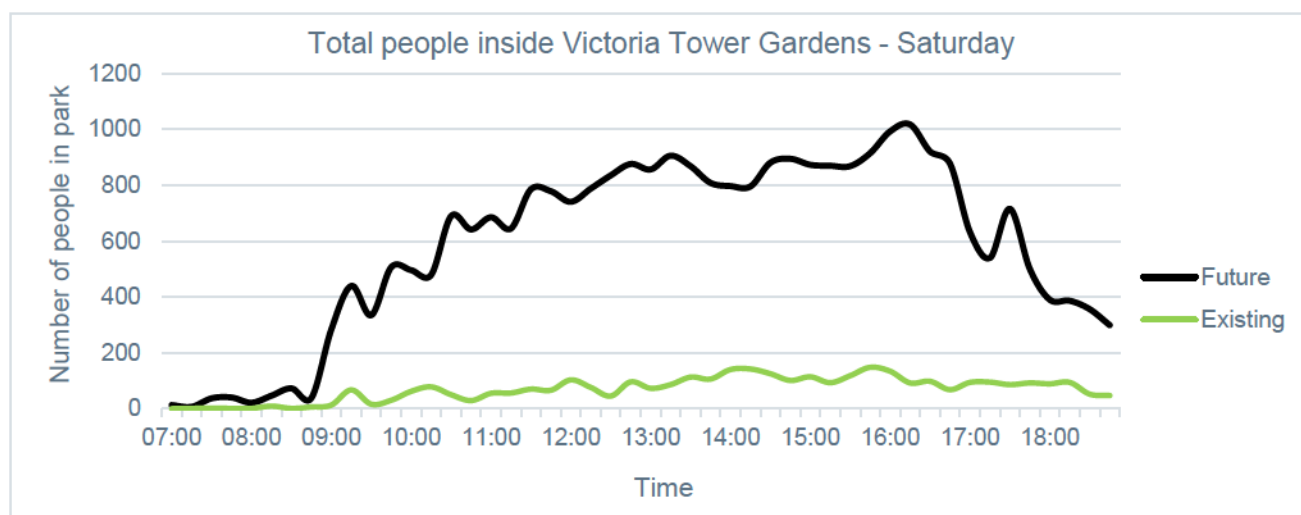


Figure 9-1 – Sum of Pedestrian flows at all entrances on Saturday

- 9.2.3. While the number of pedestrians inside the gardens will increase to a maximum of 1,018. people at any one time, there is still ample space for all users of the gardens to circulate. This is a notably lower peak than what was forecast in the 2018 application, which forecast a peak of 1,269 due to the higher pedestrian flows into the park during the existing conditions.
- 9.2.4. While the majority of visitors are anticipated to be already on the wider pedestrian network (in particular visiting the Houses of Parliament or Westminster Abbey), the presence of the UKHMLC will generate a localised increase in footfall along the eastern footway on Millbank.
- 9.2.5. It is considered that the proposed scheme design mitigates pedestrian impacts along this footway in several ways:
- The majority of visitors will approach from the north and can access the UKHMLC by entering Victoria Embankment Gardens via Gate 1, which is likely to represent a more attractive option given the view of the Thames;

