

HOLOCAUST MEMORIAL BILL
HOUSE OF LORDS SELECT COMMITTEE
PROMOTER'S OMNIBUS NOTE ON INFORMATION REQUESTS,
SUGGESTED AMENDMENTS AND RECOMMENDATIONS

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09 December 2024

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Territorial restrictions			
<i>Information requested</i>			
Promoter requested to draft an amendment on spatial extent	Committee	COM-208 paras. 250 to 256	The Promoter does not consider that an amendment is necessary or desirable. In any event, it refers to the Committee's note to the Promoter, <i>Undertakings, Recommendations and Assurances</i> , received on 06 December 2024, to which the Promoter has responded in Annexe 3, paragraph 7 of which relates to the Committee's requested assurance on this issue.
<i>Amendments proposed</i>			
At end of Clause 2, add: “provided that any such memorial and centre for learning constructed on the land so described shall not occupy a surface area greater than 1,429 square metres, including in that total area any entrance pavilion, courtyard and ramp into the learning centre, associated hard standing, service access, new access paths, the parts of the mound not accessible to the public and areas enclosed to ensure the security of the memorial and centre for learning.’ OR If flexibility to change the design / planning permission is required: “provided that any such memorial and centre for learning constructed on the land so described shall not occupy a surface area greater than 1429 square metres, including in that total	B Doctor KC group of petitioners, including the London Historic Parks and Gardens Trust	PET-014 items 1 and 2 PET-007 slide 4	This is a more developed version of the London Historic Parks and Gardens Trust's Amendment B. As explained by Mr Katkowski KC on 20 November 2024 (COM-209 para. 446), the Promoter understands that the underlying idea behind this amendment is that there should be a geographic limitation on the extent of the lifting, in colloquial terms, of section 8(1) and (8) of the 1900 Act. However, as Mr Katkowski explained, the form of the draft amendment proposed does not provide sufficient certainty that further attempts to frustrate the construction and operation of the HMLC will not be forthcoming. This is because every square metreage and percentage that has been put forward by the Promoter has been the subject of repeated challenge and controversy by opponents of the proposed HMLC, including several of the petitioners appearing before the Committee. It would therefore be a recipe for endless litigation and dispute were an amendment specifying a square metreage or percentage to be adopted. This is without prejudice to the Promoter's principal submission that an amendment of this type is not necessary or appropriate.

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area any building or facility or access path, security feature or fenced area which in each case is intended for the purposes of or associated with the memorial and centre for learning.”			
Recommendations suggested			
None			
Timing restrictions			
Information requested			
None			
Amendments proposed			
Timing – delivery in an acceptable timescale [no specific wording proposed by the Petitioner]	Buxton Society	HMB-013	The Promoter is concerned that this proposed amendment is vague and non-specific. No guidance is given as to what is an “<i>acceptable</i>” timescale, nor the person by whom such a determination is to be made. The Promoter submits that this is ultimately a matter best left to the ordinary planning process. The planning permission (if granted) will be subject to a mandatory condition requiring the HMLC development to be commenced within a specified timeframe, with the standard period being three years (see section 91 of the Town and Country Planning Act 1990). If the HMLC is not brought forward within the applicable period then the planning permission would lapse and there would accordingly be no impact on VTG. Conversely, if the planning permission is granted, this will in due course require the submission of a construction management plan for the project to the local planning authority, Westminster City Council, which will then govern the practical implementation of the project post-

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			commencement including appropriate management of any relevant identified impacts.
Clause 2, add new sub-clause: "This section will cease to have effect at the end of 2029, except for the use, maintenance and operation of any buildings already completed or under construction by virtue of this section."	B Doctor KC group of petitioners Supersedes the amendments proposed by the London Historic Parks and Gardens Trust ('Amendment C') and the Thorney Island Society	PET-014 item 7	This is a revised version of the Amendment C originally proposed by the London Historic Parks and Gardens Trust and by the Thorney Island Society. As explained by Mr Katkowski (COM-209 paras. 154 to 155), as originally proposed this amendment would provide that clause 2 of the Bill should cease to have effect at some future point in time. This cannot be achieved simply because clause 2 must continue to have effect once the HMLC is inaugurated as it will be used and operated on an on-going basis thereafter. This is made clear by clause 1, which is cross-referred to in clause 2 and relates not only to construction, but also to use and operation. Great care would need to be taken in the drafting of any such provision. Whilst the revised amendment goes some way towards rectifying the defects in the amendments originally proposed by the London Historic Parks and Gardens Trust and the Thorney Island Society (see below), nevertheless the Promoter has no control over the planning process and when construction might begin. The amendment would incentivise continued legal challenge by providing objectors to the proposal with the opportunity to seek further delays until the sunset clause came into effect. Whilst it would be the Promoter's intention to proceed expeditiously with the project if planning permission is granted, it does not have any controls over when that might be and it would be clearly undesirable that if construction was not able to commence by a particular date that it would then have to return to Parliament with a further Bill to disapply the provisions of s.8(1) and (8) of the 1900 Act, with the further delays which would result. .
Recommendations suggested			
None			

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Alignment with Palace of Westminster restoration			
<i>Information requested</i>			
Scope of discussions between HMLC programme team and the Palace of Westminster	Committee		Regular meetings take place between the MHCLG team responsible for taking forward the HMLC and representatives of different projects and functions within the Palace of Westminster. These meetings cover matters – such as traffic and logistics as well as the use of VTG - arising in connection with the HMLC and with projects such as the restoration of Victoria Tower and the wider Restoration and Renewal programme, which are at different stages of development. All parties are fully aware of the formal status of Victoria Tower Gardens and of the extent to which VTG is currently used.
<i>Amendments proposed</i>			
Add new clause: “The activities described in section 1(1) may not be carried out on the land referred to in section 2 unless the authorities of the two Houses have certified that the planned restoration and renewal of the Palace of Westminster (“R&R”) will not make use during construction of any part of Victoria Tower Gardens”	B Doctor KC group of petitioners, including Baroness Deech	PET-014 item 11	As explained by Ms Lean for the Promoter in oral submissions (COM-210 paras. 184 to 202), the practical effect of this proposed amendment is to put an obstacle in the way of the delivery of the proposed HMLC in a Bill the principle of which is to enable the project to go forward. It essentially makes clause 2 of the Bill dependent on a condition precedent – the certification that the R & R project will not make use during construction of any part of VTG. It thus cuts across the principle of clause 2 of the Bill as approved at Second Reading. It is also unclear from the proposed amendment whether the certification envisaged is that the R&R project would not make use of any part of VTG for construction purposes, or (as the Promoter assumes to be the proposal) that the R & R project would not make any use of VTG during the construction of the HMLC. The planning process for R&R, and use of the gardens for construction, would need to consider and take into account the proposals for the HMLC if they were imminent or during the process of construction themselves, and to consider matters such as the wider impact on users of VTG of the construction activities going forward. There are established stages and processes through which these matters can and will be considered, including on any redetermination of

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			the planning application for the HMLC if proposals for the R&R work are more choate at that time. If there are particular concerns that people wish to raise as to the impacts of those works possibly coming forward at the same time, those are things that could be raised before, and that would have to be considered by the Minister in redetermining the planning application for the proposed HMLC. The corporate officers of the House of Lords and the House of Commons have been invited by the MHCLG Planning Casework Unit (on behalf of the Minister responsible for redetermining the HMLC planning application) to make representations in relation to the planning application, and those corporate officers have confirmed that they intend to make representations before the application is redetermined (see letter at Annexe 4). It will be seen that the letter from the corporate officers refers to rule 19 of the Town and Country Planning (Inquiries Procedure) (England) Rules 2000. This provides that where a called-in ministerial planning decision in respect of which an inquiry has been held is quashed in subsequent court proceedings (as is the case here), the Secretary of State must: (a) send those persons who appeared at the inquiry a written statement of the matters with respect to which further representations are invited for the purposes of his further consideration of the application; and (b) allow them to make written representations to him in respect of those matters or to ask for the inquiry to be re-opened. Rule 19 then also allows the Secretary of State to cause the inquiry to be re-opened (by the same or a different inspector), whether in response to such representations or of his own motion.
Recommendations suggested			
The authorities responsible for Restoration & Renewal, the repair of Victoria Tower and the replacement of the Education Centre should report	B Deech	PET-015 para. 25	The recommendation by Baroness Deech is not accepted by the Promoter. The Promoter has substantively addressed this issue above, in response to the amendment sought to similar effect, and would just wish in addition to clarify that there is no new request for planning

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jointly on how these undertakings and any Memorial and Learning Centre in VTG would impact on each other, and lay that report before Parliament before planning permission is sought.			permission, rather the position is that the application for the planning permission which was quashed by the High Court remains extant and is now awaiting redetermination. The Promoter also refers to the Committee's note to the Promoter, <i>Undertakings, Recommendations and Assurances</i>, received on 06 December 2024, to which the Promoter has responded in Annexe 3, paragraph 15 of which relates to the Committee's proposed Recommendation on this and related issues.
Design parameters / limits			
Information requested			
Distance between Buxton Memorial and new railings and seats to be implemented as part of the HMLC project	Committee	COM-211 paras. 183 and 184	It should be noted that the minimum distance between the Buxton Memorial (BM) and the bench facing the BM will be 2.208 metres, and the minimum distance between the Buxton Memorial and the fencing of the HM Courtyard will be 2.426m: not the 1.5 metres suggested by Mr Buxton in his evidence (see COM-211 paras. 114 and 115). A drawing showing the relevant measurements is provided at Annexe 5. Visitors simply walking past the BM at that point will typically be using the 5m path alongside (measurement A on the drawing) and will not be impeded by people seated on the benches, or viewing the Buxton Memorial or the HMLC from the circular path. The Promoter also refers to the Committee's note to the Promoter, <i>Undertakings, Recommendations and Assurances</i>, received on 06 December 2024, to which the Promoter has responded in Annexe 3, paragraph 8 of which relates to the Committee's requested assurance on this issue.
Amendments proposed			
At end of clause 2 add: “provided that any such memorial and centre for learning constructed on the land so described shall not (i) result in the raising of the current ground level	B Doctor KC group of petitioners Supersedes the amendments proposed by the	PET-014 item 3	The fundamental issue with this proposed amendment – and all others like it (see, for example, the proposed amendments above which seek to restrict the footprint of the HMLC to 1,429 square metres and the other proposed restrictions below) which seek to restrict the scale, size or other physical proportions or design of the HMLC - is that it would have the effect of preventing the proposed HMLC (which is the subject

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or (ii) exceed 9.62m metres in height above current ground level.”	London Historic Parks and Gardens Trust ('Amendment A') and the Thorney Island Society		of the re-activated planning application process) from being constructed at all. This is made plain in the 'supplementary witness statement' of Dr Gerhold (PET-016) which states (in relevant part) that: <i>“Given the contents of the Bill and the Committee’s ruling, amendments relating to the size and design of an HMLC in Victoria Tower Gardens must be within scope even if they would prevent the current design being constructed.”</i> Aside from the fact that this passage veers into legal submissions rather than constituting evidence, it makes abundantly clear that the very purpose of these types of proposed amendments is with a view to achieving petitioners’ underlying substantive aim of frustrating the construction and operation of the proposed HMLC in VTG. This runs completely counter to the principle of clause 2 of the Bill, which is precisely intended to enable such activities to proceed should planning permission be granted in due course.
Clause 2, add: “provided that any such activities shall preserve [or enhance] any other memorial or the setting of such memorial in the land described in section 8(1) of that Act”	B Doctor KC group of petitioners Supersedes the amendments proposed by the London Historic Parks and Gardens Trust ('Amendment D'), the Buxton Society and the Thorney Island Society	PET-014 item 9	In headline terms, what the Committee is being asked to do is to recommend an amendment to the Bill that would destroy its principle and go to the very heart of what the Bill is intended to do. The purpose of this amendment would be, as Mr Buxton acknowledged in evidence in response to a question from Baroness Scott, precisely “<i>to tie the hands of the [planning] decision-maker</i>” (COM-211 paras. 144 and 145). It would stop the current proposal for the HMLC in its tracks. At the moment, that is the only proposal that there is for an HMLC in VTG. In the case of an amendment that requires there to be no harm to the Buxton Memorial in circumstances where harm has been found by the planning decisions taken to date (albeit outweighed by the public benefits of the project), it necessarily follows that the effect of such an amendment would be that, on the basis of the assessment that has currently been made of the proposals, the proposed HMLC could not go ahead. In response to Lord Jamieson’s direct question that “<i>the amendment you are proposing would stop the Holocaust memorial</i>”, Mr

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			Buxton plainly admitted <i>“that would be the effect of this amendment”</i> (COM-211 paras. 131 to 139). Further, this amendment would afford a level of legislative protection to the Buxton Memorial (or other memorials in the VTG) above and beyond that which they enjoy as listed buildings under legislation and policy more generally, in that they would provide that if any harm were to be caused to the Buxton Memorial (or other memorial) the provision of the HMLC would not be able to go ahead, rather than that harm being weighed against the public benefits of the project in the usual way. It remains the Promoter’s submission that there is no justification for making the disapplication of s.8(1) and (8) of the 1900 Act (the purpose of which is to require the gardens to be maintained as a garden for the benefit of the public, not for the protection of the existing memorials) dependent upon or subject to a more stringent regime in relation to those memorials than applies generally to such structures. Moreover, on the evidence provided by petitioners, the Committee is not in a position to be able to speculate as to whether there is any putative alternative design of a memorial and learning centre which could be introduced into this heritage-rich garden with a number of memorials - and the setting of memorials - in such a way that absolutely no harm whatsoever was done to the setting of any of those memorials. It is entirely speculative. See also generally COM-209 paras. 448 and 449 and COM-211 paras. 172 to 174
Clause 2, add: “provided that the no part of the memorial and centre for learning (including any surrounding fencing) shall be located less than 8m from the Buxton Memorial”	B Doctor KC group of petitioners	PET-014 item 10	Petitioners are in effect asking the Committee to decide what, in its judgement, is the appropriate separation distance between the HMLC and the Buxton Memorial. No evidence has been provided to inform the Committee in making that judgement and it would not be an appropriate amendment to be included, or recommended for inclusion. This is because, as the Committee has already indicated, it is not sitting as a planning committee, or as a planning decision-maker, and this is the quintessential sort of judgement that is left to the planning process

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			and will – in due course – be the subject of the re-activated planning application process. As noted above, the shortest distance from the Buxton Memorial to the new railings on the east side of the courtyard is 2.426 metres. The amendment also does not take account of the fact that the below-ground element of the proposed HMLC will also be in close proximity. In these circumstances, the practical effect of this amendment would be to prevent the proposed HMLC from being implemented if planning permission is granted.
At the Committee's hearing held on 5 December 2024, Lord Sassoon maintained his request for the Bill to be amended so as to require that: - the HMLC not to encroach onto the lawn in VTG; - views of the south front of the Palace of Westminster be preserved; and - the HMLC be moved to the periphery of VTG. No draft text for these suggested amendments has been provided.	Lord Sassoon	Transcript not yet available	As Ms Lean submitted on behalf of the Promoter on 5 December 2024, all of these proposed amendments are of a similar nature to those put forward by other petitioners concerning, e.g. limiting the size or height or bulk of the HMLC or specifying distances from other memorials or seeking to require the preservation (in terms of the absence of any heritage harm) of the setting of other features in or near VTG. As set out above, this once again runs up against the principle of clause 2 which is about not restricting or preventing the implementation of the proposed HMLC. This is because the amendments sought would necessarily have the effect of (inter alia) 'restricting' the provision the HMLC in the VTG and would prevent the current proposed HMLC from proceeding at all.
Any Learning Centre built pursuant to this Act should include the educational facilities recommended in the Prime Minister's 2015 Holocaust Commission, including a physical campus, an online hub, a lecture theatre, classrooms and offices.	B Doctor KC group of petitioners	PET-014 item 12	This amendment seeks to impose a requirement on the facilities which the Learning Centre will provide that would have the effect of preventing the proposed HMLC being built at Victoria Tower Gardens. The Learning Centre was discussed in detail at the planning inquiry. The Planning Inspector accepted the Promoter's case that nearly all the Holocaust Commission's recommendations on holocaust educational facilities could be met at Victoria Tower Gardens, with the one exception being the ability to host offices for other Holocaust-related organisations. The Inspector agreed with the Promoter that the growth

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			in the use of digital communications, particularly following the coronavirus pandemic, meant that physical offices were much less important (paragraph 15.142).
Bill should stipulate that if the Memorial is sited in the VTG the 'centre for learning' should be sited elsewhere. Following the Committee's provisional ruling that this is out of scope, the proposal was amended orally to argue that the learning centre should be in the parliamentary education building instead.	Thorney Island Society	COM-209 para. 88	The amended proposed amendment would still be in contravention of the Committee's provisional ruling on scope, for two reasons: 1. it would mean that the memorial and the learning centre are not in truth co-located; and 2. it seeks to prevent or restrict the construction of the learning centre below ground. In addition, the petitioners have also not explained how the proposal to use the education centre squares with the prospective loss of the centre during the R & R works (see Lord Vaux's evidence at COM-210 para. 84).
Recommendations suggested			
There should be a new competition to design an appropriate and moderate sized Memorial, if it is to be situated in VTG.	B Deech	PET-015 para. 26	This proposed recommendation would be contrary to the principle of the Bill which is to enable the proposed HMLC to be built at Victoria Tower Gardens and is in breach of the Committee's rulings on scope. The proposed scheme was chosen following an international design competition that attracted nearly 100 entries. The public was invited to comment on ten shortlisted designs which were exhibited publicly around the country and in the Palace of Westminster. The winning design was selected by a broad-based panel who were unanimous in their decision that the design met an essential challenge of the brief by being visually arresting yet showing sensitivity to its location and context.
Governance arrangements			
Information requested			

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The Chair requested further particulars of both the current governance arrangements for VTG, together with the current proposals for management of the HMLC and the remainder of VTG in the future. This has been supplemented by the Chair's request made at the hearing on 5 December 2024 for the Promoter to provide a draft assurance in relation to the future management of VTG.	Committee	COM-209 paras. 190 to 200 and 214 to 217	In terms of the current arrangements, VTG is Crown land for which the Secretary of State for Culture, Media and Sport is responsible. The Royal Parks charity currently manages VTG on behalf of the Secretary of State under its overall contract to maintain London's Royal Parks and other plots of land, including VTG, which do not have Royal Park status. Looking to the future, the Prime Minister's Holocaust Commission proposed that a permanent, independent body should be established to operate and run the HMLC. Decisions on the precise form and function of this operating body have not yet been taken, but there are no plans for it to take on wider responsibility for the management and maintenance of VTG. Please refer to PRO-011 for further detail. The Promoter would further stress, in that regard, that those parts of the VTG in respect of which s.8(1) and (8) would not be disapplied by clause 2 of the Bill (which will, in practice, be determined by any planning permission which may be granted for the HMLC) would remain, such that the Secretary of State for Culture, Media and Sport (and/or any body to which she delegated responsibility for management of the garden) would remain subject to the obligation to maintain those parts of VTG as a garden under s.8 of the 1900 Act. The Promoter also refers to the Committee's note to the Promoter, <i>Undertakings, Recommendations and Assurances</i>, received on 06 December 2024, to which the Promoter has responded in Annexe 3, paragraph 14 of which relates to the Committee's requested undertaking on this issue.
Amendments proposed			
Clause 2, add new sub-clause: "The body responsible for the operation of any memorial and centre for learning constructed on the land so described shall not have authority over the parts of Victoria Tower	B Doctor KC group of petitioners Supersedes the amendments proposed by the London Historic	PET-014 item 5	As set out above, there are no plans for the body established to operate and run the HMLC to take on wider responsibility for the management of VTG. However, it should be noted that the effect of this type of amendment could also have the inadvertent effect of preventing a situation in which

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Gardens not occupied by that memorial and centre for learning."	Parks and Gardens Trust ('Amendment H') and the Thorney Island Society		the management and operation of both VTG and the HMLC remained within the direct control of government in the future. Further, and as noted above, those parts of the VTG in respect of which s.8(1) and (8) would not be disapplied by clause 2 of the Bill (which will, in practice, be determined by any planning permission which may be granted for the HMLC) would remain, such that government (or any body to which responsibility for management of the gardens was delegated) would remain subject to the obligations under s.8 of the 1900 Act.
Clause 2, add new sub-clause: "The body responsible for the operation of any memorial and centre for learning constructed on the land so described shall not have authority over the parts of Victoria Tower Gardens not occupied by that memorial and centre for learning. Any body responsible for Victoria Tower Gardens shall consult in advance with local residents through the relevant local amenity societies with regard to any matters which may affect the free use of Victoria Tower Gardens as a garden open to the public."	Thorney Island Society	PET-018	The first sentence of this proposed amendment suffers from the same defects as the preceding one advanced on behalf of this petitioner (and others) by Mr Doctor. This proposed amendment also seeks to add a completely new restriction / requirement relating to the management of VTG which does not at present exist. The proposal to introduce a new general restriction across the whole of VTG would constitute an amendment to s.8 of the 1900 Act to write in a new restriction which does not exist currently. Further, such an amendment would also constitute an extension of the scope of the Bill itself, which would require an 'additional provision'. Additional provisions may not, however, be obtained in the Second House. See generally Erskine May para. 45.22.
Recommendations suggested			
The Government should present for the approval of Parliament a report setting out the remit of the body running the Memorial and the manner in which it will interact with the separate body managing the gardens which will have responsibility for protecting the interests of park users	Thorney Island Society	COM-209 paras. 130	As set out above and in PRO-011, no decisions have yet been taken on the form or function of the Memorial and Learning Centre's operating body. The Promoter fully recognises the importance of close co-operation between the body responsible for operating the HMLC and the body responsible for managing the wider VTG. The Promoter and the Secretary of State for Culture, Media and Sport will seek to ensure that the two bodies (whatever their form and function)

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other than Holocaust Memorial visitors			co-operate within a framework which enables each to pursue their distinct objectives unimpeded.
Visitor management strategy			
<i>Information requested</i>			
In an email from the clerks to the Promoter of 29 November 2024, the Committee expressed a wish for further information from the Promoter in relation to how, under current plans, the flow of people visiting the HMLC would be managed after it has been built, including which entrance to VTG visitors would use and how that would be enforced.	Committee	No reference	A copy of the Visitor Management Strategy (VMS) prepared as part of the planning application is provided Annexes 1 and 2 of this table. The VMS, which is based on surveys of pedestrian numbers in VTG and modelling of the expected numbers of visitors to the HMLC, addresses the topics of entry to VTG, movement around the gardens and access to the HMLC itself. The strategy explains (Annexe 1 pg.11 section 3.2) the expectation that, because of the linear shape of VTG, most visitors will enter from the north and south entrances to the gardens, with the majority arriving at the circular entrance space facing the Emmeline Pankhurst Memorial. All the current entrances to VTG will however remain open and accessible to visitors, whether intending to visit the HMLC or visiting VTG for any other purpose. In summary, the strategy concludes: (a) even with high demand, small party sizes (which take longer to process), and at the busiest times during the day, it is possible to comfortably manage the HMLC entrance and keep queue lengths to a minimum, and in the majority of cases with no queues forming at all (Annexe 1 pg. 21 section 5.9); and (b) with a predicted 3,000 visitors per day entering the HMLC and 7,000 additional visitors to VTG to view (but not enter) the HMLC there are no issues with pedestrian flow at the entrances to the gardens, the entrance to the Entrance Pavilion, or with the capacity of the gardens in terms of crowding (Annexe 1 pg.27 section 7.1).

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			The Planning Inspector's conclusions in respect of these matters can be found at various points in his report, particularly paragraphs 15.194 (current usage of VTG), 15.206 (expected future visitor numbers), 15.210 to 15.212 (impact on users of the gardens of additional visitors), 15.244 (security implications) and 15.254 to 15.258 (pedestrian movements alongside VTG). The Promoter also refers to the Committee's note to the Promoter, <i>Undertakings, Recommendations and Assurances</i>, received on 06 December 2024, to which the Promoter has responded in Annexe 3, paragraphs 2 and 4 of which relate to the Committee's requested assurances on these and related issues.
Amendments proposed			
None			
Recommendations suggested			
None			
Playground			
Information requested			
The Committee requested further information on the Promoter's intentions in respect of maintaining access to Horseferry Playground during construction and operation of the HMLC, in particular the provision of step-free access, having regard to (amongst others) the needs of parents with children in pushchairs, and the management of queuing.	Committee	COM-209 paras. 148 to 152	The Promoter's overarching intention is to keep the playground open for as long as reasonably practicable during the construction of the HMLC. However, it is inevitable that closure of the playground will be needed at certain stages of the construction programme, both to enable works to take place on the site of the playground and to ensure the safety of users of the playground when works take place nearby. Following completion of construction of the planned HMLC and all the associated landscaping improvements at VTG, level, 'step free', access to the playground will be available through the gate on Millbank at the southern end of VTG (as now), as well as from the other gates into VTG.

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			The playground will also be accessible via the steps from Lambeth Bridge. Please refer to PRO-011 and Annexes 1 and 2 of this table for further details. The Promoter also refers to the Committee's note to the Promoter, <i>Undertakings, Recommendations and Assurances</i>, received on 06 December 2024, to which the Promoter has responded in Annexe 3, paragraphs 1, 2, 4 and 5 of which relate to the Committee's requested assurances on these and related issues.
Amendments proposed			
At end of clause 2 add: "provided that any such memorial and centre for learning constructed on the land so described (i) shall not cause the existing Spicer Memorial to be moved or the area of the playground on that site to be reduced; and (ii) shall be designed and operated in such a way that access to any children's playground on that site is maintained at level from the nearest entrance without requiring the use of steps."	B Doctor KC group of petitioners Supersedes the amendments proposed by the London Historic Parks and Gardens Trust ('Amendment E') and the Thorney Island Society	PET-014 item 4	As explained by Mr Katkowski KC (COM-209 para. 146), this proposed amendment would stop the proposed HMLC in its tracks because the proposed design does change the children's playground in certain ways, and they would be located adjacent to one another. The substantive effect of the amendment in this regard would accordingly attack the principle of the Bill by creating an obstacle to the implementation of the proposed HMLC. In any event, this matter was already considered by the appointed planning inspector and will be considered again through the reactivated planning process in due course. With respect to the issue of level access, please see above.
Recommendations suggested			
None			
VTG access			
Information requested			

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The Committee sought further information on the Promoter's intentions in respect of the extent to which access to VTG would be maintained during construction of the HMLC.	Committee	COM-209 paras. 174 to 176	As explained in the draft assurance proffered to the select committee on the Bill in the other place, the Promoter will ensure, as far as reasonably practicable and health and safety considerations allow but excepting factors beyond the Promoter's control (such as adverse weather conditions), that restrictions on access by the public to VTG during construction will be kept to a minimum and that, in particular, the Promoter will keep a footpath along the river Thames open during the construction period whenever reasonably practicable. Please refer to PRO-011 for further details. The Promoter also refers to the Committee's note to the Promoter, <i>Undertakings, Recommendations and Assurances</i>, received on 06 December 2024, to which the Promoter has responded in Annexe 3, paragraph 6 of which relates to the Committee's requested assurance on this issue.
Amendments proposed			
Clause 2, add new sub-clause: "After the opening of any memorial and centre for learning constructed on the land so described, Victoria Tower Gardens shall not be closed for more than three days per year for Holocaust commemoration."	B Doctor KC group of petitioners Supersedes the amendments proposed by the London Historic Parks and Gardens Trust ('Amendment G') and the Thorney Island Society	PET-014 item 6	No decisions have been taken on future closures of the entirety of VTG to facilitate Holocaust-related commemoration events once the HMLC has been built, or the extent to which VTG would need to be closed for any other purpose associated with the HMLC. It should be noted that there are currently no restrictions on the number of days that VTG can be closed to the public, whether in the London County Council (Improvements) Act 1900, or otherwise. See also the discussion at COM-209 paras. 158 to 164 In any event, the proposal to introduce a new general restriction across the whole of VTG constitutes a wholesale amendment of the 1900 Act. As described above in more detail, it is well established that an amendment which would have the effect of extending the scope of the Bill in this manner may only be achieved through an 'additional provision', but these may not be obtained in the Second House. See generally Erskine May para. 45.22

Theme	Raised by	Doc ref	Promoter comment
			The Promoter also refers to the Committee's note to the Promoter, <i>Undertakings, Recommendations and Assurances</i> , received on 06 December 2024, to which the Promoter has responded in Annexe 3, paragraphs 10 and 11 of which relate to the Committee's proposed Recommendations on this and related issues.
Amendment F – preservation of free access to the public park with unimpeded passage or surveillance Insert in clause 2 “In any part of the 1900 land not occupied by the construction, public access shall not be impeded by security checks or ticketing”	London Historic Parks and Gardens Trust	PET-007 slide 15	As shown on the plan submitted by the Promoter (PRO-010), the vast majority of VTG post-construction will remain publicly accessible without charge as now. No security checks are proposed in relation to the area tinted yellow which is 'unticketed'. The Promoter also refers to the Committee's note to the Promoter, <i>Undertakings, Recommendations and Assurances</i> , received on 06 December 2024, to which the Promoter has responded in Annexe 3, paragraph 9 of which relates to the Committee's requested undertaking on this issue.
Recommendations suggested			
None			
Retail sales and reprovision of kiosk			
Information requested			
The Committee requested further information regarding the operation and management of the existing and proposed refreshment kiosk.	Committee	COM-210 paras. 171 to 183	The general intention is to provide a refreshments kiosk that will be available for all users of VTG including visitors to the playground and to the HMLC. A refreshment kiosk is currently in place in VTG. This was consented as part of the planning application to extend the playground which was granted planning permission by Westminster City Council in 2014 (ref: 13/10417/FULL). The kiosk was previously operated under a franchise issued by The Royal Parks. The existing kiosk closed in the autumn of 2019 and reopened for the summer season in 2021, before closing again in September 2021. Throughout the design process, an important aim of the HMLC programme has been to enable all current activities in VTG to continue

Theme	Raised by	Doc ref	Promoter comment
			after construction of the HMLC. Re-provision of the refreshments kiosk has been proposed in that light. Questions were raised at the planning inquiry by the Thorney Island Society as to whether users of the 'café' would overcrowd the playground. The Inspector addressed this in the context of wider conclusions on the impact on VTG at paragraph 15.210 of his report. Baroness Deech and other petitioners raised questions about the propriety of having a refreshments kiosk close to the HMLC or in VTG generally. There are refreshments facilities provided at or near other memorials, including: cafeterias at Yad Vashem, and at the US Holocaust Memorial Museum; a tearoom at the National Holocaust Centre and Museum in Nottinghamshire; and the Serpentine Bar & Kitchen is reasonably close to the Memorial in Hyde Park. It should also be noted that the new structure accommodating the replacement refreshment kiosk will be required in any event to accommodate bike racks and plant. The Promoter also refers to the Committee's note to the Promoter, <i>Undertakings, Recommendations and Assurances</i>, received on 06 December 2024, to which the Promoter has responded in Annexe 3, paragraph 3 of which relates to the Committee's proposed Recommendation on this issue.
Amendments proposed			
Clause 2, add new sub-clause: "After the opening of any memorial and centre for learning constructed on the land so described, no consumer items, including food or drink or souvenirs, may be sold in Victoria Tower Gardens."	B Doctor KC group of petitioners	PET-014 item 8	The proposal to introduce a new general restriction across the whole of VTG constitutes a wholesale amendment of the 1900 Act. As described above in more detail, it is well established that an amendment which would have the effect of extending the scope of the Bill in this manner may only be achieved through an 'additional provision', but these may not be obtained in the Second House. See generally Erskine May para. 45.22

Theme	Raised by	Doc ref	Promoter comment
			There are already restrictions on trading in VTG which are contained in regulation 4 of The Royal Parks and Other Open Spaces Regulations 1997 (these apply, inter alia, to VTG: see Schedule 1 para 20). Regulation 4(6) provides that without the written permission of the Secretary of State, no person shall ... (6) carry on any trade or business in a Park, offer anything for sale or hire or expose or have in his possession anything for the purpose of sale or hire therein. There are similar restrictions on organising or taking part in any assembly, &c., in regulation 4(17). Please see also the submissions of Ms Lean at COM-210 paras. 171 to 183
Recommendations suggested			
None			
Security			
Information requested			
The Committee requested that Lord Carlile provide a draft amendment relating to security matters.	Committee	COM-208 para. 258	A draft amendment has been provided by Lord Carlile – please see below for the Promoter’s comments thereon. The Promoter also refers to the Committee’s note to the Promoter, <i>Undertakings, Recommendations and Assurances</i>, received on 06 December 2024, to which the Promoter has responded in Annexe 3, paragraphs 12 and 13 of which relate, respectively, to the Committee’s requested undertaking and proposed Recommendation on security matters.
Amendments proposed			
After Clause 2, insert New Clause –	Carlile	PET-011	As a preliminary point, an amendment along the lines proposed by Lord Carlile would make security issues a condition precedent to the Act

Theme	Raised by	Doc ref	Promoter comment
(1) Within three months of the passing of this Act the Secretary of State will provide a report to both Houses of Parliament setting out the effects arising from the construction, presence and use of the Holocaust Memorial and Learning Centre on the chosen site. Such report shall include: (a) A list of those bodies and individuals consulted (subject to redaction of names where necessitated by national security); (b) A summary of the advice provided by each body and individual consulted; (c) A full description with visual depictions of all road and traffic changes, at and near to the chosen site, proposed to be made during construction and following completion of the Memorial and Learning Centre; (d) Proposals for the continuing assessment of the security of the site and nearby buildings. (e) Such other security information as the Secretary of State considers to be relevant. (2) The Secretary of State may delegate the preparation of the report referred to in subsection 1 of this section to the Independent Reviewer of Terrorism Legislation.			coming into force, which effectively goes against the principle of the Bill already approved at second reading. Security has been a major consideration throughout the development of the design for the Holocaust Memorial and Learning Centre. Proposals for physical and operational security arrangements have been developed in line with the best available expert advice, and those arrangements will be continually reviewed and updated in line with the assessment of threats. Wherever it is located, the HMLC will require a full range of security measures. Locating the HMLC in Victoria Tower Gardens will allow it to benefit from the existing enhanced security arrangements within the Government Security Zone (GSZ) and the availability of rapid response resources in the vicinity of the Palace of Westminster. The independent planning inspector addressed security matters in his April 2021 report (paragraphs 15.234 – 15.253), which contains a summary of the main security measures proposed for the HMLC and the inspector's conclusions on this matter. As the Committee is aware, the planning application must be re-determined. As part of the planning application security information was submitted and made available to the counterterrorism and crime reduction teams supporting Westminster City Council (WCC). As a result, neither WCC, nor its advisers, have objected to this aspect of the proposal. It is also not readily apparent why sub-paragraph (c) of the proposed amendment requires particulars of “<i>all road and traffic changes</i>” to be included in the report, even if these have nothing to do with the HMLC, or would happen anyway, and over which the Promoter has no control and with no limit of time, i.e. long term proposals which could be years or decades away in the future would be caught by this requirement which the Promoter suggests is disproportionate and unreasonable. Without prejudice to the above, matters of security on the proposed site were carefully considered during the independent Inspector's

Theme	Raised by	Doc ref	Promoter comment
(3) Prior to this Act coming into force the Secretary of State shall obtain a resolution from both Houses of Parliament approving the bringing of the Act into force following the report referred to in this section. In Clause 3(2) – Line 21 After ‘beginning’ delete ‘with the day on which this Act is passed’ and insert: ‘with the day on which both resolutions described in section 3 of this Act have been passed’.			assessment of the project during and following the public inquiry, and are addressed at length in the Inspector’s report. The report notes in particular (paragraph 6.107) that: <i>“There are no guarantees against terrorism or extremist activity, and designers design to achieve a balance between the intended use of a site and the safety and security that make the use of the site viable in an everyday context. For the UKHMLC, the potential security risks were assessed along with the likelihood of these events occurring, and proportional and appropriate mitigations and management procedures were then designed in. A full set of security design information was submitted to WCC as part of the planning process, though for obvious reasons was not included in the public part of the planning information.”</i> The Inspector also drew attention (at paragraph 8.58) to the fact that: <i>“WCC [i.e. Westminster City Council as local planning authority] does not object to the development on the basis of security concerns. In reaching this decision, WCC consulted the Metropolitan Police Service Designing Out Crime team, who raised no objection. However, the nature of the security arrangements proposed, including the presence of uniformed security personnel, would result in an adverse impact on the tranquillity of VTG, in conflict with Policy S35 of the WCP.”</i> Security considerations are then dealt with specifically, and in detail, in paragraphs 15.234 to 15.253 of the report. This section goes into detail surrounding why the alternative sites proposed by opponents – such as at the Imperial War Museum – have the same security implications as the current site. The Inspector notes that regardless of where the HMLC is situated, there will be significant security implications to be considered, and specifically drew attention to the fact that whilst opponents argued that alternative sites would face less threat from terrorism, no evidence was put forward to support such a claim.

Theme	Raised by	Doc ref	Promoter comment
			By comparison, the proposed site at VTG has an already established security infrastructure that can be utilised, with paragraph 15.234 also noting that: <i>“The main parties have agreed that the proposed internal and external security measures, and the security arrangements for public access to the UKHMLC, are to be secured by the s106 agreement.”</i> Questions of security were therefore given serious and detailed consideration by the Inspector when undertaking his assessment of the proposed HMLC and recommending that planning permission be granted. Nevertheless, parties with an interest in the security arrangements, including the Palace of Westminster, will have formal opportunities to comment further on the planning application and to propose any conditions to the Minister responsible for the planning decision. As noted above, the Palace of Westminster has already engaged with the process for re-taking the planning decision in correspondence with the planning casework unit. A copy of this correspondence is provided at Annexe 4. The proposed amendment is therefore squarely concerned with matters which properly fall to be dealt with as part of the ordinary planning process, and which have already been the subject of significant detailed consideration by WCC (the local planning authority) and the independent planning inspector who both concluded that security considerations were neutral in character and did not indicate that the refusal of the planning permission required to enable the HMLC to proceed was justified on this basis. Moreover, extensive references have been made by petitioners to the programme of restoration and renewal (“R&R”) of the Palace of Westminster throughout the hearings to date. R&R is the subject of specific legislation in the Parliamentary Buildings (Restoration and Renewal) Act 2019 which does not treat security in any special way notwithstanding the direct relationship to the sensitive parliamentary estate. Section 2(5) of the 2019 Act obliges the sponsor body for R&R, in carrying out its functions, to have regard to safety and security issues.

Theme	Raised by	Doc ref	Promoter comment
			This demonstrates that Parliament thought about safety and security matters when considering the bill relating to R&R, but did not consider it necessary to make special provision supplementing, or replacing, the normal planning process. The Promoter considers that there is no reason why this kind of more onerous supplementary provision should now be made in relation to the HMLC, noting once more that the Bill does not in itself authorise or grant consent or planning permission for the construction, operation or use of the HMLC – clause 2 is concerned solely with the relaxation of the restriction in section 8 of the 1900 Act which would otherwise prevent the implementation of the project should planning permission be granted once the reactivated planning process is finally determined. The inclusion of the amendment proposed by Lord Carlile would also extend the scope of the Bill by introducing a completely new restriction / requirement. This would require an additional provision which cannot be incorporated in the Second House (see above).
Recommendations suggested			
The Government should report on the security ... aspects of the project before presenting any application for planning permission.	B Deech This also supersedes the equivalent recommendation proposed by the Thorney Island Society for such a report to be provided.	PET-015 para. 27	The principal issue with this proposed recommendation is that (by requiring steps to be taken before a planning application is presented) it requires implicitly that the currently proposed HMLC (which is the subject of the reactivated planning process on an existing planning application) be abandoned. To this extent it clearly runs counter to the principle of the Bill. Moreover, the issues identified above in relation to the amendment proposed by Lord Carlile on this topic also apply: security was not treated in any special way in the legislation relating to R&R, being left to the ordinary planning process, and there is no reason why this more onerous, enhanced scrutiny is warranted or appropriate in relation to the HMLC. Such matters have been the subject of extensive consideration and evaluation as part of the planning process to date, and (irrespective of the Committee's proposed undertaking, which the Promoter has indicated it is content to give) will be the subject of further consideration

Theme	Raised by	Doc ref	Promoter comment
			and evaluation as part of the reactivated planning process in due course. The Promoter repeats its submission that this is the most appropriate and proper mechanism for such matters to be raised, considered, assessed and resolved.
There should be an impact assessment before the Bill completes its stages and a risk assessment before planning permission is sought.	B Deech	PET-015 para. 28	Please see above in response to Baroness Deech's proposed recommendation as to a report being made on security matters.
Costs			
<i>Information requested</i>			
None			
<i>Amendments proposed</i>			
None			
<i>Recommendations suggested</i>			
The Government should present for the approval of Parliament a report on the capital and operating costs of the project and the financial sustainability of the entity which will execute the project and operate it, before presenting any new or amended proposal for planning permission	Thorney Society	Island No reference	As stated by the Committee Chair and Baroness Scott, cost is not a matter which falls within the private and local interests aspects of the Bill with which the Committee is concerned (COM-209 paras. 121 to 130). The Promoter concurs in this analysis (para. 212) and understands that the petitioner does not take this proposed recommendation further (para. 130). Moreover, as accepted in evidence by Lord Strathclyde (COM-211 paras. 262 to 273), to the extent that this is a matter of potential concern, this is a matter for the House to raise later in the Bill's passage.
The Government should report on the ... costs aspects of the project before presenting any application for planning permission.	B Deech	PET-015 para. 27	See above

ANNEXE 1: VISITOR MANAGEMENT STRATEGY

**United Kingdom Holocaust Memorial
and Learning Centre**

Visitor Management Strategy
December 2018

The Secretary of State for Housing Communities and Local Government

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1. Introduction

The purpose of the Visitor Management Strategy is to set out the guiding principles for the operation of the Holocaust Memorial and Learning Centre and to demonstrate the management philosophy which would be adopted by the Operator.

The Holocaust Memorial and Learning Centre will be co-located in Victoria Tower Gardens, and will be constructed and managed by UK Holocaust Memorial Ltd, a non-departmental public body (NDPB) wholly owned by the Ministry of Housing Communities and Local Government (MHCLG).

Currently, Victoria Tower Gardens is managed by The Royal Parks, in line with a licence and management agreement from the Department for Digital, Culture, Media and Sports (DCMS). It is proposed that the Holocaust Memorial Ltd will lease the area outlined as the footprint of the Memorial and Learning Centre from DCMS and this area will therefore be excluded from the area directly managed by The Royal Parks.

The Visitor Management Strategy covers the following topics:

- Section 2.0 – Site Description;
- Section 3.0 – Summary of Proposed Development;
- Section 4.0 – Key Assumptions;
- Section 5.0 - Ticketing Strategy;
- Section 6.0 – Operational Management; and
- Section 7.0 – Visitor Flow and Gardens Capacity.

This document has been prepared by MHCLG and draws together information provided by the following Consultants:

- Adjaye Associates (Sections 2 and 3)
- Atkins (Section 2)
- Langdale Ticketing (Section 5 and Appendices)
- WSP (Section 7)

2. Site Description

Victoria Tower Gardens forms an elongated triangular space placed on a North – South axis with the Houses of Parliament. Both long sides of the Gardens are lined with a row of majestic London Plane trees. These frame views to the Thames on the east side and screen the presence of buildings and the road on Millbank on the west side.

The site includes the Horseferry Playground located in the southern part of the Gardens, providing play space and equipment for children, including features such as sandpit, water play and dance chimes. The memorial sculptures of Burghers of Calais by Auguste Rodin, Emmeline Pankhurst's Statue and the Buxton Memorial Fountain create focal points for contemplation within the park space.