- The new visitor cycle parking is proposed to be located along the western footway on Millbank in order to minimise obstruction of the eastern footway. The cycle parking is located opposite the UKHMLC and can be easily accessed using Gate 3 and the zebra crossing;
 - Visitors arriving by coach or using the blue badge bays can use Gates 3 or 4;
 - Visitors approaching from the south or east can enter via Gates 4 or 5.
- 9.2.6. Consequently, the site layout encourages pedestrians to make full use of all the site entrances, with the result that negative impacts on the pedestrian network are minimised.
- 9.2.7. There are a number of formal and informal pedestrian crossing points along Millbank as illustrated in **Figure 6-6**. The majority of pedestrians entering the UKHMLC or viewing it within the gardens will access Victoria Tower Gardens via Gate 1 and will therefore not walk along the eastern footway of Millbank. Furthermore, the number of additional pedestrians crossing the road at the crossing points in **Figure 6-7** is expected to be significantly lower than the footfall along Millbank given that the coach parking is situated along the eastern kerbside and there are no major trip attractors in the area west of Millbank.
- 9.2.8. Formal Crossings 2, 3 and 4 are likely to be the most used amongst the small residual number of visitors to the UKHMLC who will walk along the western footway of Millbank. These crossings connect Gates 3 and 4 to the western side of Millbank which accommodates the visitor cycle parking and bus stop NK which is served by route 87 towards Trafalgar Square. Crossing 2 is located immediately south of Dean Stanley Street while Crossings 3 and 4 (across the northbound and southbound lanes respectively) are located immediately north of the Horseferry Road roundabout.
- 9.2.9. A robust assessment of pedestrian demand using these crossings assumes that the following visitors to the UKHMLC will use them:
- Blue badge holders, robustly assuming they will all drop off along the western kerbside or park along streets west of Millbank. In practice many may be dropped off along the eastern kerbside;
 - Cyclists parking on the western pavement;
 - 25% of the pedestrians travelling to and from locations south of the UKHMLC (i.e. not to and from Parliament Square). It is considered likely that 50% would walk along the eastern footway of Millbank and Horseferry Road as this is a more appealing walking route towards the Tate than the western kerbside, as the latter does not offer the same view of the river. 25% would cross Lambeth Bridge and therefore would not use these crossings;
 - 5% of visitors arriving by public transport, alighting or boarding bus 87 at stop NK and other nearby stops. The vast majority of public transport users are expected to use Westminster station and would therefore not cross Millbank.
- 9.2.10. Of the pedestrians using the crossings, 50% will be allocated to Crossing 2 and 50% to Crossings 3 and 4 (using both in succession). Cyclists would be likely to use the crossing most convenient for the cycle racks they have used. The latest Atkins modelling shows a reduction in flows and the therefore the previous assumptions are still valid.
- 9.2.11. During the busiest one-hour period, it is estimated that a total net increase of 18 people would cross Millbank in each direction using Crossing 2, with the same number using Crossings 3 and 4. This would equate to less than one additional person per minute using each crossing.
- 9.2.12. Given that existing crossing demand is up to 500 people per hour, the additional crossing events generated by the UKHMLC would have a negligible impact on traffic flow. Whilst the number of additional crossing events may appear low in comparison to the overall trip generation of the

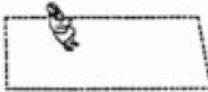
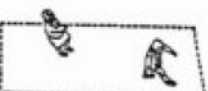
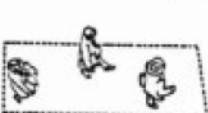
UKHMLC, it should be borne in mind that the vast majority of visitors will travel to and from Parliament Square and thus will use neither the eastern Millbank footway south of Gate 1 nor any of the pedestrian crossings along it.

- 9.2.13. A Pedestrian Comfort Level (PCL) calculation has been undertaken to compare the existing and proposed PCLs along key sections of footway. PCL calculations measure the level of pedestrian comfort based on the peak hourly two-way footfall and the effective footway width, taking into consideration obstructions such as street furniture as well as a buffer zone from the edge of the kerb.
- 9.2.14. PCL calculations have been undertaken for a weekday and a Saturday for the following locations:
- Abingdon Street eastern footway north of Gate 1: retention of current width including the constraint of the hostile vehicle mitigation barrier;
 - Abingdon Street eastern footway north of Gate 1: with additional width gained by reconfiguration of the hostile vehicle mitigation barrier;
 - Gate 1;
 - Millbank immediately south of Gate 3 (section of footway used by visitors travelling by coach, cycle, car and taxi);
 - Millbank south of Gate 4 (section of footway used by visitors approaching from the south).
- 9.2.15. The two study periods which are being considered are a weekday PM peak, when UKHMLC visitors may coincide with commuters, and a Saturday daytime peak when visitor numbers are expected to be at their highest.
- 9.2.16. **Table 9-1** shows the PCL at each location during the weekday and Saturday peak periods. According to the 2025 Atkins survey, the weekday peak is from (17:00 to 18:00) and the Saturday peak is from (13:00 to 14:00).

Table 9-1 - Pedestrian Comfort Level (PCL) comparison of existing and future scenarios

Section of Abingdon Street / Millbank Footway	Effective Width (metres)	Existing Weekday PM flow (pph)	Existing Weekday PCL	Future Weekday PM flow (pph)	Future Weekday PM PCL	Existing Saturday flow (pph)	Existing Saturday PCL	Future Saturday flow (pph)	Future Saturday PCL
North of Gate 1 (current layout)	1.9	1539	B	3441	C+	1256	B+	3960	C+
North of Gate 1 (revised layout)	8.05	1539	A	3441	A-	1256	A+	3960	A-
Gate 1	4.12	1316	A	3650	B	967	A	3315	B
South of Gate 3	2.8	339	A+	545	A	229	A+	435	A+
South of Gate 4	1.8	341	A	403	A	229	A+	291	A+