2.1. Location and Boundaries

The Gardens are bounded by Abingdon Street and Millbank to the west, the Thames to the east, Lambeth Bridge to the south, and Black Rod's Garden with the Houses of Parliament to the north. The entrance to Black Rod's Garden from Abingdon Street lies immediately north of the Gardens, and is marked by a small octagonal lodge with iron gates. The boundaries to the west and north are marked by iron railings, to the south by the retaining wall of Lambeth Bridge, and to the east by the granite embankment wall.

2.2. Entrances and Approaches

The Gardens are entered from four gateways along the west side.

- (1) The northernmost entrance leads from Abingdon Street and is the most used entrance due to its proximity to Parliament Square and Westminster tube station.
- (2) & (3) The middle two entrances are opposite to Great Peter Street and Dean Stanley Street.
- (4) The southernmost entrance on the west side is located halfway between Dean Stanley Street and the roundabout.
- (5) A fifth entrance is from Lambeth Bridge to the south of the site; the park entrance gate is located on the bridge, beside an obelisk, and to the north of the gate a flight of steps leads down to the gardens.

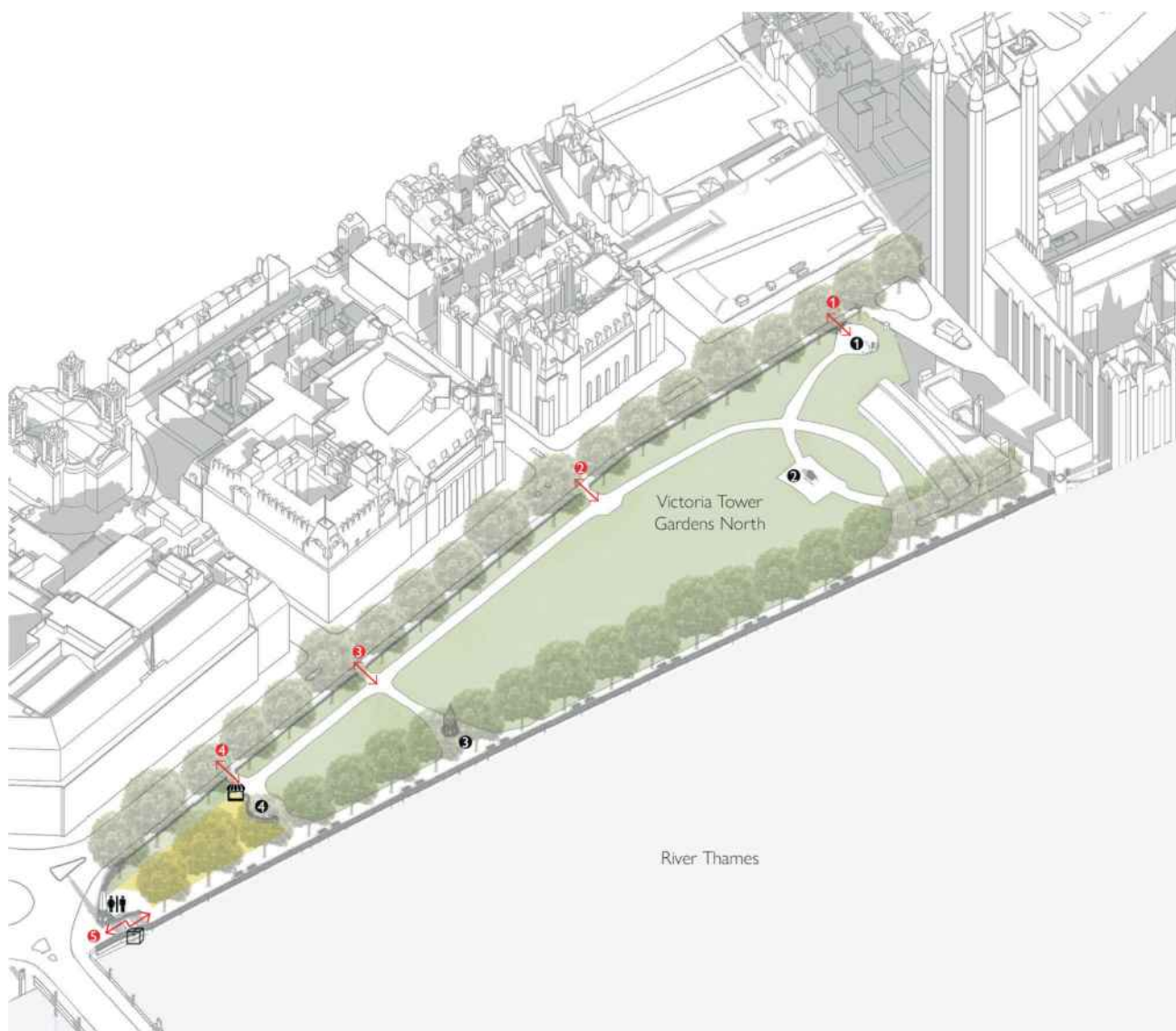


Diagram showing existing conditions of Victoria Tower Gardens

- KEY
- Victoria Tower Gardens North
 - Green Space
 - Horseferry Playground
 - Pedestrian Flow
 - Access Points to site
 - Entrance Number
 - Cafe Kiosk
 - Toilet
 - Royal's store and office
- Memorials
- 1 Emmeline Pankhurst Memorial
 - 2 Burghers of Calais
 - 3 The Buxton Memorial
 - 4 Spicer Memorial

2.3. Access Considerations

The site has excellent transport connectivity, with a PTAL rating of 6. The following modes of transport are within a short walking distance from the site:

- Underground: Westminster Station (District, Circle and Jubilee lines)
- Bus: Route 3 Oxford Circus - Crystal Palace AND Route 87 Aldwych / Somerset House - Wandsworth Plain
- Rail: Waterloo Station is approximately 1.2 miles away
- Bike: 86 existing cycle parking spaces are provided along Millbank and Abingdon Street; Santander Cycle Hire Docking points are located on Great College Street (20 docking points) and Smith Square (18 docking points)
- .
- River bus: All main services accessed from
 - Westminster Pier: 0.6 km / 9 minute walk to Gardens
 - Millbank Pier: 0.6 km / 9 minute walk to Gardens
- Coaches
- Taxis (Millbank)

The site is accessed from five main pedestrian entrances, of which four entrances are along Millbank and one off Lambeth Bridge north side. The main entrance is from Westminster, at the northern end of the site. Pedestrian flow studies have noted that the diagonal route through the park linking this entrance and the steps to Lambeth Bridge is the most intensely traversed. Currently there is only a perimeter path to the lawn area, with a path crossing to the Buxton Memorial in line with the pedestrian entrance at this location. All five entrances are currently used to access Victoria Tower Gardens and will have enhanced security measures as part of the UK Holocaust Memorial and Learning Centre proposals through the introduction of bollards at all entrances.

Source: Vehicular and Pedestrian Movement Report by Atkins

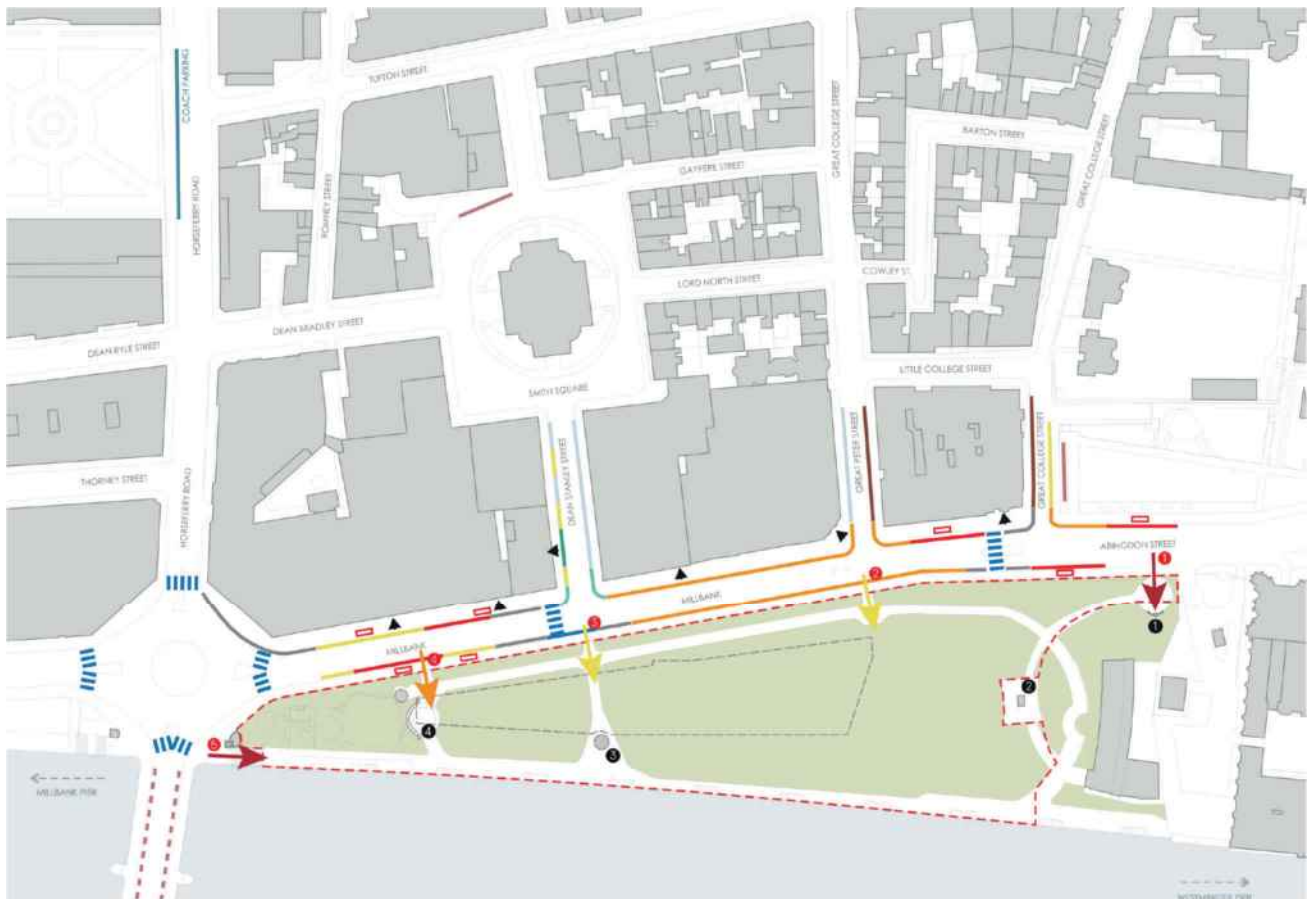


Diagram showing access to Victoria Tower Gardens

KEY

- | | |
|---------------------------------|--|
| ① Emmeline Pankhurst Memorial | Bus Stop Lane |
| ② Burghers of Calais | Bus Stop |
| ③ Buxton Memorial | Zebra Crossing |
| ④ Spicer Memorial | Double Yellow Lines |
| --- Project Location Boundary | Building Access |
| --- Proposed Building Perimeter | Motorcycles / Cycle Parking |
| ① Entrance Number | Pay by Phone |
| ➔ Primary Pedestrian Entrance | Resident Parking |
| ➔ Secondary Pedestrian Entrance | Single Yellow Line |
| ➔ Less used Entrance | Zebra Crossing |
| | Coach Parking |
| | Public Bike Hop-On / Drop Off |
| | ▶ Main Entrances to adjacent Buildings |



① Entrance from Westminster underground-gates and concrete barriers



② Entrance 2 by Great Peter Street-gates and pathway



③ Entrance 3 by Dean Stanley Street-gates and pathway



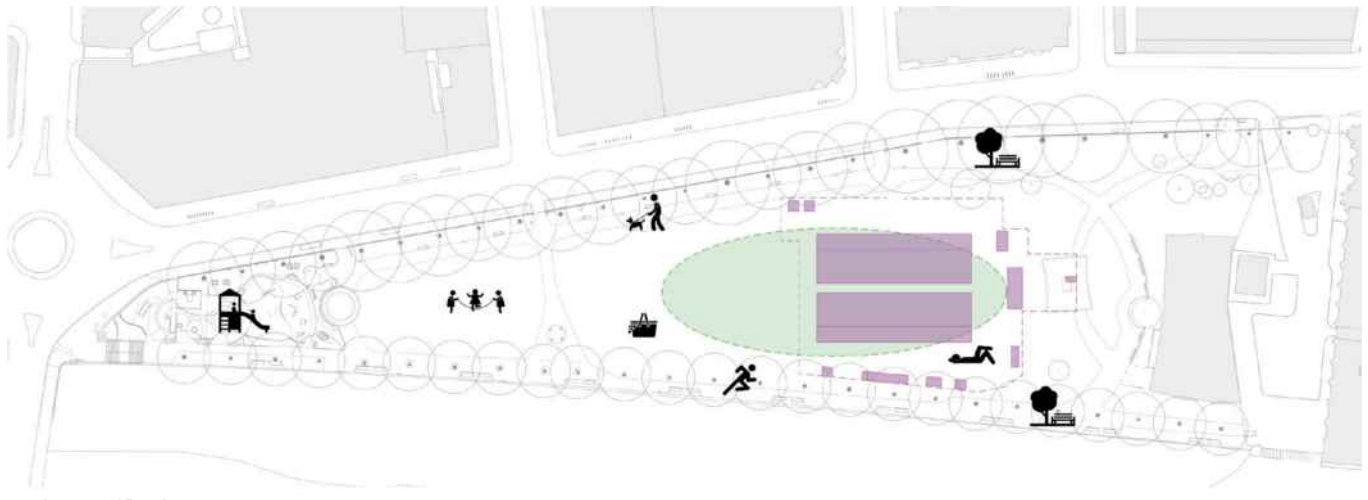
④ Entrance 4 by Millbank

Images of entrances to Victoria Tower Gardens

2.4. Activities and Events within the Gardens

The park currently has a range of programmed activities as well as supporting a wide range of visitors through the day. These include tourists taking a break from sightseeing in nearby Westminster, as well as many workers on their lunch breaks. The park is also well used by residents from the area and is especially popular with dog walkers. The playground is an important feature and provides playing space for the local children.

Any proposals for Victoria Tower Gardens North will need to maintain access for these users, and ensure continued future use. Royal Parks programmes a number of events during the year in the park including the *Luna* outdoor cinema, held in August. Consultation with Royal Parks identified the needs of these events and the general maintenance requirements for the park. Potential new events in the park will need to be compatible with the current Royal Parks' maintenance and access requirements.



Existing Activities and Events Locations

KEY

 Annual event Luna Open Air Cinema, runs in July occupying an area 90 m x 40 m approx.

 Potential picnicking area 3000 sqm
1500 people capacity

 Children's play area

 Dog walking

 Picnic area

 Relaxing area

 Jogging path

 Bench area

 Playground

3. Summary of Proposed Development

The overarching vision for the Memorial and Learning Centre is to retain Victoria Tower Gardens as a public park affecting minimal green space. In response to the popularity and importance of Victoria Tower Gardens, our proposal intervenes lightly, ensuring the park's existing uses can be retained and enhanced rather than replaced.

The Entrance Pavilion, located to the south of the Memorial, serves as an entrance gateway and allows the creation of a transitional space - the Courtyard - that enables visitors a calm moment of reflection away from everyday life before they make their journey down one of the passageways between the bronze fins of the Memorial, down to the underground Learning Centre.



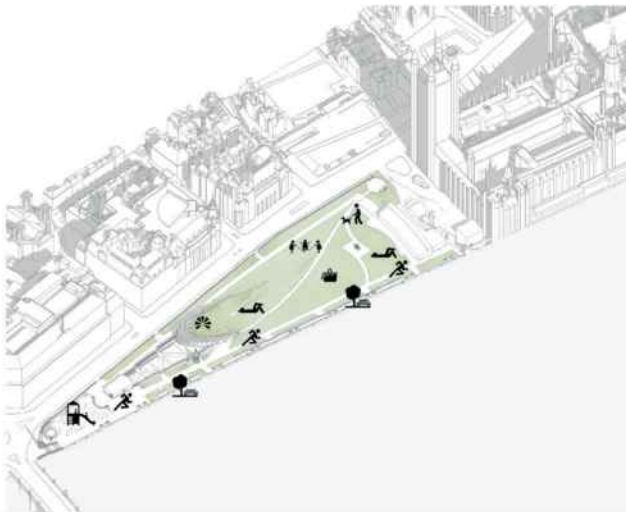
3.1. User Experience

Understanding the diverse uses of Victoria Tower Gardens, it was essential that the proposal not only allowed its current activities to remain, but also enhance the user experience.

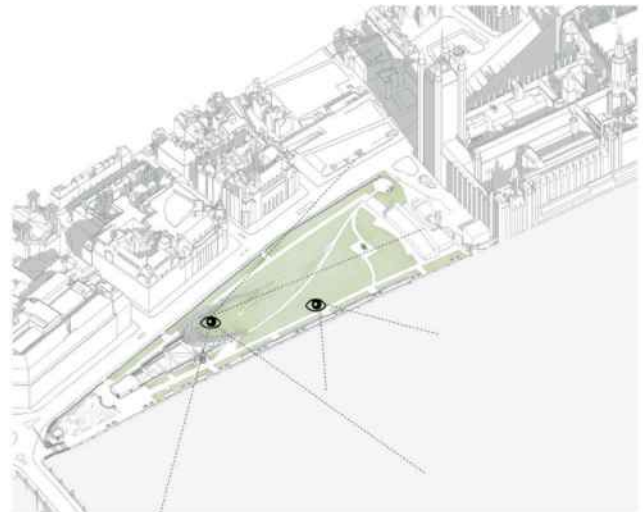
The newly sloping landscape provides visitors with a new vantage point to Parliament and the River Thames, a new perspective relationship to the overall memorial grounds and a distinctive entry point for the new Learning Centre. This subtle shift in the landscape allows for all existing memorials within the park to remain visible while creating a new sense of place within the gardens and establishing a new landmark within its immediate context.

Our proposal recognises Victoria Tower Gardens as a park of Britain's conscience. Our ambition is to complete the story of existing monuments by integrating the Holocaust Memorial with a rising landscape towards the southern end of the park. In doing so we pay deference to - and form a visual and physical link between - these monuments and the atrocities of the Holocaust. It is important for us that this new visual link is against the backdrop of an internationally iconic symbol of Britain's democratic ideals.

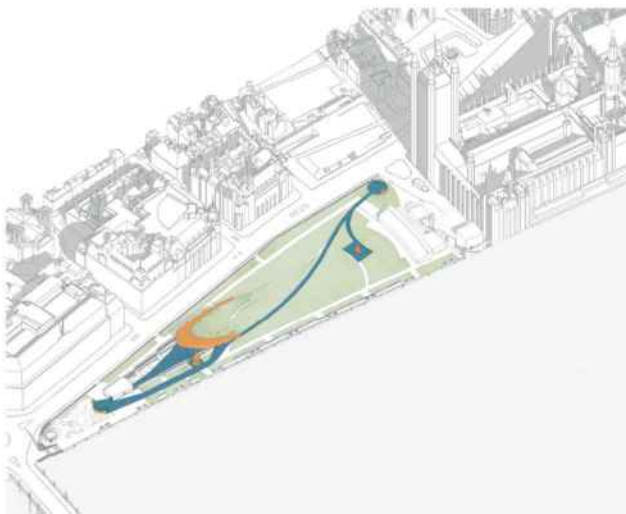
Proposed new path routes, connecting the main entrances in a diagonal north to south axis, reflect the existing main pedestrian flow which is currently through the middle of the lawned area to the south of the Burghers of Calais. The journey through the existing memorials culminates at the entrance of the UK Holocaust Memorial.



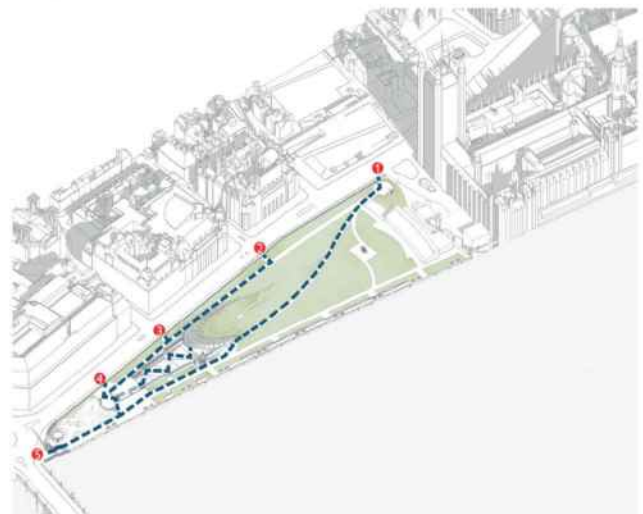
Existing garden uses are retained and enhanced



Forming Landscape Experience enhances the views to the Tames and to the Houses of Parliament



Placemaking diagram: Linking the memorials to complete the Gardens of Britain's Conscience



Landscape and Journey - new paths unify the gardens

KEY

Panoramic viewpoint

Children's play area

Dog walking

Picnic area

Relaxing area

Picture point

Jogging path

Bench area

New playground

Path linking the Memorials

Memorials

Entrance Number

Proposed main journeys

3.2. Journey within the Memorial Park

1. Arrival at Victoria Tower Gardens

The linear form of Victoria Tower Gardens, stretched out along the Thames embankment, suggests that most visitors will enter from the north and south entrances to the park on a route between the Houses of Parliament, Westminster Abbey and Tate Britain.

2. Landscape

The majority of visitors will arrive at the circular entrance space facing the Emmeline Pankhurst Memorial. At this point, our proposal has visitors encounter a new path which will curve diagonally through the park towards the dramatic perspective formed by the two rows of London Plane trees. These trees will frame the lifted landform, hinting at the presence of the UK Holocaust Memorial. As the path moves through the park, its curved form will accentuate the distance within the framed perspective of Plane trees, however the Memorial will also subtly exert its influence as one detects a shift in the ground, as the entire grass landform moves up to cover its form.