- 9.2.18. As shown in **Figure 9-1** above, the footway immediately north of Gate 1 is currently at a medium level of pedestrian comfort (B) during the weekday peak, as a result of the narrowed footway due to the presence of the hostile vehicle mitigation barrier. A minor relocation of this would lead to a significant improvement in PCL, attaining A on a weekday and A+ on Saturday. Discussions with the relevant authorities will explore options for a minor modification to the hostile vehicle mitigation barrier at this location if they are required, however advice from the security consultant is that the measures are to be maintained.
- 9.2.19. Whilst PCL is based upon pedestrian movement through a constrained location (such as a gate or a narrowing along the footway), ease of pedestrian movement within a larger space can be categorised using Fruin's Levels of Service, a six-point scale illustrated in **Figure 9-2**.

A	Normal walking speed can be freely selected & slower pedestrians can be easily overtaken. Crossing conflicts can be easily avoided.	
B	Sufficient space is available to select normal walking and to bypass other pedestrians in primarily one-directional flows. Where there are reverse-direction or crossing movements, minor conflicts will occur.	
C	Restricted ability to select normal walking speed & freely pass others. High probability of conflict where crossing movements & counter-flows exist. Conflict avoidance requires frequent adjustment of walking speed & direction. Flow is reasonably fluid, however considerable friction & interaction between pedestrians is likely to occur.	
D	Restricted walking speed; overtaking slower pedestrians is difficult. Counter-flows & crossing movements severely restricted. Some probability of reaching critical density causing temporary stoppages.	
E	Walking speed & passing ability is restricted for all pedestrians. Forward movement is possible only by shuffling. Counter-flows & crossing movements extremely difficult. Flow volumes approach limit of walking capacity.	
F	Severely restricted walking speed; frequent unavoidable contact with others; reverse or cross movements are virtually impossible. Pedestrian flow is sporadic & unstable.	

Source: Pedestrian Planning and Design, John J. Fruin, 1987

Figure 9-2 - Fruin's Levels of Service

- 9.2.20. As part of the 2018 Transport Assessment, a Fruin Level of Service (LoS) modelling exercise was undertaken at the northern end of the park. This includes the area around Gate 1 which will have the highest footfall, has been undertaken for the Saturday peak hour when pedestrian numbers are projected to be at their highest. The modelling is further broken down into 15 minute segments to provide even greater detail.
- 9.2.21. It should be noted that, as the most recent Atkins survey has proven, the current LoS in the area around Gate 1 is likely significantly lesser than those in the 2018 LoS modelling due to a decrease in pedestrian flow.
- 9.2.22. **Figure 9-3** below shows the results of the 2018 modelling. These demonstrate that Gate 1 operates at Fruin LoS C with a small occurrence of LoS D at the northern end of the gate for short periods.