The path will take visitors on a journey through the Gardens' sequence of memorials to past injustices: The Emmeline and Christabel Pankhurst Memorial's commemoration of the right to universal suffrage; Rodin's Burghers of Calais, acknowledging their self sacrifice in defeat and subsequent pardoning by the victorious Edward III; and the Buxton Memorial that memorialises the abolition of slavery.

At the path's mid-point, the visitor's view will be lifted above the embankment wall to views of the shimmering light reflected off the waters of the Thames. As visitors move further towards the river embankment, they will clearly see the path pass to one side of the Buxton Memorial towards the entrance gateway which gives access to the National Holocaust Memorial.

3. Southern end of site

Visitors arriving from the entrance gate located at the southernmost end of the site, coming from Lambeth Bridge, will encounter a redesigned playground and cafe area, with the relocated Spicer Memorial as a background providing a physical separation to the National Holocaust Memorial entrance beyond.

4. Entrance Pavilion

The Entrance Pavilion not only serves as a conscious construct to assist pedestrian flow, safety and security to the Memorial and Learning Centre. It has also been designed as a transitional space that desensitises the visitor from the 21st century bustle they leave behind, creating a clear beginning to the visitor's journey.

5. Memorial courtyard

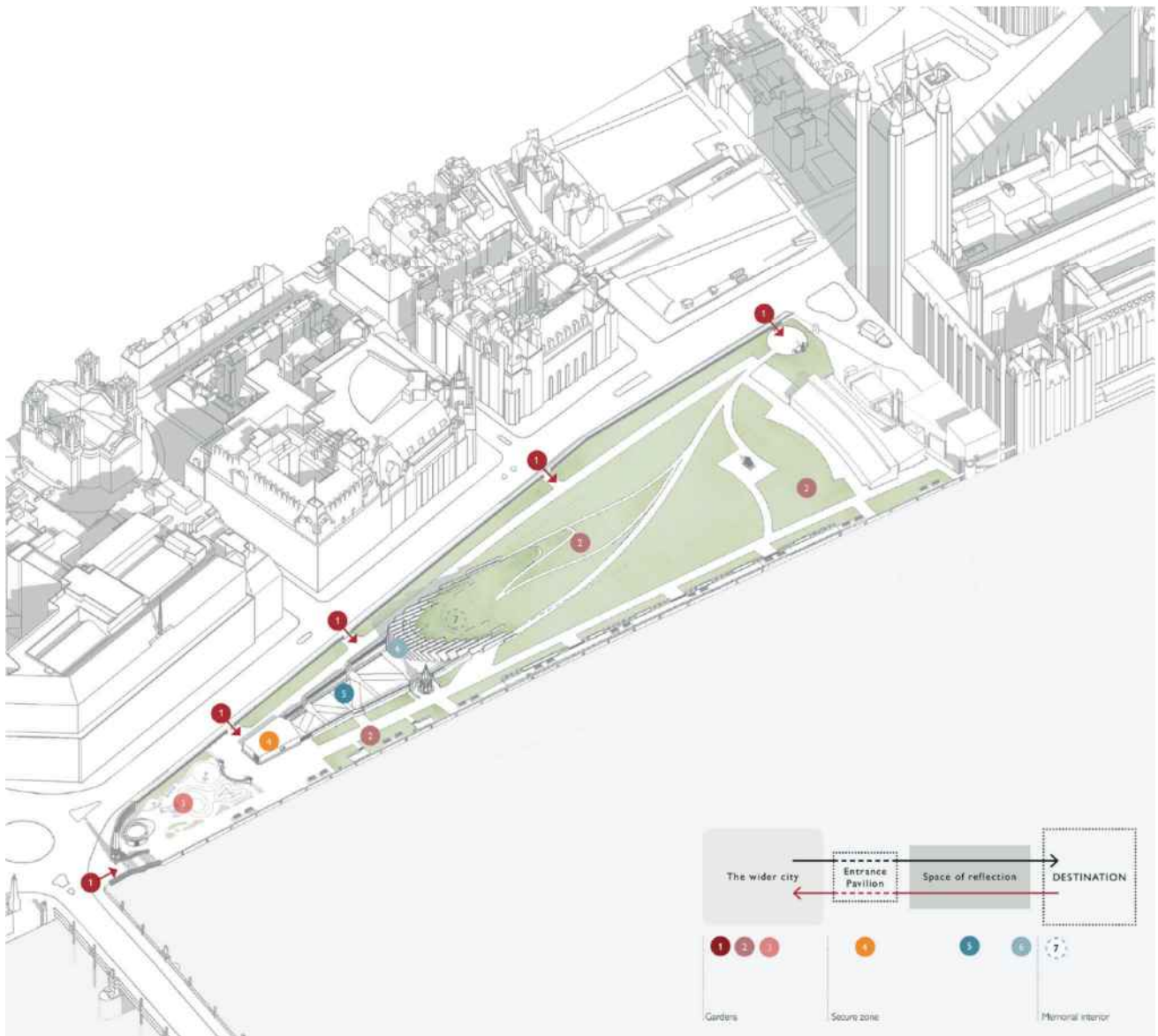
A unique, contemplative space that defines the relationship between the Entrance Pavilion and the Memorial and Learning Centre - a garden within the Victoria Tower Gardens. Its positioning and design creates an environment where visitors can linger and whose landscape offers a place of calm reflection before breaching the looming fins and down into the Learning Centre.

6. The Memorial

The Memorial will honour the six million Jewish men, women and children who were murdered in the Holocaust, and all other victims of Nazi persecution, including Roma, gay and disabled people. It comprises 23 bronze-clad walls forming ravine-like pathways representing each country in which Jewish communities were destroyed during the Holocaust.

7. Learning Centre

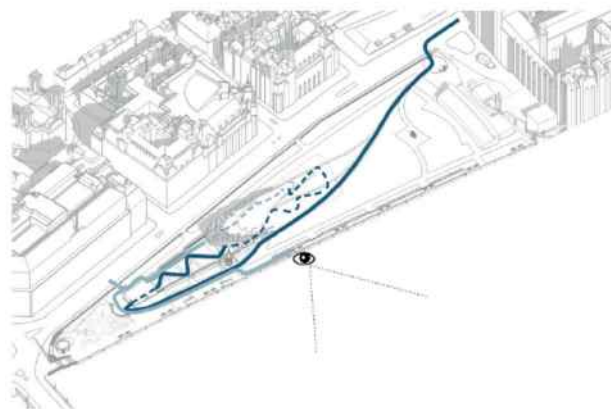
Visitors will enter the Learning Centre through the series of narrow passages formed by the 23 bronze blades of the Memorial, allowing them to effectively join the Memorial and physically become part of it. These blades will form both the building entrance as well as puncture the ground 8m down, carving the centre's underground learning spaces.



Arrival Sequence

KEY

- | | |
|-----------------------|---------------------------------|
| 1 Park Entrance | 5 Courtyard |
| 2 Landscape | 6 The Memorial |
| 3 Playground and Cafe | 7 Learning Centre (underground) |
| 4 Entrance Pavilion | |



This graphic element will accompany all stages of the journey throughout this chapter:

— Proposed entrance journey

- - - Proposed exit journey

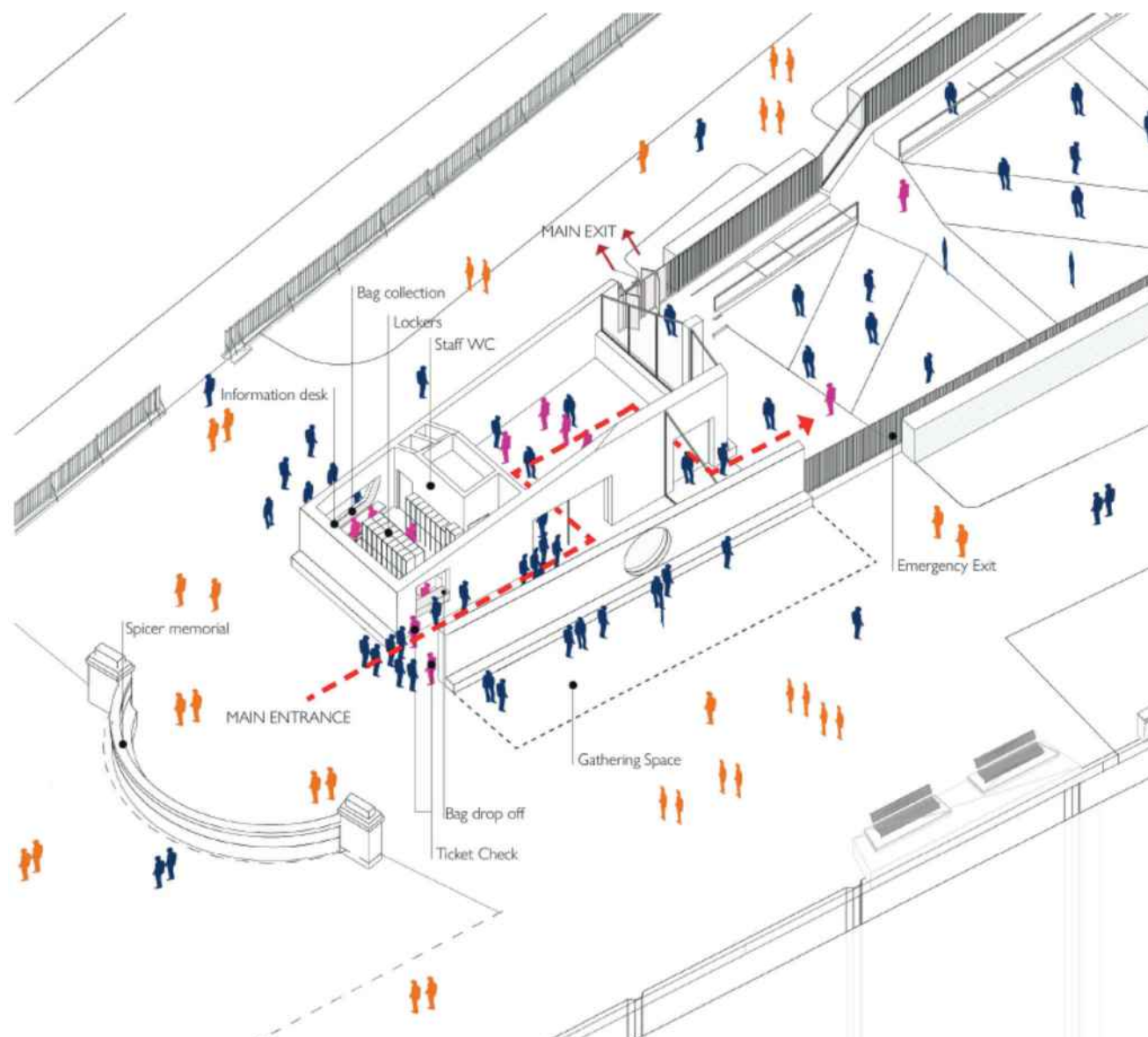
👁 Contemplation point

3.3. Visitor Arrival to the Memorial and Learning Centre

The Entrance Pavilion, located at the south end of the site, sets back a sufficient distance from the relocated Spicer Memorial to enable an adequate entrance area that would accommodate the Memorial visitors' entrance whilst simultaneously retaining the existing path widths clear for normal park users.

The small pavilion incorporates a covered entrance at the east side, where tickets will be checked, that creates a visual link to the Memorial. This space connects directly to the security area where small bags will be checked. The locker area includes two windows, one facing the covered entrance for a bag drop off desk and a second window facing Millbank providing information and bag collection points.

The proposal identifies a dedicated gathering area on the east side of the Entrance Pavilion where a long bench invites NHM visitors to sit or gather without disturbing the normal park users' movements.



Axonometric View of the Entrance Pavilion

The Memorial Courtyard was designed as a unique, contemplative space that defines the relationship between the Entrance Pavilion, the Memorial and Learning Centre - a garden within Victoria Tower Gardens. Its positioning and design create an environment where visitors can linger, with a landscape that offers a place of calm reflection before breaching the looming fins and down into the Learning Centre.

Through the creation of a framed platform, the plaza provides a large yet highly flexible environment for formal and informal ceremonies, services and other reverent gatherings.

The view over the Memorial and its bronze fins enables a unique opportunity for a first view of the journey ahead. The Memorial entrance is surrounded by the park and, in the background, the monumental Houses of Parliament.

The space of the Memorial Courtyard is defined as a series of gently sloping terraces, framed on either side by the perimeter walls, planting and railing. As the visitor descends their focus moves away from the surrounding park, and towards the Memorial. Moving below ground level, the courtyard buffers the sounds of Millbank, and creates a contemplative atmosphere.

The length of the courtyard is minimised through diagonal level paths. This approach is universal in allowing the visitors to choose their route, but they are encouraged to traverse the courtyard. This is the only way to truly experience the three-dimensional quality of the Memorial. Seating will be provided to support visitors of all age profiles, and encourage pausing, lingering, contemplation.

3.4. Arriving at and experiencing the Memorial, and entering the Learning Centre

The various pathways offer visitors of differing physical abilities the opportunity to experience the Memorial comfortably and safely. Most are retained as staircases, some are allocated to a fully accessible lift route, three are retained for ramped egress from the Learning Centre below, and others for miscellaneous uses including auxiliary circulation within the gardens.

All accessible paths culminate in the Threshold space which serves as a place of contemplation and transition into the Learning Centre, but also a generous hall from which to experience the Memorial from within.

Visitors will enter the Learning Centre through the series of narrow passages formed by the 23 bronze blades of the Memorial, allowing them to effectively join the Memorial and physically become part of it. These blades will form both the building entrance as well as puncture the ground 8m down, carving the centre's underground learning spaces.

3.5. Route through the Learning Centre

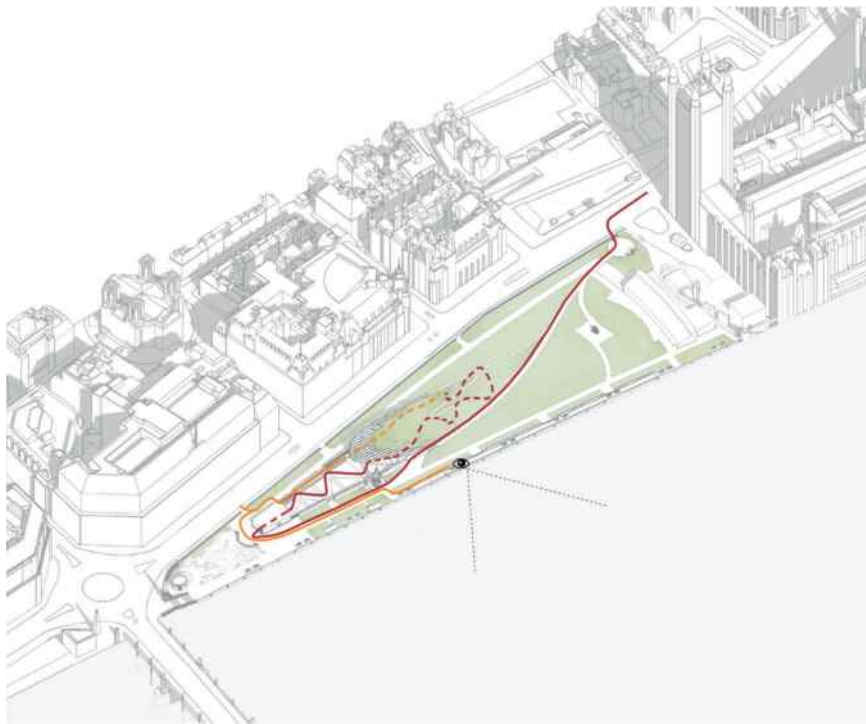
Through a careful sequencing of highly sensorial spaces, Adjaye Associates' design for the Learning Centre will lead visitors through the physical, intellectual and emotional experience of the British story of the Holocaust, and, in doing so, will draw out themes of the constant and universal human struggle for a better world.

Visitors will enter the Learning Centre through a series of narrow passages formed by the 23 bronze fins of the Memorial, allowing them to experience narrowness and the scale of the pathways as part of the entrance sequence. These 1.2 m wide entrance pathways, sectioned by the Memorial fins, will lead visitors through a series of dramatic stairs (as well as step-free routes) on their journey underground.

The paths will culminate in a shared experience – the Threshold space, which will orient visitors and set the mood for the material they are about to experience. Stripes of natural light, sneaking through the narrow entrance corridors, will cut through the vast black basalt flooring and establish a boundary between up and down, darkness and light.

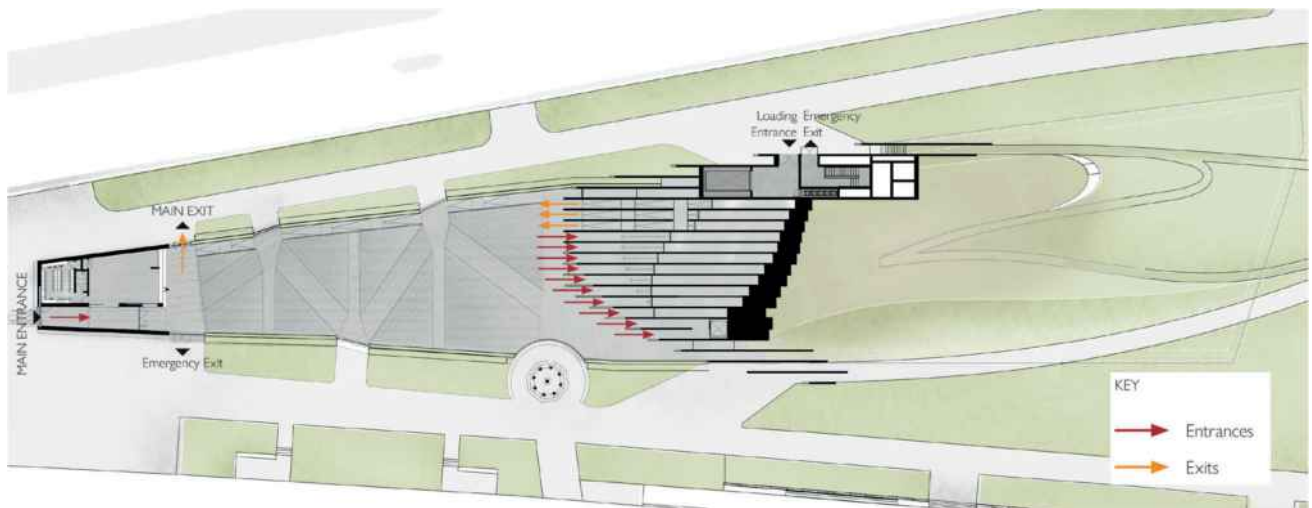
From there the visitors are encouraged to create their own journey through the Learning Centre, where the narrative content is designed.

At the end of their journey the visitors are invited to ascend to the mezzanine level, where a bookshop and a possible extended education space will add to the overall experience.



KEY

- Proposed entrance journey
- - - Entrance journey inside Learning Centre (underground)
- Proposed exit journey
- - - Exit journey inside Learning Centre (underground)
- 👁 Contemplation point



KEY

- ➔ Entrances
- ➔ Exits

Learning Centre Ground Floor Plan

4. Key Management Assumptions

This Visitor Management Strategy has been based on the following key assumptions anticipated for the operation of the UK Holocaust Memorial and Learning Centre:

- *Annual number of visitors entering UKHMLC – Maximum of 1 million*
- *Peak number of visitors entering UKHMLC a day – 3,000*
- *Peak number of visitors viewing but not entering UKHMLC a day – 7,000*
- *Opening hours – 09:30 - 17:30 (7 days a week)*
- *Peak number of visitors entering UKHMLC an hour – 375*
- *Maximum Learning Centre building capacity – 600*

5. Ticketing Strategy

5.1. Introduction

This section outlines the recommended strategy for the sale and validation of tickets to be implemented by the UK Holocaust Memorial and Learning Centre. The key to implementing the correct approach takes into consideration the effect this will have on local residents, existing users of Victoria Tower Gardens and the safety of visitors to the site.

Due to its location, the projected maximum of 1 million visitors a year to the Learning Centre, it is important to minimise the impact of people wishing to visit the site.

UK Holocaust Memorial Ltd proposes 100% advance booking for entrance into the Learning Centre therefore it will not be possible for visitors to acquire tickets at the Entrance Pavilion. Instead tickets will need to be pre-booked prior to their visit.

Prior to gaining entry via the Entrance Pavilion visitors:

- Must have acquired their entrance ticket
- Will be required to have their ticket validated and pass through the security checks (this may also include storing oversized bags in the locker facilities provided)

Demand tends to fluctuate at various times throughout the season, on different days of the week and at different times throughout the day. This can be influenced in part by new found interest, topical news events and marketing, national and international holiday periods, travel opportunities and primarily the weather. For the purposes of this document a typical busy day scenario has been used for modelling.

5.2. Ticket booking

There are many visitor attractions particularly in major cities that, like the UK Holocaust Memorial, require visitor flows to be regulated. For this reason the recommended control for managing visitor movement is the implementation of timed ticketing as this will significantly influence the arrival rate of visitors to the site.

In addition to creating regular timeslots throughout the day, timed ticketing also controls the maximum number of visitors arriving in each timeslot. This is determined by the overall site capacity and the average dwell time. The optimal granularity can be set accordingly however in general most sites adopt 30 minute timeslots which is also the proposal for the UK Holocaust Memorial.

5.3. Advanced booking channels

Encouraging customers to buy tickets ahead of their visit is by far the best option as it offers significant benefits to both visitors and the UK Holocaust Memorial. For the visitor it guarantees their preferred visit date and timeslot and they have their entrance ticket(s) already, allowing them to gain immediate entry on arrival.

For the UK Holocaust Memorial advance booking provides forward insight into how many visitors to expect on each of the coming days and at what times. Having access to demographic information provides insight into the audience.

Advance booking also provides a platform for visitors to research the experiences on offer to them before their visit, to understand the guideline requirements and key terms and conditions, and to get answers to any questions they may have in their own time. Armed with this information their visit on the day will be more streamlined for both parties.