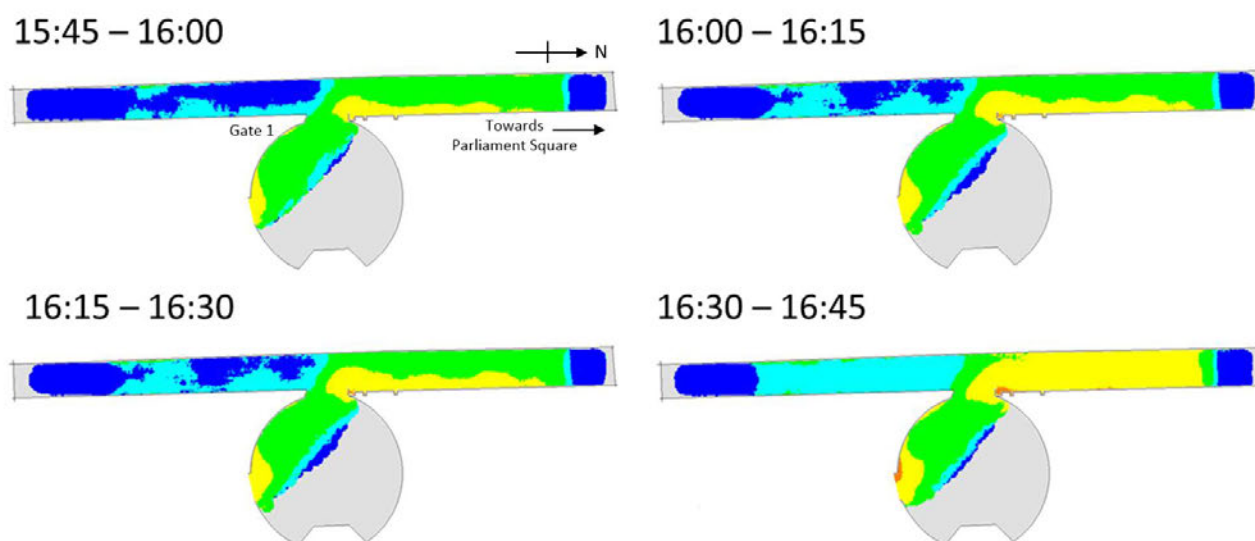


Figure 9-3 - Fruin Level of Service analysis of Gate 1 at peak

As shown in **Figure 9-3**, Gate 1 has sufficient capacity to accommodate pedestrian flows even at the busiest times. This is likely even more so the case currently, as pedestrian flows have fallen over time.

- 9.2.23. At the time of the previous application considerations were being given to the pedestrianisation of Abingdon Street and the northern part of Millbank (as far south as Great Peter Street); a second option is to pedestrianise the entirety of both roads as far south as Horseferry Road.
- 9.2.24. The first proposal would not significantly impact upon the Development Proposals, as the vehicular trip generation is minimal and coaches would still be able to access the potential coach bay on Millbank; servicing vehicles too would be able to enter the site. Furthermore, it is likely that the existing bus stops would be removed as the routes would be expected to be diverted, thereby freeing up kerbside space for servicing and blue badge parking.
- 9.2.25. In the case of a full pedestrianisation as far south as Horseferry Road, alternative servicing arrangements would need to be sought. The number of servicing trips generated by the site is anticipated to be low, and the distance from nearby roads (for example Dean Stanley Street) is low, so it may be possible to service using nearby on-street space. Discussions will take place with WCC and TfL in the event that these proposals are progressed.

9.3. CYCLISTS

- 9.3.1. Cycle use on Millbank has increased considerably since the previous UKHM application the number observed in 2024 increased to 7876 from 5929 in 2017 as shown in Table 6-3.
- 9.3.2. The mode split section indicates that cyclists form a minority of visitors to the UKHMLC. As shown in the trip generation tables, an estimated 3 additional cyclists will be added to the network during the peak daily scenario.
- 9.3.3. It is considered that the proposed scheme design mitigates cycle impacts in the area by providing more visitor parking spaces (34) than the anticipated maximum number of daily cycle visitors (3). This will also benefit other cyclists not travelling specifically to visit the UKHMLC by providing additional capacity at existing cycle parking locations on Millbank. The proposed visitor cycle parking is to be secured by planning condition.

- 9.3.4. The existing bus lane will be safeguarded by retaining its restrictions between 07:00-10:00 and 16:00-19:00 on weekdays, which are the peak times for commuter cycling.
- 9.3.5. Given that the majority of visitors to the UKHMLC are expected to be tourists, many of whom will be from outside London, the site's proximity to several Santander Cycle Hire docking stations also encourages additional visits by bicycle.

9.4. PUBLIC TRANSPORT

- 9.4.1. As described in Chapter 4, Westminster underground station is served by up to 113 trains per hour, and the bus stops on Millbank are served by up to 37 busses per hour.
- 9.4.2. The 132 maximum hourly arrivals to the UKHMLC by public transport (**Table 8-6**) will have a negligible loading impact on any single public transport service, further mitigated by the fact that visitor patterns will not overlap with existing commuter peak periods.