Online booking

Online booking is the preferred channel for people planning to visit in advance.

The visitor will choose the date and time they wish to visit, select the number of ticket types and then proceed to the checkout screen. Most sales and admissions systems will email tickets, or allow the visitor to download their entry ticket(s) directly from the website during the booking process. Each ticket contains a unique barcode that can be used only once that confirms the visitors' arrival on the correct day and at the correct time.

Clear instructions would direct the visitor to print their e-ticket(s), or to have their e-ticket available for scanning from their phone or tablet on arrival in order to gain entry.

Mobile phone

Members of the public with mobile phones can purchase tickets themselves in advance or on the day via the online booking engine which will be part of the main website. This process could be encouraged through publicity and marketing material located in and around the Westminster areas and instigated by visiting a simple URL or by scanning a QR code with their mobile phone.

After booking the visitor would receive an email containing their booking reference and entrance barcode which they can take to the Entrance Pavilion to gain entry.

Contact Centre

For visitors wanting to guarantee their place who have no access to the public internet, a call centre facility can also be offered. In general bookings through this channel are low (2% to 10%) but they do offer the option of issuing advanced tickets. Any tickets booked will reduce the overall timeslot capacity and provide insight into the number of visitors expected on the day.

Schools and Groups

Education visits will be pre-booked with UK Holocaust Memorial directly. These visitors will most likely arrive by coaches bringing parties of circa 50 people at a time. For these groups the party leader will be issued with a single admission ticket that will allow all members to enter en masse.

5.4. Ticket booking criteria

For the UK Holocaust Memorial the assumptions used for modelling the visitor flows into the Learning Centre are as follows:

Annual attendance:	Maximum of 1 Million
Opening hours:	09:30 – 17:00 (Closing at 17:30)
Overall building capacity:	600 people
Recommended timeslot frequency:	30 minutes
Average party size:	2
Peak daily visitors:	3000
Peak max. no. of visitors (30 min period):	187 (375 per hour)
Number of tickets available daily (to accommodate no shows with entry being FOC):	3300
Number of tickets available per timeslot (to accommodate no shows with entry being FOC):	205 (410 per hour)
Average customer service enquiry time ^[a] :	50 seconds
Ticket checking validation time ^[b] :	10 seconds
Average security check times ^[c] :	20 seconds per person

[a] *Transaction times for booking tickets are based on a recent study carried out at The View from The Shard in London, where the attraction was selling walk up tickets with a range of scenarios including cash and credit card transactions, simple marketing data capture (i.e. country of origin, postcode), and trade partner transactions.*

In terms of transaction times, there is little difference between cash and credit card payments with Chip and Pin functionality and the option to use contactless technology. For the UK Holocaust Memorial a large proportion of the transactions will be zero value, removing the payment stage completely making the process even faster.

The range of times shown below reflect the propagation time for a visitor to walk from a queue line to a sales point, acquire their tickets, and leaving the sales point to the point where the next person begins the same process:

<i>Cash transaction, 1-4 people, with country and postcode capture</i>	<i>35 - 80 seconds</i>
<i>Chip & pin transaction 1-4 people, with country and postcode capture</i>	<i>35 - 70 seconds</i>
<i>Signed for transaction 1-4 people, with country and postcode capture</i>	<i>40 - 90 seconds</i>
<i>Trade partner transaction 1-4 people</i>	<i>50 - 100 seconds</i>

[b] Figures used for entry are based on pistol grip handheld scanners, scanning a variety of media including paper tickets, print@home A4 tickets, and mobile phone tickets. The times are based on a study carried out at The London Eye with mobile tickets using 2d barcodes, and paper tickets and print@home tickets using 1d barcodes.

[c] The times for the security checks are based on a statement from WSP who are security experts consulting in this area. Over a one hour period they confirm they are able to clear 250 people per lane which fits with the pre-empted throughputs outlined at busy times using 3 security check lanes.

$$250 / 60 \text{ minutes} = 4.166' \text{ people (15 seconds per person)}$$

With a maximum of 375 people set to come through in one hour, it will be possible to cope with the expected demand using 3 lanes as this would allow 20 seconds on average to be spent on each person.

There is also an option to use a 4th security lane at busy times comfortably supporting the throughput requirements.

In many circumstances checks are simple and individuals can be cleared quickly. For school groups it may be possible to do a collective check where the entire group can be pushed through in just a couple of minutes. The other extreme is where considerable time is needed with some of the more challenging visitors.

For the purposes of the modelling, and with the information provided, the time used for carrying out checks is 20 seconds per person.

Other considerations:

- The trend with most attractions is for timeslots at the start and the end of the day to be the quietest. This is influenced by sleeping and eating patterns, tourists arriving at locations after breakfast and before dinner, organised tour schedules etc. Demand tends to pick up around mid-morning and ease off again around tea time. For the purposes of this document the same trends have been applied to this model.
- The attendance has been apportioned accordingly across the day to provide an idea of demand, in particular to reflect busier conditions.
- The upper limit is set by the overall building capacity and the ability to move visitors comfortably through the ticket and security checks at the entrance.

Visitors that book online would be expected to bring their e-tickets to gain entry. A figure has been included to cater for those visitors who have misplaced/forgotten their tickets or had issues when attempting to print them at home.

The scenario used assumes the peak season period with opening hours from 09:30 to 17:00 last admission (closing at 17:30).

5.5. Visitors with disabilities and mobility issues

The number of wheelchair users in the UK is estimated to be around 1.2 million equating to approximately 1.9% of the overall population. It is estimated also that in total around 15% of the UK population has a disability. In the majority of cases the disability does not prevent the person from walking or moving freely, and in only some cases requires the assistance from an accompanying designated carer.

Consideration will be given to all aspects of accessibility in relation to acquiring tickets and gaining entry to the site at the point when the ticketing system selection is made.

In all cases the impact these provisions have on timings in relation to ticket booking and site entry is not affected.

5.6. Bag collection process

At peak times the bag collection process has been calculated to accommodate more than 25% of the total number of people arriving within each timeslot. This equates to 94 lockers per hour, and assumes a dwell time of 1 hour from drop to collection. With these parameters the locker facilities will be well within their maximum capacity.

With just one point returning bags, it should be possible to operate with little chance of a queue forming at all, however at busy times and with shared responsibilities with the customer service staff this can be avoided.

5.7. Ticket checking

The ticket checking process is very fast and efficient if managed correctly.

Using handheld scanners offers a great deal of flexibility and provides a friendlier, more welcoming interaction for visitors. Members of staff standing at the narrowest point at the Entrance Pavilion will scan visitors' tickets when entering the building to confirm they are valid. If so they can then proceed to the bag checking stage. If tickets are invalid visitors can be taken out of the queue line and dealt with accordingly.

On their approach to the scanning point, visitors will be asked to have their tickets ready for inspection. Those using their mobile phone as an e-ticket will be advised to have this readily available for checking. For families it is possible to have a single e-ticket that will verify and count the number of people in their family group.

Advanced tickets

Individuals

At their allotted time visitors will make their way through the gardens to the Entrance Pavilion where they will have their ticket validated prior to entering the security checks.

On arrival visitors will join the 'pre-paid' queue line that will be located either south of the entrance using Tensator style barriers to create a zig zag line to enter, or alternatively to the Thames side of the entrance running along the east wall of the building. The line will flow south and around the side of the main building where tickets will be scanned by a member of staff at the entrance.

Schools and groups

Schools and larger groups will most likely arrive on coaches. After disembarking they will normally be held outside the Entrance Pavilion in a briefing area to allow numbers to be confirmed prior to entry.

A single ticket can be used to admit the entire group as a whole to speed admission further. With the timed ticket model in place the number of individual visitors waiting to enter at this time will also be significantly reduced as a result, so even with the arrival of a large group the impact on the entrance is kept to a minimum.

5.8. Security checks

Based on an average time per person of 20 seconds to perform security checks, 3 lanes would be enough to clear 187 people in the space of 30 minutes. The queue backlog within the first 5 minutes peaks at 11. This illustrates that with only 3 lanes it would be possible to process individuals quickly enough to avoid having queues forming in the space outside the Entrance Pavilion.

5.9. Summary

The constants for the building capacity and the possible throughput, combined with industry trends illustrate that even with high demand, small party sizes (which take longer to process), and at the busiest times during the day, it is possible to comfortably manage the UK Holocaust Memorial entrance and keep queue lengths to a minimum, and in the majority of cases with no queues forming at all.

The timed ticketing and allocation management will ultimately be configured to accommodate 410 people per hour taking into account the site being 'Free to enter', and the potential for no shows. Maintaining an increased allocation will help on quieter days where the remaining capacity will still allow visitors to book at the last minute.

Timed ticketing along with capacity management for each timeslot will be implemented to control the rate of arrival, allowing only a finite number of visitors to physically book into the UK Holocaust Memorial at any one time. This will control the rate at which visitors arrive at, and have access to the site.

Booking in advance will be encouraged through the website allowing visitors to simply arrive and enter the site directly at their allotted time with either a pre-printed e-ticket or using the e-tickets directly from their mobile phones.

Separating the ticket booking and the entry stages ultimately avoids the need for visitors who have booked online and schools and groups from having to wait in line again when they already have their e-ticket. For visitors booking their place on the day the ticketing function can be performed anywhere without the need for visitors to go to the Entrance Pavilion.

Those visitors already in possession of a ticket will be guided using signage and by members of staff straight to the Entrance Pavilion entry point, whilst those who have yet to purchase a ticket will be advised to book online.

A detailed model testing 100% advance booking, with a maximum of 375 visitors per hour, which is considered a busy day, is available in the Appendix to this report.

In summary:

100% Advanced with no walk-up booking

Max. daily visitor numbers:	3000
Peak hourly throughput:	375
Transaction time:	N/A
Customer service enquiry time:	50 seconds

Ticket booking and customer service

- Ticket booking is not possible on site.
- One POS available to assist visitors with enquiries relating to lost tickets, reprinting tickets, re-booking and general questions about the memorial site.
- The table below summarises a busy day scenario investigated in this document in relation to customer service requirements.

	100% Adv / 0% Walk-up
Data capture	N/A
General parameters	
Number of daily visitors	3000
Timeslot granularity (minutes)	30
Average walk up transaction time (seconds)	60
Average enquiry transaction time (seconds)	50
Visitor split (Advanced vs Walkup)	
Max. no of visitors per timeslot	187
Max. number of walk up visitors	0
Max. no of advanced visitors	187
Total transaction processing times	
Max. total - walk up (minutes)	0
Max. total - enquiries (minutes)	15.6
Max. total (minutes)	15.6
POS Criteria	
Recommended number of POS (Sales points)	1
Transaction processing time per POS - This number needs to be below 30 minutes to keep on top of transaction processing	15.6
Queue lengths by no. of POS	
Queue length after 30 minutes of processing:	
with 1x POS	0
with 2x POS	0
with 3x POS	0
with 4x POS	0
with Queue busting Tablet(s)	0

Ticket scanning

- With 1x scanner validating tickets the queue length peaks at 41 people after 10 minutes, however this would be cleared by the end of the 30 minute period.
- With 2x scanners a queue never forms.

	Busy processing day	Comments
General parameters		
Number of daily visitors	3000	
Timeslot granularity (minutes)	30	
Max. no of visitors per timeslot	187.5	
Avg ticket check time (seconds)	10	
Total processing time (minutes)	31.7	
Scanner Criteria		
Recommended number of Hand Scanners:	2	
Scanning processing time per hand scanner - This number needs to be below 30 minutes to keep the flow of people moving through to the security lanes	15.85	
Queue lengths by no. of Hand Scanners		
Queue length after 30 minutes of processing:		
with 1x Hand scanner	7	
with 2x Hand scanners	0	
with 3x Hand scanners	0	
Initial inrush queue on the hour/ half hour:		
with 1x Hand scanner	26	Peaks at 41 after 10 minutes and whilst falling never clears
with 2x Hand scanners	0	Never forms
with 3x Hand scanners	0	

Security checks

- With 3x security lanes open the queue length peaks at 11 people within the first 5 minutes and clears completely after 10 minutes.

	Busy processing day	Comments
General parameters		
Number of daily visitors	3000	
Timeslot granularity (minutes)	30	
Max. no of visitors per timeslot	187.5	
Avg security check time (seconds)	20	
Total security processing time (minutes)	62.33	
Queue lengths by no. of Security Lanes		
Queue length after 30 minutes of processing:		
with 1x Lane	97	
with 2x Lanes	7	
with 3x Lanes	0	
with 4x Lanes	0	
Initial inrush queue on the hour/ half hour:		
with 1x Lane	41	Peaks at 103 after 20 minutes and never clears
with 2x Lanes	26	Peaks at 41 after 10 minutes and clears in the last minutes
with 3x Lanes	11	Initial peaks at 11 and clears in the following 5 minutes
with 4x Lanes	0	

Bag Collection

With just one customer service position returning bags from lockers, no queue would form.

100% Advance 0% Walk-up	1x POS For customer service	2x Hand scanners validating tickets	3x Security lanes	1x Bag collection window
Queue Length (people)	0 5 10 15 20 25 30 35 40 45 50 55 60 65 70 75 80 85 90 95 100			
Pre-opening Queue Length				
Sales Queue at Peak time				
Ticket Check				
Security Bag Check				
Bag Collection				

6. Operational Management Plan

6.1. Introduction

The purpose of the Operational Management Plan is to set out the guiding principles for the operation of the Holocaust Memorial and Learning Centre and to demonstrate the management philosophy which would be adopted by the operator.

6.2. Access

The Royal Parks opening hours for VTG are loosely based on dawn to dusk and the gardens are locked at night.

It is currently expected that the UK Holocaust Memorial and Learning Centre will be open seven days per week. The proposed opening hours are; 09:30 - 17:30.

There will also be invitation only events/exhibitions or pre-booked talks.

6.3. Security

Front of house and internal security will be of paramount importance, due to the subject matter and location of the Holocaust Memorial and Learning Centre. Front of house meet and greet staff, and security operatives will be to some extent interchangeable, with an appreciation of the subject matter, potential for visitors to belong to key groups such as Holocaust or other genocide survivors and their families.

Our specialist security consultant has sought and received advice from Metropolitan Police, Centre for Protection of National Infrastructure and Community Security Trust (CST) in developing their design proposals.

In planning the operational security we will continue to base our management procedures on advice from these agencies and take a risk-based, yet proportionate approach. The Holocaust Memorial and Learning Centre will require security staff trained to the specific requirements of organisations where great sensitivity and visitor awareness is required. CST has given us advice on this. For example, security operatives will be trained in visitor profiling, which is the first step in an effective security screening process.

6.4. Maintenance

UK Holocaust Memorial Ltd will manage the Holocaust Memorial and Learning Centre and will be responsible for running and maintaining all aspects of the premises, from security, IT, staffing and maintenance of the building and external hard and soft landscaping.

The annual operating budget will include provision for planned and reactive maintenance. Life cycle costings will be developed during the construction phase, and used to inform the maintenance budget planning process.

It is intended that areas of the garden re-instated above and around the Holocaust Memorial and Learning Centre such as the new grass bank, trees shrubs, hedges, and flowers will be maintained by Royal Parks under a maintenance agreement, agreed on commercial terms.

6.5. Opening and Closing Sequence

These arrangements are still to be finalised, and are provided as an illustration of what is a likely standard procedure.

The building will be opened each day by staff entering via the front door of the entrance pavilion, reporting their presence on site to the remote CCTV monitoring location and continuing to go through a set opening up and checking procedure.

At the end of a day there will be a “lock-down” procedure whereby the building is systematically checked to ensure nobody is left in the building, secure doors to key areas (such as from Threshold to Exhibition Space) will be locked, intruder alarms set, final checks of systems such as fire alarms. Security staff complete a daily status report and “handover” the building to remote monitoring station.

The building will be accessed out of park opening hours, by staff only (except for agreed events), from the vehicle gate nearest the service entrance, the Dean Stanley Street gate.

6.6. Normal daytime operating mode

VTG has five gates, from north to south. The streets referred to indicate the location of gates which are opposite side streets off Millbank as follows;

- Next to Black Rod's Garden (Abingdon Street)
- Great Peter Street
- Dean Stanley Street – vehicle access / service entrance to MLC
- Playground
- Lambeth Bridge Steps

It is anticipated that the majority of visitors will enter VTG via the northern-most gate at Black Rod's Garden, where the statue of Emmeline Pankhurst is located. They will then enter VTG and reach the Holocaust Memorial and Learning Centre via the sweeping curved path to be formed within the landscaping.

Visitors will arrive at the entrance pavilion to the Memorial and access it via a door on the southern side, entering a small portico, then turning to their left into the reception space where searching/screening takes place. As with Parliament, only small handbags and “day packs” will be admitted and all bags will need to be carried.

The reception is the point where visitor services staff will offer assistance and information, including booking for tours or timed entry tickets and turning away disappointed “walk-up” visitors.

Once visitors have passed through the security searching and screening reception visitors will re-enter the entrance portal, into the courtyard where they will be faced with the Memorial itself. From the courtyard there is a 2m descent to the Memorial via a series of gentle meandering (1:21) ramps/slopes. An alternative direct ramped route with handrails will be provided for mobility-impaired visitors.

Ample seating will be provided within the Courtyard, both for less mobile visitors and to give time to pause, view the memorial and contemplate the content, either on arrival or departure. The Courtyard space will serve as a space of preparation and contemplation on arrival and before departure.

On leaving the Memorial visitors will exit via doors in the west perimeter wall of the Courtyard, immediately before the Entrance Pavilion. They will not be required to pass back through the Pavilion itself.

As visitors leave via the west façade there will be options for them to leave the Memorial via the path closest to Millbank or the gate on to Millbank, thereby reducing the likelihood and impact of visitors arriving and leaving the Memorial via the same route.

The Courtyard will be provided with the infrastructure, in the form of built in cabling, socket points, and AV outlets, to service occasional events in the Courtyard such as Holocaust Memorial day. These occasional events will be planned and managed by the internal events team.

6.7. At Night

The Memorial will be lit with energy efficient lighting. Consideration will be given to light pollution, so it may be necessary to limit the hours of illumination. The new paths across the park leading to the Memorial will be provided with lighting to illuminate the footway, and mark the route to the Memorial.

The Holocaust Memorial and Learning Centre will be provided with CCTV and security lighting (modern infra red CCTV functions with minimal, if any, lighting).

Security and patrolling presence out of hours will be based on regular risk assessments.

6.8. Staffing

It is estimated that there will be approximately 20 staff based on site including front of house/visitor services and/or security staff, providing visitor reception, security screening and information. The front of house team will be sufficiently skilled, including in related security, visitor profiling, first-aid and emergency management.

Other staff will be split between onsite, nearby office locations e.g. for some back office functions, work from home and outreach services. There will be an onsite/on call duty manager. The building will be provided with a small office area, staff kitchen, rest room, and locker areas. Some services such as support services (HR, IT, legal, procurement), event management, web management, group booking and ticketing may be sub-contracted to external suppliers.

7. Visitor Flow and Gardens Capacity

7.1. Summary

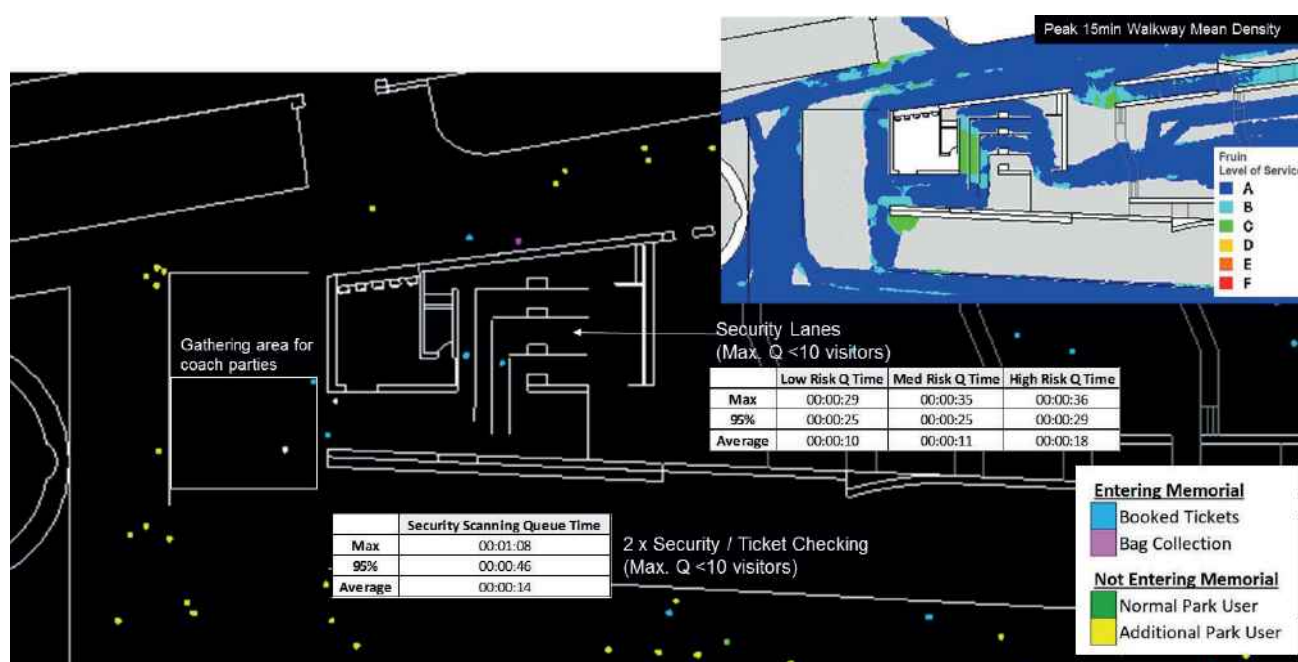
Detailed dynamic models have been developed to assess the entry arrangements for the expected visitor numbers to the UK Holocaust Memorial and Learning Centre. A dynamic model was also constructed to test the capacity of the Gardens itself as a result of unticketed visitors visiting to view but not enter.

Static and dynamic modelling was also carried out to assess the Gardens' gates and entry points.

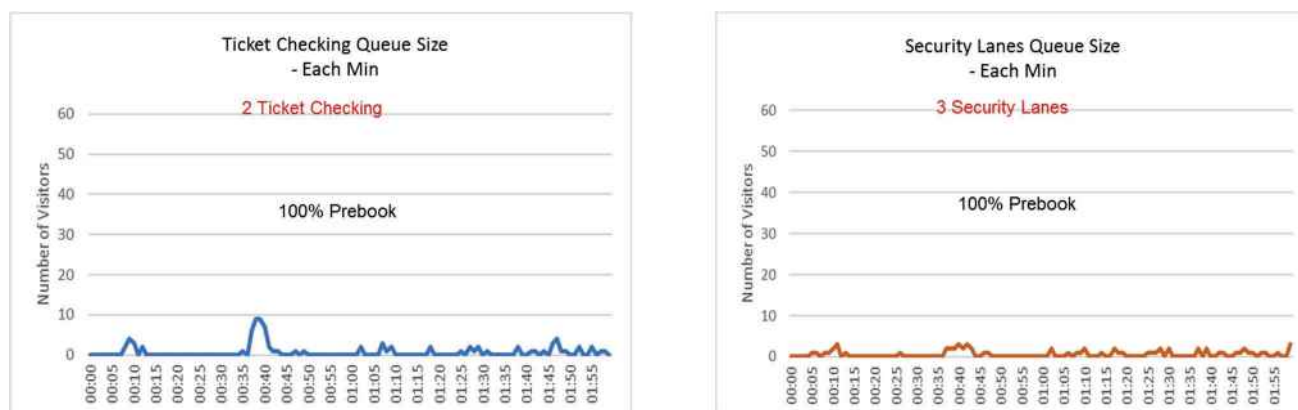
The modelling undertaken demonstrates that with a predicted 3,000 visitors per day entering the UKHMLC and 7,000 additional visitors to Victoria Tower Gardens to view but not enter UKHMLC there are no issues with pedestrian flow at the entrances to the Gardens, the entrance to the Entrance Pavilion, or with the capacity of the park in terms of crowding.

7.1.1 Dynamic Modelling

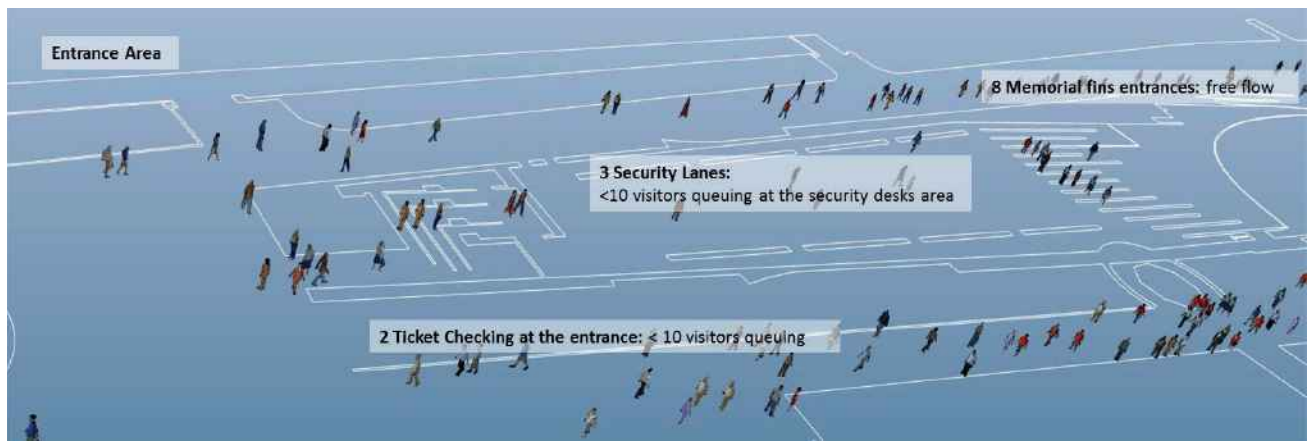
The model was run with the typical number of visitors in the peak hour of 375 in an hour of operation of the UKHMLC and 100% prepaid ticketing applied.



Entrance Area Results



Entrance Queue Size



Visualisation

7.1.2 Conclusion

The typical day scenario has been assessed using dynamic pedestrian models built in Legion SpaceWorks.

Ticket windows and security scanning are both manageable:

- No capacity issues
- The maximum queues are less than 10 visitors at both areas

Security Lanes

- No issues at security desks with a maximum of <10 visitors waiting at the ticket desks area for all scenarios
- In order to manage entry flows, hold the groups of visitors (currently 60 visitors) at the entrance area to maintain the clear space near security desks area

Memorial Courtyard and Fins

- No capacity issues

Interpretation Space

- Operates below its capacity throughout the typical day period (operates at ~50% capacity)

Exit ramps and revolving doors

- No circulation and capacity issues

Overall circulation and management

- No circulation and capacity issues
- No additional entry / exit flow management is required

Victoria Tower Gardens

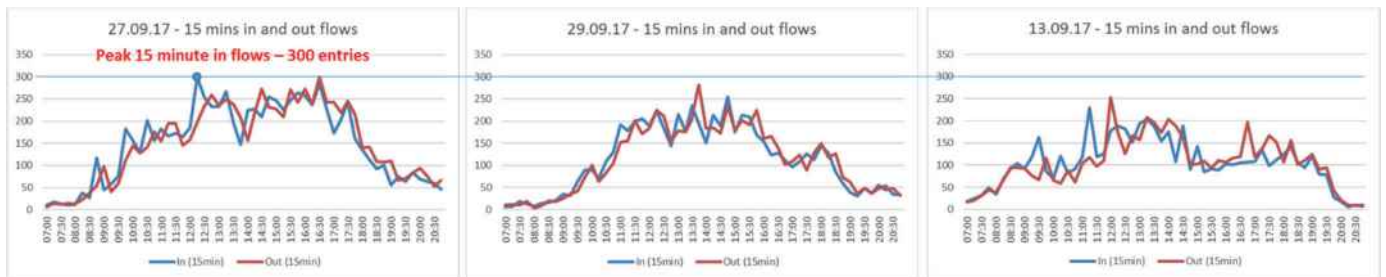
- Memorial users do not affect Victoria Tower Gardens users' movements

7.2. Victoria Tower Gardens

7.2.1 2017 Survey Data Analysis

Survey carried out by Intelligent Data Collection Limited (commissioned by Atkins)

- Days of Survey – 27/05/2017, 29/05/2017, 13/09/2017, Time period – 7:00 AM to 8:30 PM
- Methodology – count of people entering & exiting from each gate, aggregated over 15 minute time periods



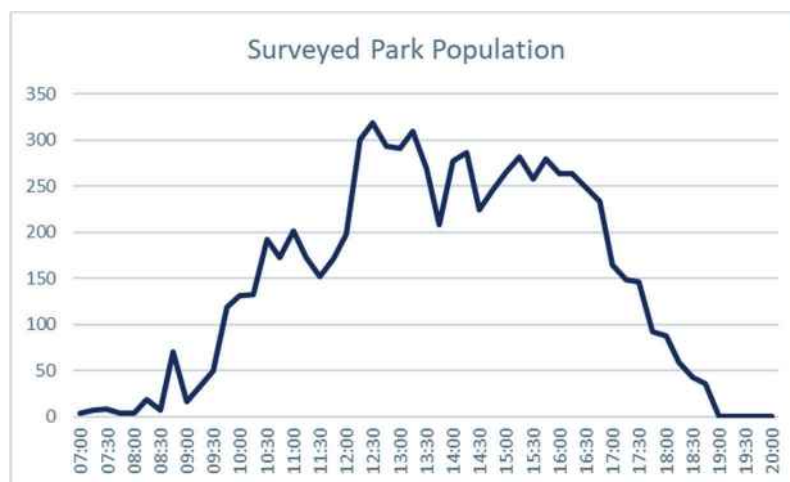
2017 Survey Data

Survey findings:

- The patterns of 15-minute in and out flow data indicates that Victoria Tower Gardens users were not staying for a long period of time
- The data indicates that a large number of Victoria Tower Gardens users walk in and out within 15 minutes segments – as the ins & outs follow the same pattern.
- The results show that the maximum of 300 people enter Victoria Tower Gardens in a 15 minute period and leave Victoria Tower Gardens in 15 minutes.

Busiest Periods, the peak surveyed Victoria Tower Gardens use:

- The busiest day was identified as 27/05/2017
- Within the survey the hour with the highest occupancy of people in the Victoria Tower Gardens was shown to be: 11:45 -12:45
- The peak Victoria Tower Gardens occupancy for 11:45 -12:45 was calculated by taking the exits away from the entries to leave the average number of people in the Victoria Tower Gardens during that time period.
- The survey revealed for 11:45 – 12:45:
 - 903 Entries in an hour
 - 736 Exits in an hour
 - 167 People on average remain in the Victoria Tower Gardens during that hour of the survey
 - When added to the residual from the previous time period = 319 people



2017 Survey Data – Victoria Tower Gardens Population

7.2.2 Dynamic Pedestrian Modelling on a Peak Day

Methodology

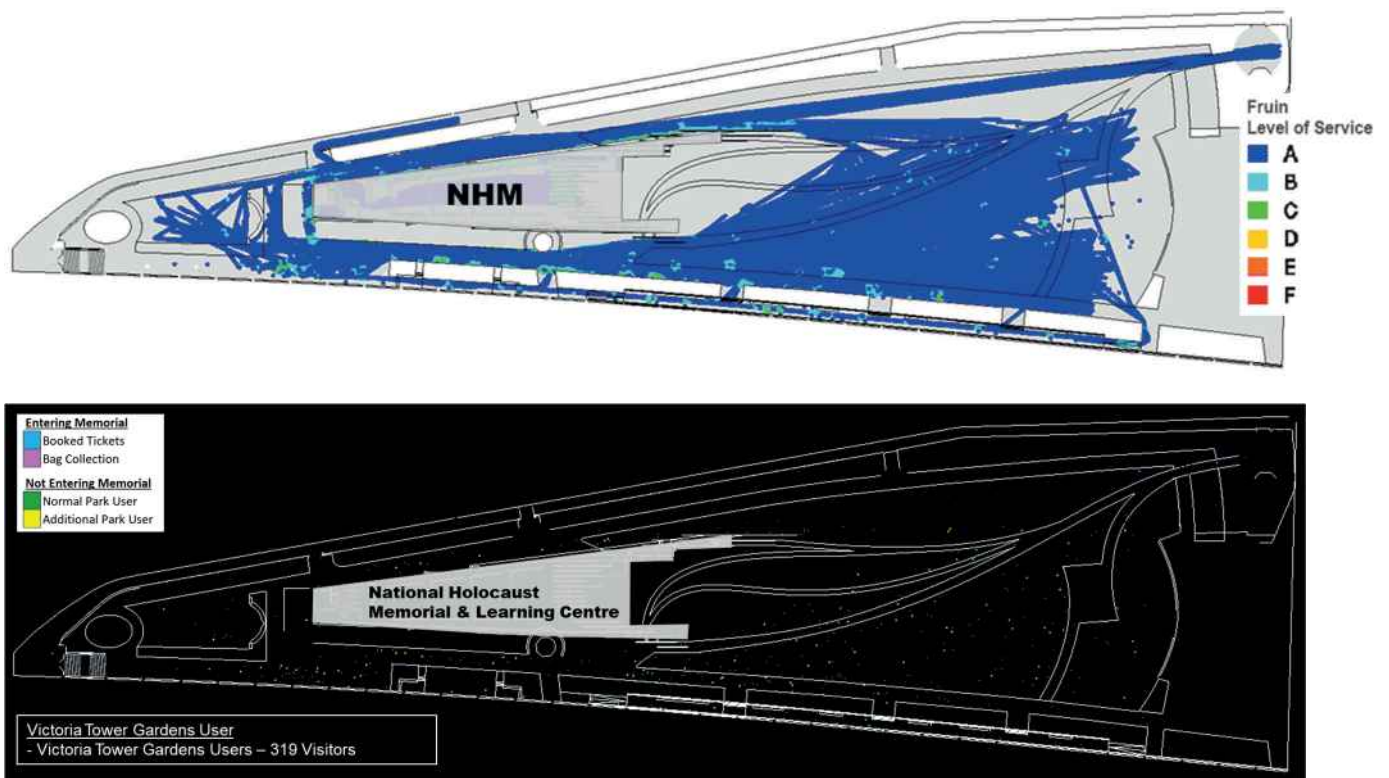
The following methodology was adopted for the dynamic modelling of Victoria Tower Gardens:

- The surveyed peak period average occupancy was shown to be – 319 people
- Victoria Tower Gardens has been dynamically modelled using Legion Spaceworks to represent the surveyed population as stationary users
- The UKHMLC is also likely to attract additional visitors to Victoria Tower Gardens to view the building, these people are shown in the model as circulating as they are more likely to walk around the Victoria Tower Gardens to view the iconic building from each side.
- In order to test the Gardens on a peak day a peak period population of 319 people has been applied.

Results

The following figures illustrate the Fruin Levels of Service for Victoria Tower Gardens dynamic model for a busy day.

Peak 15min Walkway Mean Density – Assessing circulation movements in the Victoria Tower Gardens



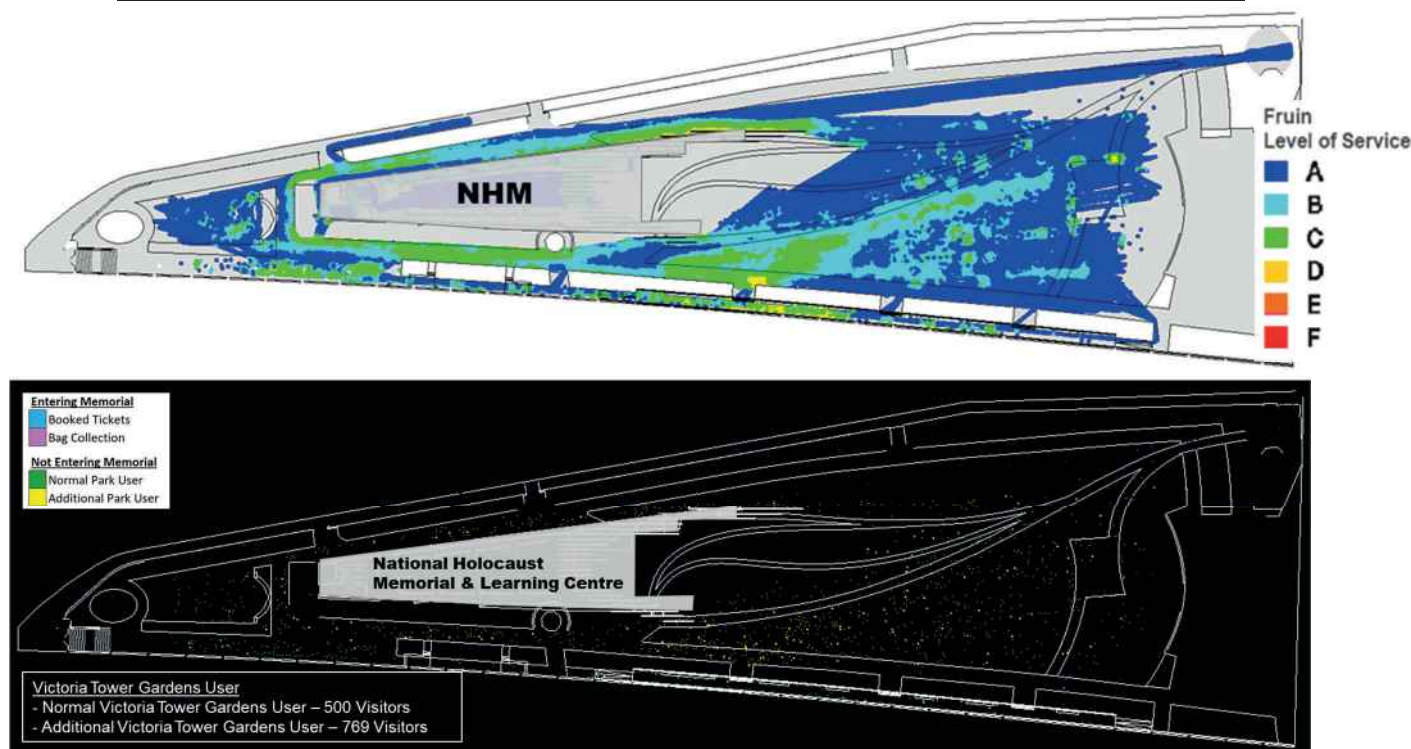
Victoria Tower Gardens – Peak Day

7.2.3 Additional Visitors

In order to test the resilience of the park to additional visitors the pedestrian demand has been tested as specified within the WSP Transport Assessment to test Victoria Tower Gardens during the peak hour period (1,269 per hour), this peak period is derived from the daily figure of 10,000 people.

- Victoria Tower Gardens
 - Total of 1,269 people - 500 normal park users (stationary) + 769 additional park users (circulating)

Peak 15min Walkway Mean Density – Assessing circulation movements in the Victoria Tower Gardens



Victoria Tower Gardens With Additional Visitors

7.2.4 Dynamic Modelling Conclusion

Peak Day Model Conclusions

- A pedestrian model was built to show a busy day in Victoria Tower Gardens. This showed the 2017 survey total of 319 people as well as ticketed UKHMLC visitors.
- This test showed no pedestrian density or capacity problems. The Gardens' current users would be in no way impinged.

7.2.5 Victoria Tower Gardens with Additional Visitors Conclusions

- Victoria Tower Gardens was tested with pedestrian demand as shown in the WSP Transport Assessment which was derived from the daily 10,000 people, the results represent visitors in Victoria Tower Gardens to view but not entering the NHM.
- The result show that even with the population of 1,269 people made up of 500 users standing/sitting and 769 actively circulating within Victoria Tower Gardens, outside of the NHM, there are no capacity or circulation issues experienced by the pedestrians modelled.
- The test also illustrates that the NHM visitors do not affect the normal Victoria Tower Gardens users' movements based on the modelled demand.

7.2.6 Entry & Exits Analysis

The entry points to Victoria Tower Gardens were assessed to determine the current levels of use and the future requirements to cater for the flows identified above.



Victoria Tower Gardens Entry Points

Entry and exit flow assignments:

- The peak 15 minute entry and exit flows have been extracted from 2017 survey data
- The usage of each entrance has been identified from the total entries and exits during the peak 15 minute of the survey (column: % Usage)
- In order to determine the width requirements, the entry and exit flows have been converted into minute flows and assigned to each entrance based on % usage.
- A group of 60 people arriving in the first 5 minute from a coach has also been added at Entrance 4 (UKHMLC/Coach Entrance) for all scenarios
- The typical day hour 350 UKHMLC visitors are included in all scenarios

Sizing requirements

- Required Entrance width (m) – the width requirements have been identified based on Fruin's Level of Services, Walkway Mean Density of C (Standard requirement for a passageway)
- Provided Entrance width (m) – Current entrance widths included for comparison

The table below shows two way flow per minute during the peak 15 minute period for each scenario by entrance, the required width at each entrance for the highest flow (1000 sensitivity test) and the current entrance provision:

	% Usage	334 (2017 survey)	500 (Sens. Test)	750 (Sens. Test)	1000 (Sens. Test)	Required Entrance width (m)	Provided Entrance width (m)
Entrance 1	60%	20	26	36	46	1.8	3.6
Entrance 2	5%	7	8	9	10	0.9	3.7
Entrance 3	7%	8	9	10	11	0.9	3.6
Entrance 4 (NHM/Coach Entrance)	5%	19	20	21	22	1.2	3.7
Entrance 5	24%	12	14	18	22	1.2	5.8

Entrance Capacity Requirements

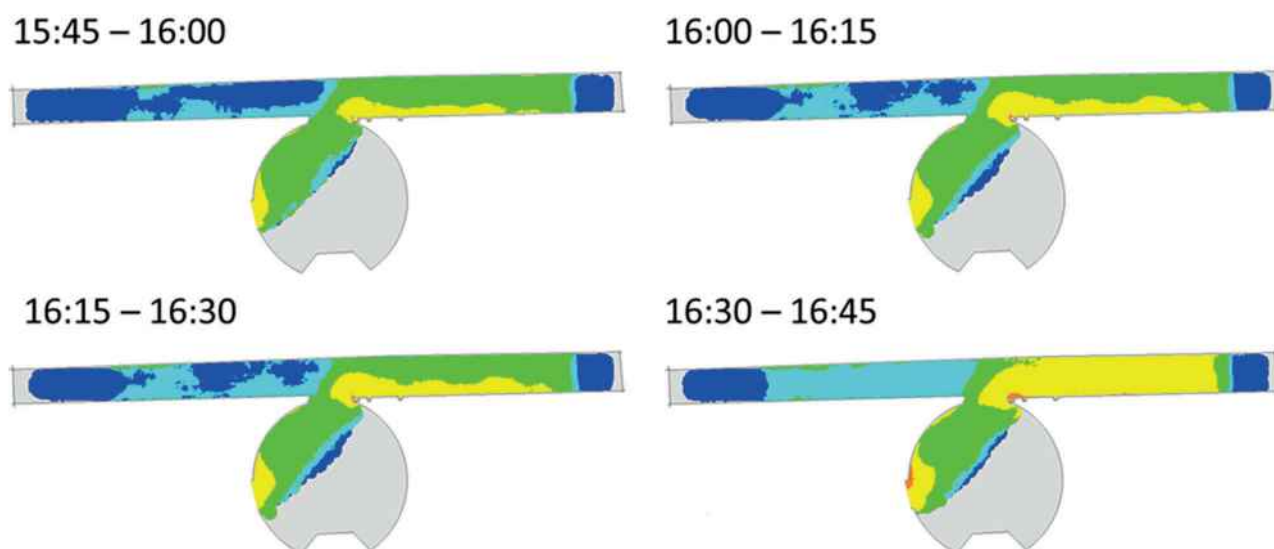
7.2.7 Conclusion

No capacity issues have been identified at any Victoria Tower Garden Park Entrance, as the current entrances provide enough capacity to easily cope with the additional UKHMLC demand as well as the sensitivity levels.