9.5. COACHES

- 9.5.1. Coach visitors to the UKHMLC will be accommodated using the coach bay provided alongside the gardens. It is envisaged that the bay will be subject to a 'loading only' restriction which only allows coaches to remain stationary for the time required for loading or unloading.
- 9.5.2. As discussed above, the trip generation anticipates up to 11 coaches per day serving the UKHMLC. For robustness it will be assumed that all coaches arrive between 10:00-12:00 and depart between 14:00-16:00. Loading is the most onerous scenario, since it typically takes longer (up to 15 minutes) than unloading (5 minutes). Provision of a 30m coach bay will allow up to eight coaches per hour to load, and thus the proposed bay is of a sufficient size to accommodate the UKHMLC's coach trip generation, whilst also being subject to sufficiently restrictive time limits as to deter other coaches from using the bay for unauthorised waiting.
- 9.5.3. As described in TfL's guidance document *Operating Coaches in London*, the closest coach parking to the UKHMLC site is on Horseferry Road, providing a maximum of two hours of parking. There are three bays in this location operating between 08:30-23:59 (no overnight parking) and is chargeable between 08:30-18:30 from Monday to Friday. Atkins survey data indicates that the bay has a high occupancy rate, used mainly by commuter coaches setting off towards Kent. Given the estimated 22 coach movements (11 drops and 11 pick-ups) daily, it is important to identify feasible parking further afield where coaches can park throughout the duration of their passengers' stay. The following additional coach parking has been identified:
- Millbank South (three bays) – operating between 08:30-23:59 (no overnight parking) providing a maximum of 4 hours of parking; and
 - Albert Embankment North (nine bays) – operating between 10:00-16:00 and 20:00-07:00, providing a maximum of one hour parking, no returns within two hours.
- 9.5.4. A Coach Parking Management Strategy has also been produced, summarising the measures proposed to manage coaches parking away from the UKHMLC between the times when they drop off and pick up visitors. This document is appended as **Appendix C**.

9.6. SERVICING

- 9.6.1. The majority of the site's servicing requirements are anticipated to be accommodated on-site using the servicing space provided adjacent to the bin store.

- 9.6.2. This will be complemented by use of the new on-street servicing bay between 10:00 and 16:00.
- 9.6.3. The impact assessment will review the Atkins survey findings to establish the existing level of servicing demand along Millbank and is expected to demonstrate that the UKHMLC's servicing demands can be accommodated by the Development Proposals without leading to additional trips being attracted by the new on-street bay.
- 9.6.4. A Waste Management Plan is being produced, setting out the means by which waste will be managed within the site and collected. Refuse collection will take place on-site outside of the UKHMLC's hours of operation.

9.7. TRAFFIC FLOW

- 9.7.1. As set out in **Table 8-6** and **Table 8-7**, a maximum of 31 car trips, 6 taxi trips and 11 coach trips in each direction are anticipated to be generated by the UKHMLC on any given day. The UKHMLC would also be expected to be served by up to one waste collection vehicle each day and one servicing vehicle for the café per week, but these are expected to be diversions of existing trips on the highway network.
- 9.7.2. The existing Annual Average Daily Traffic flow along this section of Millbank is 12,800 vehicles, and thus the impact of an additional 78 vehicle movements on the road would be negligible.
- 9.7.3. It is noted that the majority of vehicle trips would take place outside of the existing peak hours of traffic flow along Millbank, since most visits to the UKHMLC will take place outside of the AM and PM commuter peaks.

9.8. HEALTHY STREETS ASSESSMENT

- 9.8.1. The Proposed Development scheme includes design alterations at the Millbank interface with the public highway, and this has been demonstrated through a Healthy Streets Check for Designers. This Healthy Streets assessment was conducted in 2018 as part of a prior planning application. Since then, very little has changed regarding the existing transport conditions on site, as well as the transport proposals. Therefore, this assessment is still seen as relevant for the current application.
- 9.8.2. To note, the proposals do not generate any significant change to the Millbank interface with the exception of eastern kerb activity. The highway proposals are indicated on the proposed scheme layout plan at Appendix A and improvements include:
 - Improved quality of walking surface, through implementation of modified accesses and associated resurfacing as appropriate;
 - Improved surveillance through increased activity; and
 - Improved landscaping / sense of place.
- 9.8.3. These improvements are considered to reflect TfL's 'Healthy Streets Check for Designers' agenda, and this has been demonstrated through a Healthy Streets audit of the existing and proposed Millbank interface arrangements for comparison.
- 9.8.1. In summary, the Healthy Streets Check is a spreadsheet tool to support designers. It helps any proposed changes to the way streets are laid out or used to result in improvements. Specifically, the assessment audits the Millbank interface with the application site against ten Healthy Streets Indicators, drawing a comparison to baseline conditions.

9.8.2. **Figure 9-4** shows the Healthy Streets indicators against which the Development Proposals is assessed.