7.2.8 Entry Dynamic Modelling

Entrance 1 was shown by the survey to be the most used entrance to Victoria Tower Gardens, as this is likely to be the entry point for a high proportion of visitors to the UKHMLC. The footway and entry were dynamically modelled to ensure there was sufficient capacity available to accommodate all users.

The figures below illustrate the Fruin LoS for the peak hour in terms of flows into the park which consist of UKHMLC ticketed visitors, UKHMLC unticketed visitors and day to day users as revealed by the surveys.



Victoria Tower Gardens Busiest Entry Point

The figure above shows that the gate operates satisfactorily during the peak 15 minute period modelled with flows generated by the WSP Transport Assessment. At the busiest time there would be some slowing down of pedestrians through the gate, however, this only lasts for a short time and disperses quickly after the peak 15 minute period.

Appendix 1 – Typical customer service scenario

Full capacity throughout the day (3000 / day – 375 / hour)

100% of bookings are made in advance. No POS transactions are made on site at all, however time has been allowed for customer service questions, to look up bookings in the case where tickets have been lost, or there is a problem with a booking. The transaction time allowed for this is 50 seconds.

The results indicate that with just 1 POS it would be possible to support customer requests in 18.7 minutes.

Avg Trn time - walk up (seconds):		60			Number of POS:		1
Avg Trn time - advanced (seconds):		50			Max 30 min sales (minutes):		17.2
Advance sales intervention (%):		10			Processing time/POS (minutes)		17.2
Avg party size:		2.0					
Daily attendance:		3000					
Sales channels (%):			100	0			100
Period		%		%	3000		%
% Daily Attendance	Time	Volumes			Sales (minutes)		Entrance sales
		Total	Advance	Walk Up	Total Trn time	Advance Trn time	
0	09:00	0	0	0	0.0	0.0	0.0
6.25	09:30	188	187.5	0	15.6	15.6	15.6
6.25	10:00	188	187.5	0	15.6	15.6	15.6
6.25	10:30	188	187.5	0	15.6	15.6	15.6
6.25	11:00	188	187.5	0	15.6	15.6	15.6
6.25	11:30	188	187.5	0	15.6	15.6	15.6
6.25	12:00	188	187.5	0	15.6	15.6	15.6
6.25	12:30	188	187.5	0	15.6	15.6	15.6
6.25	13:00	188	187.5	0	15.6	15.6	15.6
6.25	13:30	188	187.5	0	15.6	15.6	15.6
6.25	14:00	188	187.5	0	15.6	15.6	15.6
6.25	14:30	188	187.5	0	15.6	15.6	15.6
6.25	15:00	188	187.5	0	15.6	15.6	15.6
6.25	15:30	188	187.5	0	15.6	15.6	15.6
6.25	16:00	188	187.5	0	15.6	15.6	15.6
6.25	16:30	188	187.5	0	15.6	15.6	15.6
6.25	17:00	188	187.5	0	15.6	15.6	15.6
0	17:30	0	0	0	0.0	0.0	0.0
0	18:00	0	0	0	0.0	0.0	0.0
0	18:30	0	0	0	0.0	0.0	0.0
0	19:00	0	0	0	0.0	0.0	0.0
0	19:30	0	0	0	0.0	0.0	0.0
0	20:00	0	0	0	0.0	0.0	0.0
100		3000	3000	0			

Appendix 2 – Ticket checking scenarios in detail

The table below shows the entrance timings based on the known visitor throughput at busy times and the number of staff/scanners required to process visitors within the 30 minute period.

Busy day – fully booked

Avg ticket check time (seconds):		10		
Daily attendance:		3000		
Period				
% Daily Attendance	Time	Visitors	Ticket validation time (minutes)	No of entry scanners
0	09:00	0	0.0	0.0
6.25	09:30	188	31.3	1.1
6.25	10:00	188	31.3	1.1
6.25	10:30	188	31.3	1.1
6.25	11:00	188	31.3	1.1
6.25	11:30	188	31.3	1.1
6.25	12:00	188	31.3	1.1
6.25	12:30	188	31.3	1.1
6.25	13:00	188	31.3	1.1
6.25	13:30	188	31.3	1.1
6.25	14:00	188	31.3	1.1
6.25	14:30	188	31.3	1.1
6.25	15:00	188	31.3	1.1
6.25	15:30	188	31.3	1.1
6.25	16:00	188	31.3	1.1
6.25	16:30	188	31.3	1.1
6.25	17:00	188	31.3	1.1
0	17:30	0	0.0	0.0
0	18:00	0	0.0	0.0
0	18:30	0	0.0	0.0
0	19:00	0	0.0	0.0
0	19:30	0	0.0	0.0
0	20:00	0	0.0	0.0
100		3000		

Taking one of the busiest times and the suggested number of staff/scanners required to process members of the public, we can estimate the rate of arrival within the 30 minute period and model this to gain some insight into how long the queues may be.

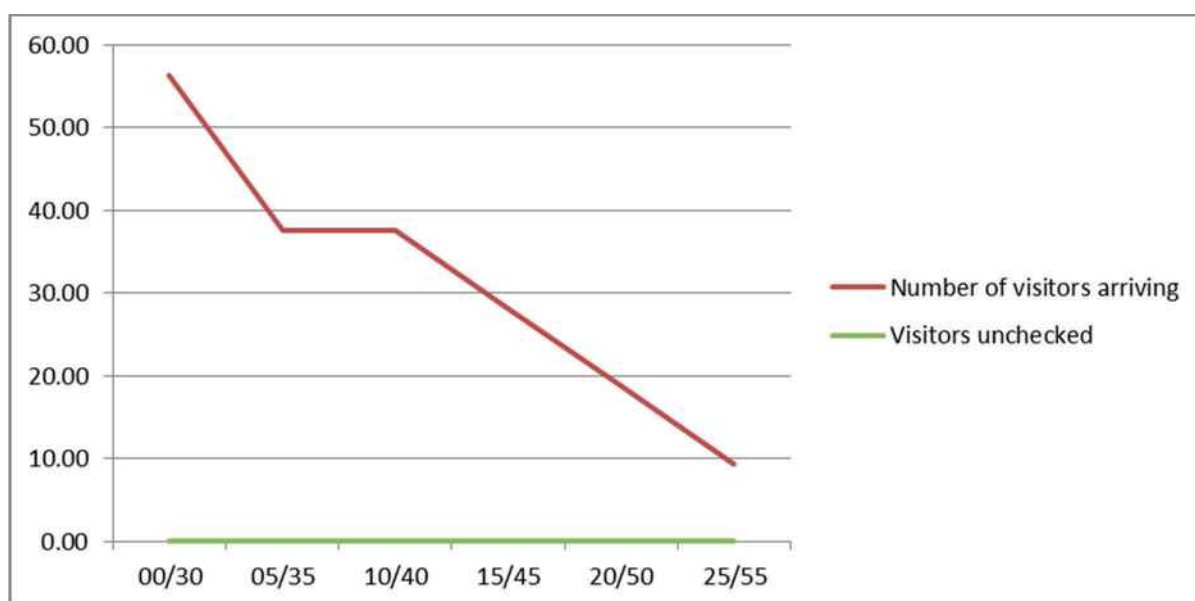
		Number of staff/lanes	Avg. processing time (secs)	Visitors processed per minute	Visitors processed per 5 mins
			with (Number of staff)		
Number of scanners:		2	5	12	60

Based on a 10 second average propagation time for validation, the number of staff required to validate the initial 56 entry tickets is just 2. The queue is processed quickly leaving no backlog after the first 5 minutes even with new visitors arriving.

Throughput with 2 hand scanners

% Arrival	Minutes past	Validation time total	Number of visitors arriving	Visitors unchecked
30	00/30	9.38	56.25	0.00
20	05/35	6.25	37.50	0.00
20	10/40	6.25	37.50	0.00
15	15/45	4.69	28.13	0.00
10	20/50	3.13	18.75	0.00
5	25/55	1.56	9.38	0.00
100	0	31.25	187.50	

The table above and the graph below show the arrival rate of visitors within each 5 minute period inside the 30 minute timeslot, and also the number of unchecked visitors with just 2 members of staff scanning tickets. The visitors are cleared completely within the first 5 minutes.



Appendix 3 – Security check scenarios in detail

The table below shows the entrance timings based on the known visitor throughput at busy times and the number of staff/security lanes required to process visitors in less than 30 minutes.

Busy day – fully booked

Avg security check time (seconds)		20		
Daily attendance:		3000		
Period				
% Daily Attendance	Time	Visitors	Security check time (minutes)	No of security staff
0	09:00	0	0.0	0.0
6.25	09:30	188	62.5	2.1
6.25	10:00	188	62.5	2.1
6.25	10:30	188	62.5	2.1
6.25	11:00	188	62.5	2.1
6.25	11:30	188	62.5	2.1
6.25	12:00	188	62.5	2.1
6.25	12:30	188	62.5	2.1
6.25	13:00	188	62.5	2.1
6.25	13:30	188	62.5	2.1
6.25	14:00	188	62.5	2.1
6.25	14:30	188	62.5	2.1
6.25	15:00	188	62.5	2.1
6.25	15:30	188	62.5	2.1
6.25	16:00	188	62.5	2.1
6.25	16:30	188	62.5	2.1
6.25	17:00	188	62.5	2.1
0	17:30	0	0.0	0.0
0	18:00	0	0.0	0.0
0	18:30	0	0.0	0.0
0	19:00	0	0.0	0.0
0	19:30	0	0.0	0.0
0	20:00	0	0.0	0.0
100		3000		

Taking one of the busiest times and the suggested number of staff/lanes required to process members of the public, we can estimate the rate of arrival within the 30 minute period and model this to gain some insight into how long the queues may be.

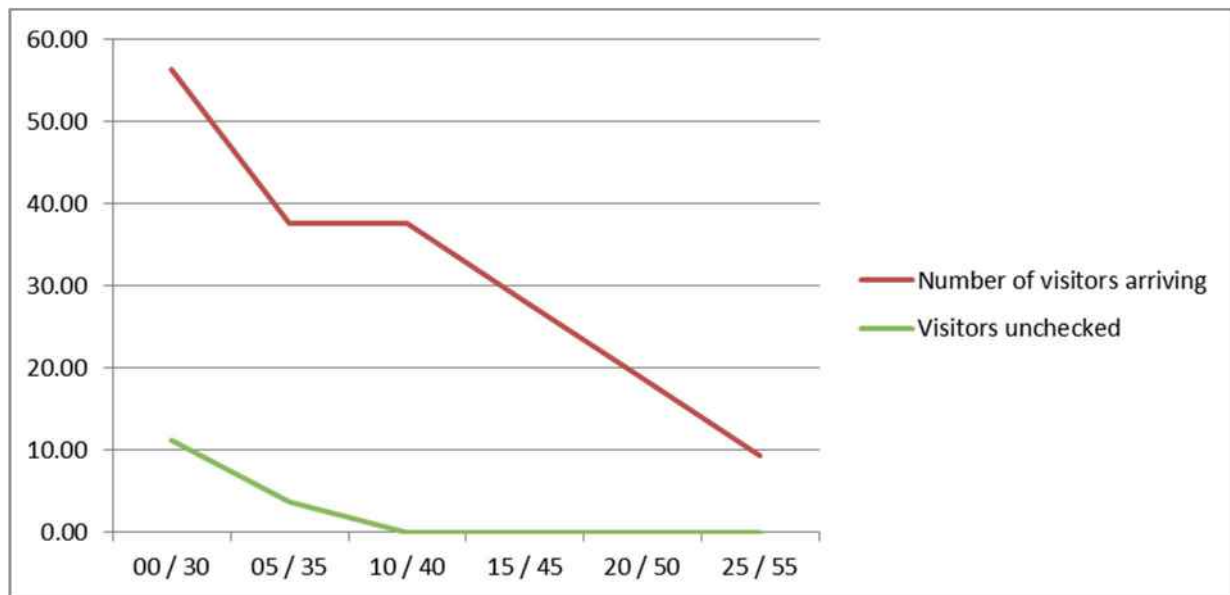
		Avg. processing time (secs)	Visitors processed per minute	Visitors processed per 5 mins
	Number of staff/lanes	with (Number of staff)		
Number of Security Staff:	3	6.666667	9	45

Based on a 20 second average propagation time for bag checks, the minimum number of staff required to check 56 visitors property is 3. This leaves a peak backlog of 11 people within the first 5 minutes. This is cleared in the next 5 minutes with no visitors remaining by end of the 30 minute timeslot.

Throughput with 3 security lanes

% Arrival	Minutes past	Validation time total	Number of visitors arriving	Visitors unchecked
30	00 / 30	18.75	56.25	11.25
20	05 / 35	12.5	37.50	3.75
20	10 / 40	12.5	37.50	0.00
15	15 / 45	9.375	28.13	0.00
10	20 / 50	6.25	18.75	0.00
5	25 / 55	3.125	9.38	0.00
100	0	62.5	187.5	

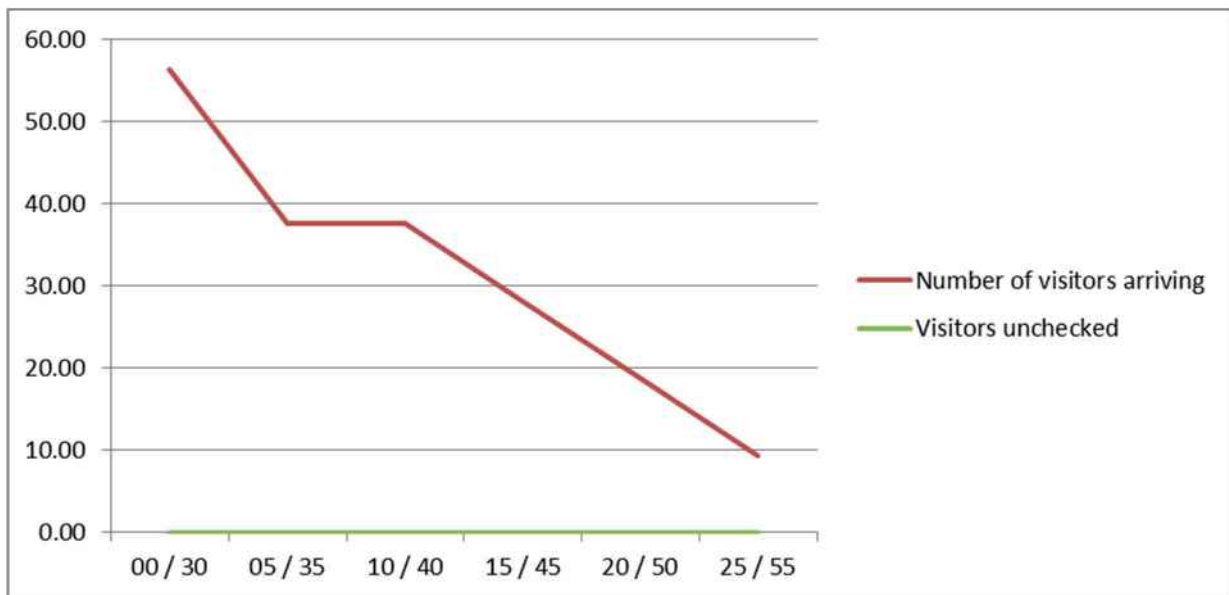
The table above and the graph below show the arrival rate of visitors within each 5 minute period inside the 30 minute timeslot, and also the number of unchecked visitors with just 3 security lanes open.



With the option of opening the 4th lane the queue would be cleared even quicker, with the potential to have no backlog at all.

Throughput with 4 security lanes

% Arrival	Minutes past	Validation time total	Number of visitors arriving	Visitors unchecked
30	00 / 30	18.75	56.25	0.00
20	05 / 35	12.5	37.50	0.00
20	10 / 40	12.5	37.50	0.00
15	15 / 45	9.375	28.13	0.00
10	20 / 50	6.25	18.75	0.00
5	25 / 55	3.125	9.38	0.00
100	0	62.5	187.5	



Appendix 4 - Bag collection scenario

Bag collection scenario based on 25% of visitors (47 people)

Total number per timeslot:	187.5					
Percentage (checking bags in):	25 %				1 Position	
			Minute	People arriving in queue	Processed	Queue Length People
Bag collection total (30 mins):	46.875					
Bag check-in arrival (1 minute):	1.5625		1	1.5625	2	0
Arrival rate per person (seconds):	38.4		2	1.5625	2	0
			3	1.5625	2	0
Bag check in rate (seconds):	30		4	1.5625	2	0
Number of people per check in:	1		5	1.5625	2	0
Queue clearing time (per person):	30		6	1.5625	2	0
			7	1.5625	2	0
			8	1.5625	2	0
People processing rate (per minute):	2		9	1.5625	2	0
			10	1.5625	2	0
			11	1.5625	2	0
			12	1.5625	2	0
			13	1.5625	2	0
			14	1.5625	2	0
			15	1.5625	2	0
			16	1.5625	2	0
			17	1.5625	2	0
			18	1.5625	2	0
			19	1.5625	2	0
			20	1.5625	2	0
			21	1.5625	2	0
			22	1.5625	2	0
			23	1.5625	2	0
			24	1.5625	2	0
			25	1.5625	2	0
			26	1.5625	2	0
			27	1.5625	2	0
			28	1.5625	2	0
			29	1.5625	2	0
			30	1.5625	2	0
				46.875	60	

ANNEXE 2: VISITOR MANAGEMENT STRATEGY ADDENDUM

**United Kingdom Holocaust Memorial
and Learning Centre**

Visitor Management Strategy
Addendum
April 2019

The Secretary of State for Housing Communities and Local Government

**UNITED KINGDOM HOLOCAUST MEMORIAL
AND LEARNING CENTRE**

VISITOR MANAGEMENT STRATEGY ADDENDUM

April 2019

AMENDMENTS TO PLANNING APPLICATION REF. 19/00114/FUL

Introduction

Revisions are proposed to the UK Holocaust Memorial and Learning Centre planning application following consideration of the consultation responses received from local residents, local amenity groups and statutory consultees.

The following amendments have been made to the scheme:

- Revised design for the Entrance Pavilion to reduce its height with a lighter and more transparent appearance;
- Adjustments to the design of the Memorial Courtyard and associated landscaping;
- Rationalisation of the Learning Centre basement footprint;
- Extension of the Learning Centre basement mezzanine level; and
- Repositioning of the skylight within the landscape.

Addendum

The proposed changes set out above will not materially alter the Visitor Management Strategy for the UK Holocaust Memorial and Learning Centre as submitted with the application in December 2018.

The revised design, footprint and layout of the Entrance Pavilion will contain the same functions in respect of ticket checks, security checks, bag drop off and collection and information point.

The operational management, ticketing strategy, visitor flow and gardens capacity would not be affected by the proposed changes.

**ANNEXE 3: RESPONSE TO COMMITTEE'S NOTE ON UNDERTAKINGS, RECOMMENDATIONS
AND ASSURANCES**

Annexe 3

Holocaust Memorial Bill: House of Lords Select Committee

Undertakings, Recommendations and Assurances

This Appendix sets out the Promoter's response to the Select Committee's note to the Promoter, *Undertakings, Recommendations and Assurances*, received on 06 December 2024. For full context and understanding, it should be read in conjunction with the main body of this document.

In some instances the Committee's note refers to a proposed undertaking rather than an assurance. In most of those cases the Promoter considers that an assurance is the appropriate form of commitment rather than an undertaking, as the matters concerned are not in the Promoter's sole control or gift. Further comment in that respect is included below.

- 1. We seek an assurance from the Promoter that during the construction of the proposed HMLC interference with the children's playground at the south end of VTG is kept to a minimum.**

Promoter's comments:

The Promoter will be content to give an assurance along the following lines. The precise text of the assurance will be given further consideration, but will reflect the following points:

- The playground will be kept open for as long as practically and safely possible during the construction of the Holocaust Memorial and Learning Centre.
- During the construction phase, while the playground is open, hoardings will surround the main construction work and care will be taken to avoid any mud or dust reaching the playground from the construction site.
- Closure of the playground will be needed at certain stages of the construction programme, both to enable works to take place on the site of the playground (including construction of the refreshment kiosk and of the new playground itself) and to ensure the safety of playground users when works take place nearby.
- While the playground is open during the construction phase, level access will be maintained from the gate at the northern end of the Gardens (via the riverside path) as well as access via the steps at the south of the Gardens on the western end of Lambeth Bridge.
- During the construction phase the Promoter will require contractors to share with users of the Gardens and the local community information about the progress of construction with planned closures discussed in advance.

2. **We are particularly concerned that insufficient attention has been devoted to the issue of young children in the playground being in close proximity to adults visiting the proposed HMLC, whether exiting from HMLC or using the public toilets and the proposed relocated kiosk. We seek an assurance that detailed consideration will be given by the Promoter to this issue, and in particular as to how visitors to the HMLC can be kept separate from those seeking to use the playground.**

Promoter's comments:

The Promoter will be content to give an assurance along the following lines. The precise text of the assurance will be given further consideration, but will reflect the following points:

- The intention is that the boundaries of the playground should be very clearly delineated, using the Spicer Memorial, hedges and other planting to make the playground space very clearly separate from the area around the Memorial.
- Visitors to the Memorial would have no need to pass through the playground.
- Visitors to VTG, whether visiting the Memorial or not, will have no need to pass through the playground in order to access either the public toilets or the refreshment kiosk.

3. **Unless there is some overriding necessity for the proposed relocated kiosk, we recommend that, in order to create more space and avoid attracting people into that area who are not wishing to use the playground, the Secretary of State should remove it from the present plans for the proposed HMLC.**

Promoter's comments

The Promoter's intention has been, and remains, to provide a refreshments kiosk that will be available for all users of VTG including visitors to the playground and to the HMLC.