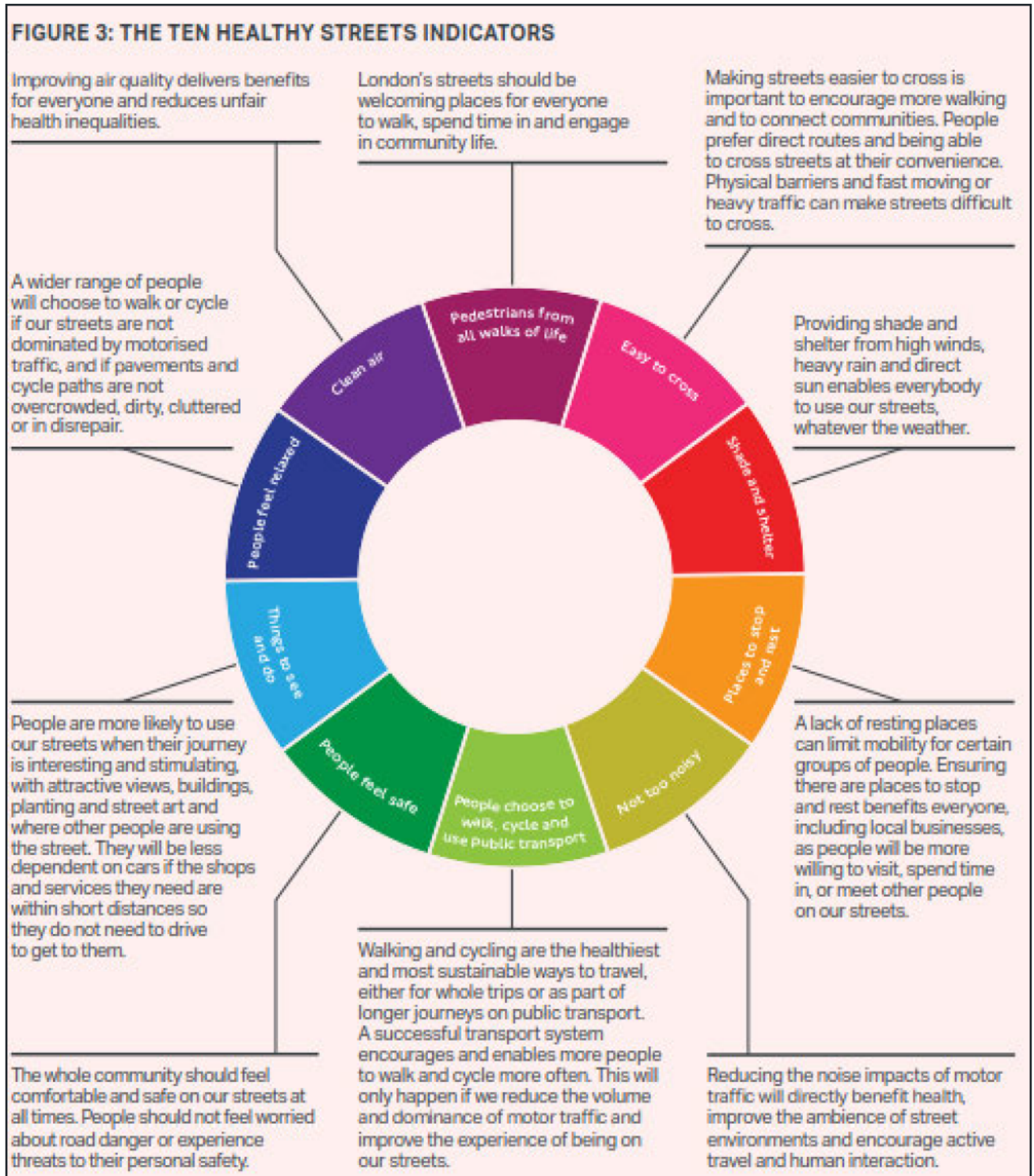


Figure 9-4 - The ten Healthy Streets Indicators

9.8.3. The Healthy Streets audit for the Millbank baseline arrangement received a score of 70%, scoring well on crossing facilities, effective footway widths, quality of walking surfaces, lighting, surveillance and street trees. No metrics received 'zero' scores.

9.8.4. The Healthy Streets audit for the proposed Millbank interface arrangement received a score of 65% with one metric receiving 'zero' score. As outlined above the scheme does not significantly alter the Millbank interface except for the eastern kerbside design to facilitate coach drop-off and pick-up without reducing bus stop capacity for TfL busses.

9.8.5. **Figure 9-5** below shows the Healthy Streets audit results for the section of Millbank affected by the Development Proposals.

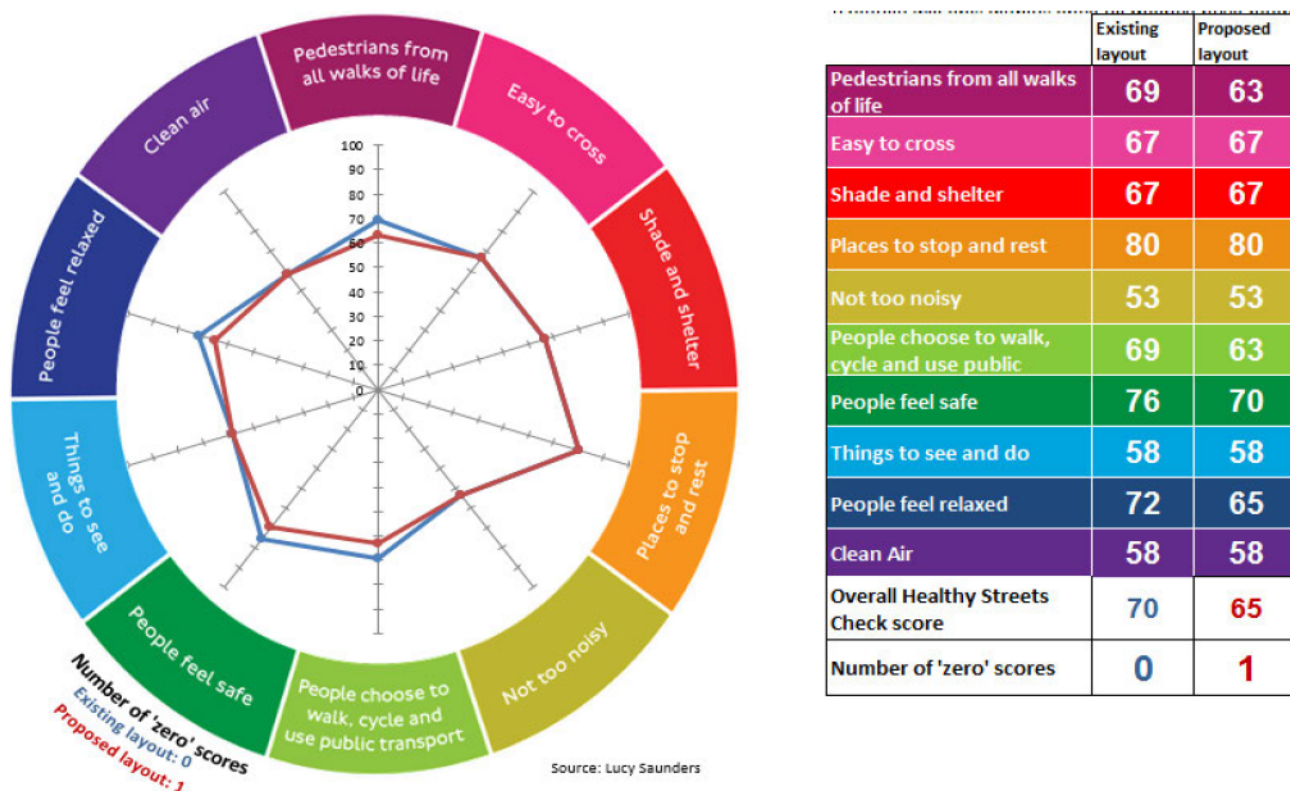


Figure 9-5 - Millbank Healthy Streets audit results

9.8.6. It is concluded that the Millbank interface scores well in both the existing and proposed scenarios when assessed using the Healthy Streets Audit. The proposals do not significantly alter how pedestrians interact with Millbank, and the existing infrastructure creates a healthy environment for all users.

9.8.7. As highlighted in Figure 9-5, the proposed scheme results in a slight reduction in the Healthy Streets score following alterations to the existing bus and general traffic lane on the eastern side of the carriageway adjacent to the site. This has a minor effect on cyclists using Millbank; however, this is not expected to significantly impact existing cyclists using the route.

9.8.8. The full Healthy Streets Audit report is provided in **Appendix D**.

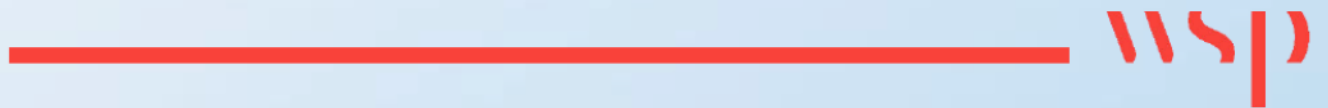
10. CONCLUSION

- 10.1.1. WSP has been appointed by the Ministry of Housing, Communities & Local Government to provide transport consultancy to support the Development Proposals of the UK Holocaust Memorial and Learning Centre within the City of Westminster.
- 10.1.2. A Transport Assessment was produced by WSP in November 2018 for the 2019 application. Due to this application proposing a largely similar design regarding transport infrastructure, many of the details within this report have been retained. Within this TA, attention has been paid to changes in the surrounding transport network and baseline conditions, which will affect the degree to which the site impacts the transport network. A review of Committed Developments has also been undertaken.
- 10.1.3. Some small revisions to the design have been undertaken following review by the applicant and these are landscape, fire safety and aesthetic in nature. These changes in themselves have not had a bearing on the overall conclusions of the transport assessment.
- 10.1.4. The updated analysis demonstrated very little change in traffic movements between 2017 and 2024. There has been a large increase in cycle movements on Millbank due to increased cycling in central London.
- 10.1.5. The updated Atkins survey undertaken in 2025 illustrates a large reduction in pedestrian movements since the 2017 survey. This is the primary change in background conditions since the previous application.
- 10.1.6. The UKHMLC is projected to be visited by up to one million people a year, most of whom will be existing pedestrians on the wider network given the site's proximity to major trip attractors around Parliament Square. This has not changed from the 2018 application and therefore the impacts of the Proposed Development are as previously assessed.
- 10.1.7. Due to the reduction in pedestrian movements in the Atkins 2025 survey, it is concluded that the worst case assessment as previous submitted has not changed, and the impacts on pedestrian movements in the area are considered negligible. Since the application was considered acceptable by the Planning Inspector and a Memorandum of Understanding was agreed with WCC transport officers in transport terms previously, we conclude that they should remain acceptable as a result of the updated assessment.
- 10.1.8. There have been little or no change to the surrounding network with the exception of the TfL Lambeth Bridge scheme which is now being implemented. This will provide improved crossing facilities and safer facilities for cyclists using UKHM. The only implications for the UKHM scheme resulting from the TfL scheme is the change to some bus services and the need to review the Coach Parking Strategy as part of a future discharge of planning condition. Further discussions with TfL and WCC are expected to discuss the implementation of the Coach Parking Strategy.
- 10.1.9. A Travel Plan and Delivery and Servicing Plan will also be secured by condition and will detail the on site management aspects prior to operation. The visitor cycle parking proposed on Millbank will also be secured by a planning condition.
- 10.1.10. A comprehensive transport assessment of the Development Proposals has been undertaken in order to determine the anticipated transport impacts of the UKHMLC's operation and setting out the measures to mitigate these impacts where appropriate.

- 10.1.11. Through a carefully considered design supplemented by some changes to the kerbside arrangements immediately adjacent to the site, coach groups can be accommodated without unduly impacting on other road users along Millbank. Detailed pedestrian analysis has also been undertaken to highlight the locations with the highest footfall at different times.
- 10.1.12. There are limited changes to the London Plan and Westminster City Plan including adoption of the current London Plan and Westminster City Plan since submission of the 2018 application, including some recent consultations to both documents. We can confirm none of these changes have any bearing on transport aspects of the scheme.
- 10.1.13. In conclusion, the impacts and effects of the updated application and minor design changes are consistent with those undertaken in 2017/2018. As a result, the Proposed Development is still considered to have a negligible impact on the highway and public transport and active travel modes.

Appendix A

PROPOSED KERBSIDE ARRANGEMENT



Appendix B

TICKETING REPORT (EXTRACT)

WSP

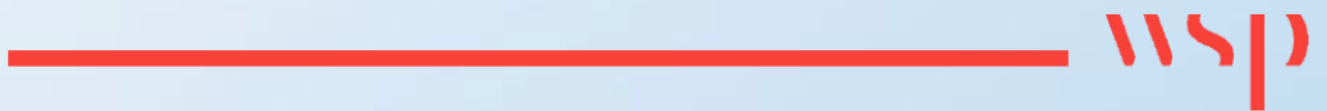
Appendix C

COACH PARKING MANAGEMENT STRATEGY



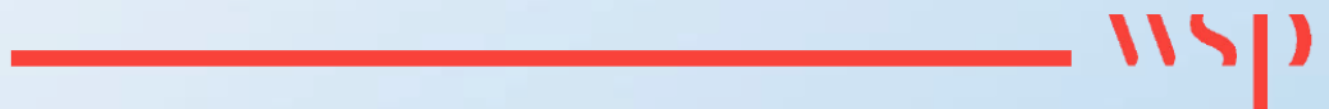
Appendix D

HEALTHY STREETS ANALYSIS



Appendix E

ATKINS PEDESTRIAN SURVEY 2025





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