A refreshment kiosk is currently in place in VTG. The kiosk was previously operated under a franchise issued by The Royal Parks for many years. The existing kiosk closed in the autumn of 2019 and reopened for the summer season in 2021, before closing again in September 2021.

Throughout the design process, an important aim of the HMLC programme has been to enable all current activities in VTG to continue after construction of the HMLC. Re-provision of the refreshments kiosk has been proposed in that light and it therefore forms part of the planning application currently awaiting redetermination.

Questions were raised at the planning inquiry by the Thorney Island Society as to whether users of the 'café' would overcrowd the playground. The Inspector addressed this in the context of wider conclusions on the impact on VTG at paragraph 15.210 of his report.

Baroness Deech and other petitioners have raised questions about the propriety of having a refreshments kiosk close to the HMLC or in VTG generally. The Promoter notes that there are refreshments facilities provided at or near other memorials, including: cafeterias at Yad Vashem, and at the US Holocaust Memorial Museum; a tea room at the National Holocaust Centre and Museum in Nottinghamshire; and the Serpentine Bar & Kitchen is reasonably close to the Memorial in Hyde Park.

4. It is a matter of concern that, after construction of the currently proposed project, those wishing to gain access to, and use, the playground will have to mingle with very large numbers of people visiting and exiting from the proposed HMLC especially if visitors to the HMLC are required to queue on any of the paths. We are also concerned that those who wish to use VTG for ordinary recreational purposes but cannot navigate steps will have to mingle with very large numbers of people visiting the proposed HMLC at the northern entry point. We seek an assurance that detailed consideration will be given by the Promoter to these issues.

Promoter's comments:

The Promoter will be content to give an assurance along the following lines. The precise text of the assurance will be given further consideration, but will reflect the following points:

- The Promoter has no intention of closing any of the existing gates providing access to VTG. Visitors to the playground will therefore be able to enter VTG at the southern gate from Millbank, directly into the playground.
- Similarly, visitors to VTG who are not intending to use the playground or to visit the HMLC will be free to enter via any of the gates from Millbank, as now.
- The visitor management strategy developed by the Promoter is intended to ensure that queues do not build up outside the entrance pavilion to the HMLC. Modelling of the expected peak levels of HMLC visitors (3,000 per day entering the HMLC and 7,000 per day entering VTG to see the Memorial) has indicated that there are no issues with pedestrian flow at the entrances to the gardens, the entrance to the Entrance Pavilion, or with the capacity of VTG in terms of crowding.

5. We seek an assurance from the Promoter that it will be investigated whether before and after construction of the proposed HMLC that, instead of access to the playground through the gate at the north end, there can be a step free access point closer to the playground at the southern end of VTG.

Promoter's comments:

The Promoter will be content to give an assurance along the following lines. The precise text of the assurance will be given further consideration, but will reflect the following points:

- Although closure of the southern gate from Millbank into VTG will be required at some points during the construction stage, the Promoter will seek to maintain safe access through that gate for as much time as possible.
- The Promoter has no intention of permanently closing any of the existing gates providing access to VTG. Visitors to the playground will therefore be able to enter VTG at the southern gate from Millbank, directly into the playground.

6. As to the use of VTG generally for normal recreational use during the construction period, we require the following assurance (which was offered to the Select Committee in the House of Commons, but not taken up by that Committee):

The Promoter will ensure, so far as reasonably practicable and health and safety considerations allow but excepting factors beyond the Promoter's control (such as adverse weather conditions), that restrictions on access by the public to Victoria Tower Gardens will be kept to a minimum and that, in particular, the Promoter will keep a footpath along the River Thames open during the construction period whenever reasonably practicable. The Promoter will require any contractor appointed to construct a Holocaust Memorial and Learning Centre to adhere to that assurance.

Promoter's comments:

The Promoter will be content to give this assurance but would wish the assurance to include the same qualification as was expressed in the assurance proffered to the House of Commons Select Committee that these measures are intended to supplement any actions required to be taken under conditions attached to any planning permission rather than to replace them; and that should there be any conflict between this assurance and the requirements of any planning condition, the requirements of the planning condition would take precedence.

7. We seek the following assurance (which was offered to the Select Committee in the House of Commons, but not taken up by that Committee):

Although clause 2 of the Bill applies to the whole of Victoria Tower Gardens, the Promoter will only site the permanent buildings and other structures comprising a Holocaust Memorial and Learning Centre and its ancillary facilities ("the permanent elements") in, on, under and over land:

(a) coloured blue and/or edged in blue on the attached plan (which is in accordance with the siting of the permanent elements proposed by the current planning application awaiting re-determination); or

(b) that is permitted by a planning permission for any other (i.e. modified or replacement) scheme for a Holocaust Memorial and Learning Centre for the siting of the permanent elements.

Promoter's comments:

The Promoter will be content to give an assurance along these lines but wishes to provide revised wording so that the assurance refers specifically to the planning application currently under consideration. By using the planning application itself as the core basis for the assurance, rather than solely with reference to a plan illustrating the scheme, the Promoter hopes to reduce the risk of uncertainty over the area of VTG covered by the assurance.

The revised wording is as follows:

- 1. The Promoter will only site the permanent buildings and other permanent structures comprising a Holocaust Memorial and Learning Centre and its ancillary facilities ("the permanent elements") on, under and over the land:*

- (a) *permitted by any planning permission that is granted by the Secretary of State under section 77 of the Town and Country Planning Act 1990 on the application made to Westminster City Council and given the reference 19/00114/FULL (the land proposed in that application for the siting of the permanent elements being shown coloured blue and edged in blue on the attached plan); or*
 - (b) *permitted by any planning permission for an altered, modified or replacement scheme for a Holocaust Memorial and Learning Centre.*
2. *In paragraph 1(b), “planning permission” means a planning permission granted under the Town and Country Planning Act 1990, a planning permission changed in accordance with section 96A of that Act, or a planning permission modified by a further planning permission granted under section 73 or 73A of that Act.*
 3. *The Promoter will require any contractor appointed to construct a Holocaust Memorial and Learning Centre to adhere to the undertaking given in paragraph 1.*

The plan referred to would be the same plan as was appended to the draft assurance proffered to the House of Commons Select Committee.

8. **We seek an assurance that consideration will be given the Promoter to widening the path between the HMLC or any security fencing and the Buxton Memorial to allow for the easier passage of people and a better view of the Memorial, preferably to 8 metres.**

Promoter’s comments:

The Promoter is content to give an assurance that consideration will be given to the question of how easily visitors will be able to pass by the Buxton Memorial.

Current plans (as illustrated on the plan at **Annexe 6**), however, provide for a path more than 5m wide alongside the Buxton Memorial. According to the results of modelling, even on days when the maximum number of visitors to HMLC are in VTG there is no expectation of unacceptable crowding anywhere within the Gardens.

9. **We were informed by the Promoter’s solicitors that security checks will take place only on visitors wishing to access the entrance pavilion, and that there is no intention to restrict access to other areas of VTG or to carry out security checks on users of VTG who are not intending to visit the HMLC. We seek an undertaking from the Promoter to that effect.**

Promoter’s comments:

The Promoter is not able to undertake to the Committee on these matters because issues relating to the wider parts of VTG are not within its control. The Promoter is, however, content to give an assurance that there is no intention to carry out security checks on visitors to VTG who do not intend to enter the HMLC, and no intention to restrict access to other areas of VTG. The security arrangements proposed for the HMLC which reflect these intentions have been based on expert advice from the Metropolitan Police Service and the National Protective Security Authority (NPSA).

Any such commitment could clearly not relate to operational decisions taken by the Metropolitan Police or any other party, and could not account for security risks or threats which may arise in

connection with, for example, the Palace of Westminster or other institutions or events taking place locally.

- 10. Some petitioners wish the Bill to be amended to set a limit on the amount of time that VTG can be closed to the public in any one year in consequence of events associated with the proposed HMLC. This is a matter which particularly affects residents who habitually visit and use VTG for relaxation and enjoyment. We recommend that this be taken forward by the Promoter with Royal Parks, which is and will be the body responsible for maintenance of those parts of the VTG outside the perimeter of the Holocaust Memorial.**

Promoter's comments:

The Promoter agrees that it will be important for all users of VTG, including local residents, to continue to have access to the Gardens.

The Promoter would wish to emphasise that the Bill does not remove, except in relation to a HMLC, the requirement of section 8 of the London County Council (Improvements) Act 1900 that VTG should be maintained as a garden open to the public.

The Promoter would expect that the body responsible for operating the HMLC will need to develop a strong working relationship with the body responsible for maintaining VTG (currently The Royal Parks) in order to co-ordinate matters including arrangements for the few events (such as Holocaust Memorial Day) when full or partial closures of VTG may be needed. The Promoter intends to work with DCMS (as landowner) in order to put in place effective arrangements for co-ordination between the two bodies.

- 11. We recommend that consideration be given by the Secretary of State to amending the Bill so as to provide that the protection of VTG by the 1900 Act should continue to apply to any part of the Gardens not taken up with a Holocaust museum and learning centre, including the current proposed project, after it has been fully completed and open to the public.**

Promoter's comments:

The Promoter considers that no amendment is necessary to make this provision.

This is because the Bill as drafted already ensures that the protection of the 1900 Act continues to apply across the whole of VTG except in relation to the construction, maintenance and operation of a HMLC.

The Promoter is also content to give an assurance in relation to the siting of any HMLC within VTG - see paragraph 7 above.

12. We require an undertaking that, on the revival of the planning application, the Promoter will take detailed account in the preparation of its plans of any changes in security considerations since the matter was considered by the Inspector at the public inquiry into the planning application. especially the increase in terrorism threats.

Promoter's comments:

The Promoter will be content to give the following undertaking :

- 1. Following re-activation by the Secretary of State, under Rule 19(1)(a) of The Town and Country Planning (Inquiries Procedure) (England) Rules 2000, of the planning process in relation to the application made to Westminster City Council and given the reference 19/00114/FULL, the Promoter will make representations to the Secretary of State in relation to security considerations and in so doing will provide updated evidence on security considerations with the aim of ensuring that the Secretary of State continues to regard security considerations as a main issue in determination of the application.*
- 2. Before submitting to the Secretary of State any representations on security considerations, the Promoter will consult with the Corporate Officer of the House of Commons and the Corporate Officer of the House of Lords, Community Security Trust, the Metropolitan Police, the National Protective Security Authority and Westminster City Council and will have regard to any comments they may make to the Promoter on security considerations.*

13. We recommend that the Secretary of State gives serious consideration to amending the Bill along the lines of Lord Carlile's draft security amendments or something similar.

Promoter's comments:

The Promoter will give serious consideration to the recommendation. The Promoter's initial views are that the Promoter does not believe that an amendment to the Bill along the lines proposed would be either necessary or desirable.

As the Committee is aware, the planning application must be re-determined. As part of the planning application security information was submitted and made available to the counterterrorism and crime reduction teams supporting Westminster City Council as local planning authority (WCC). As a result, neither WCC, nor its advisers, have objected to this aspect of the proposal.

Nevertheless, parties with an interest in the security arrangements, including the Palace of Westminster, will have formal opportunities to comment further on the planning application and to propose any conditions to the Minister responsible for the planning decision. In this regard, the Promoter understands that the Palace of Westminster has already engaged with the redetermination process through correspondence with the planning casework unit. A copy of this correspondence is provided at **Annexe 5**.

The proposed amendment is therefore squarely concerned with matters which properly fall to be dealt with as part of the ordinary planning process, and which have already been the subject of significant detailed consideration by WCC and the independent planning inspector who both concluded that security considerations were neutral in character and did not indicate that the refusal of the planning application would be justified on this basis.

Moreover, extensive references have been made by petitioners to the programme of restoration and renewal (“R&R”) of the Palace of Westminster. R&R is the subject of specific legislation in the Parliamentary Buildings (Restoration and Renewal) Act 2019 which does not treat security in any special way notwithstanding the direct relationship to the sensitive parliamentary estate.

Section 2(5) of the 2019 Act obliges the sponsor body for R&R, in carrying out its functions, to have regard to safety and security issues. This demonstrates that Parliament thought about safety and security matters when considering the bill relating to R&R, but did not consider it necessary to make special provision supplementing, or replacing, the normal planning process.

The Promoter considers that there is no reason why the kind of more onerous supplementary provision proposed by Lord Carlile should now be made in relation to the HMLC, noting once more that the Bill does not in itself authorise or grant consent or planning permission for the construction, operation or use of the HMLC – clause 2 is concerned solely with the relaxation of the restriction in section 8 of the 1900 Act.

14. The Promoter should provide an undertaking that a permanent independent body will be established to operate and run the proposed HMLC or indeed any other holocaust memorial and learning centre in VTG, whose remit will be limited to the area occupied by the HMLC, on the assumption that Royal Parks will continue to oversee the remainder of VTG.

Promoter’s comments:

The Promoter is not able to undertake to the Committee on these matters because the detailed policy concerned is still being developed and therefore there is currently insufficient certainty. The Promoter will, however, be content to give an assurance broadly along the following lines. The precise text of the assurance will be given further consideration, but will reflect the following points:

- The Prime Minister’s Holocaust Commission proposed that a permanent, independent body should be established to operate and run the HMLC.
- Decisions on the precise form and function of this operating body have not yet been taken, but the Promoter has no plans for any new body to take on wider responsibility for the management and maintenance of VTG beyond that part of VTG occupied by the HMLC (the wider VTG).
- The Promoter fully recognises the importance of close co-operation between the body responsible for operating the HMLC and the body responsible for managing the wider VTG.
- In deciding on the form and function of the operating body, the Promoter will need to consider wider government policies and objectives relating to the creation, funding and operation of public bodies. It would be premature to give undertakings which may limit the range of options considered.
- The Promoter will continue to acknowledge the importance of the statutory duties under section 8(1) and (8) of the London County Council (Improvements) Act 1900 remaining in full force and effect in relation to the wider VTG, responsibility for which rests with the Secretary of State for Culture, Media and Sport (DCMS). The Promoter does not wish to limit the ability of the SoS DCMS to exercise that responsibility.
- The Promoter will seek to ensure that the two bodies (whatever their form and function) co-operate within a framework which enables each to pursue their distinct objectives unimpeded.

- 15. We recommend that before any further planning approval is sought for the proposed HMLC detailed consideration be given as to how the construction and operation of the proposed HMLC and R&R will interact with each other, accommodate the use of VTG by nearby residents and their children and grandchildren and affect the passage of traffic along Horseferry Road.**

Promoter's comments:

The Promoter agrees that co-ordination between the HMLC and R&R programmes is essential. Liaison between the two programmes already takes place and the Promoter fully intends to support continued close working.

The Promoter agrees that the interests of users of VTG need to be given attention throughout the planning of work on HMLC including when seeking to co-ordinate plans with the R&R programme.

Parties with an interest in the use of VTG, including Westminster City Council and local amenity societies (such as those societies who have petitioned against the Bill) will have opportunities through the reactivated planning process relating to the HMLC, and on any planning applications which may be made in the future in relation to the R&R programme, to make representations in relation to the interaction between the HMLC and R&R programmes.

**ANNEXE 4: LETTER FROM LORDS AND COMMONS CORPORATE OFFICERS TO PLANNING
CASEWORK UNIT**

Emma Hopkins
Planning Casework Unit
Ministry of Housing, Communities & Local Government
3rd floor, Fry Building
2 Marsham Street
London SW1P 4DF

Email: PCC@communities.gov.uk

5 November 2024

Dear Ms Hopkins,

VICTORIA TOWER GARDENS, MILLBANK, LONDON, SW1P 3YB
APPLICATION REF: 19/00114/FULL
UK PARLIAMENT REPRESENTATIONS

1. Thank you for letter dated 2 October 2024 (ref: APP/XF990/V/19/3240661) and the opportunity to make representations in relation to Application 19/00114/FULL.
2. This response is sent on behalf of the Corporate Officer of the House of Commons and the Corporate Officer of the House of Lords ("the Corporate Officers") who each has power to hold property, enter into contracts and do other things on behalf of the Commons and Lords respectively. The Corporate Officers understand that you are seeking written representations in relation to the matters set out in paragraph 3(a) and (b) of your letter:
 - (a) The Holocaust Memorial Bill including the effect of the Bill on (i) the appropriate timing of the redetermination of the called-in application, and (ii) any procedural implications arising from the introduction of the Holocaust Memorial Bill and the finding as regards its hybridity;

UK Parliament
Palace of Westminster
Westminster
London SW1A 0AA

kendallg@parliament.uk

(b) the likely timing of the delivery of the application proposal in comparison with alternative sites in light of the Order issued by the Court of Appeal on 20 July 2022, refusing permission to appeal the High Court judgment of 8 April 2022 which quashed the decision of the Minister of State for Housing contained in his letter dated 29 July 2021 in which he granted planning permission for the above proposal.

3. In relation to matter (a), the Corporate Officers consider that the redetermination of the planning application should be postponed until after the Holocaust Memorial Bill has come into force, following its enactment. It is feasible that the Bill will be amended during its passage through Parliament which may materially affect the planning process and representations that the Corporate Officers may wish to make. Even if the Bill is not amended, the legal obstacle presented by section 8 of the London County Council (Amendment) Act 1900 will remain in place until the Bill has received Royal Assent and come into effect.
4. It is also possible that undertakings will be given by the promoters of the Bill during its passage through Parliament which will affect the planning process.
5. In relation to matter (b), the Corporate Officers are not in a position to comment on the timing of the delivery of the Holocaust Memorial and Learning Centre as per the original planning application proposal in comparison with other sites, assuming that (i) the Bill is enacted in its current form, and (ii) the application is approved under the re-opened process.
6. The Corporate Officers intend to make representations prior to the redetermination of the planning application as provided for in rule 19 of the Town and Country Planning (Inquiries Procedure) (England) Rules 2000; and therefore request that, as soon as the redetermination process is initiated, you send them the written statement specified in rule 19(1)(a).

7. Your letter dated 2 October 2024 was incorrectly addressed with the result that there was delay in passing it to the appropriate person. Please would you update the contact details you hold for us to ensure this does not happen again. The correct details are as follows:

UK Parliament
C/O Gemma Kendall, Senior Town Planning Manager
5th Floor/64VS
House of Commons
London
SW1A 0AA

Email: kendallg@parliament.uk

Telephone: 07821 696127

Yours sincerely,



Andy Helliwell

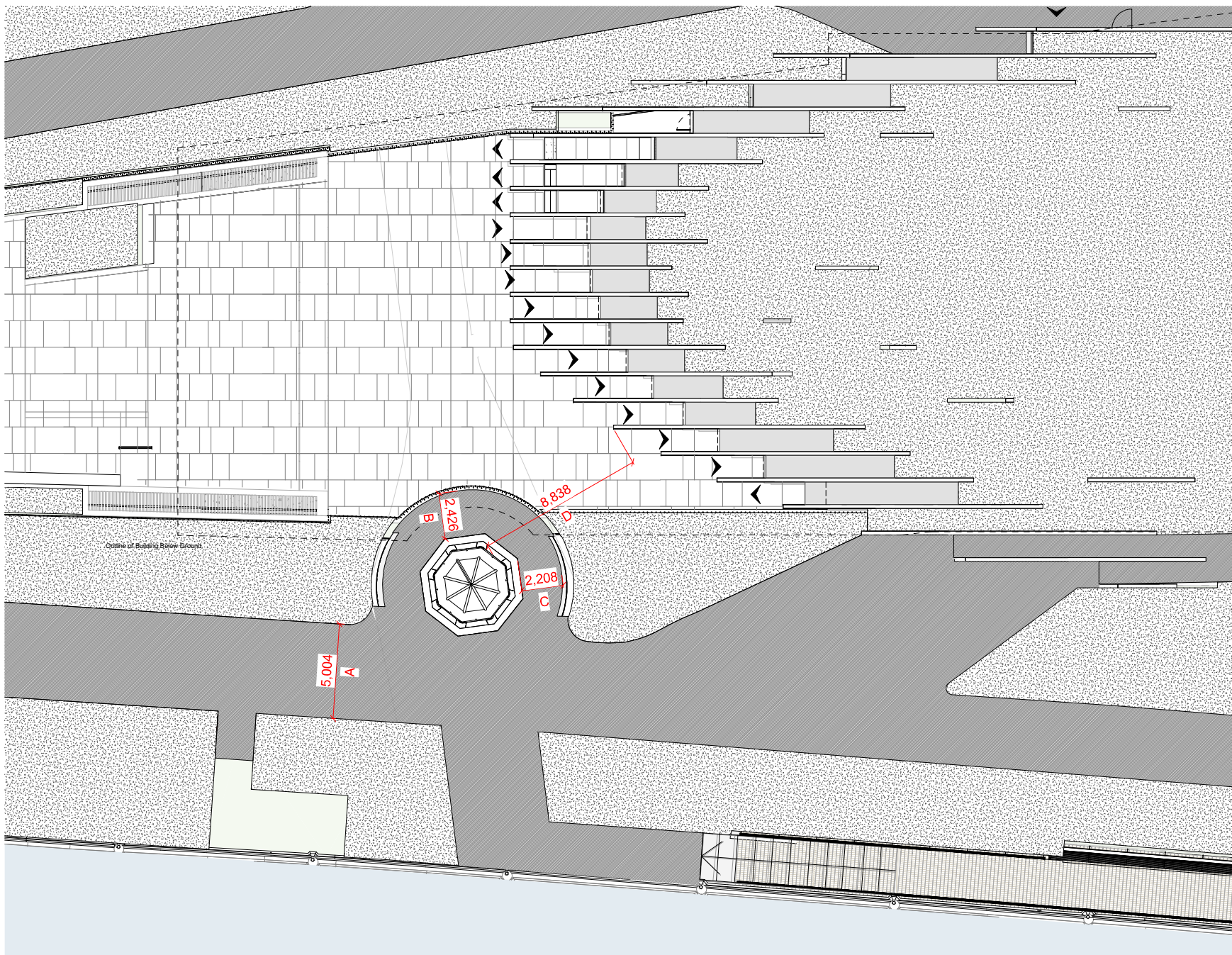
Chief Operating Officer, House of Lords, for and on behalf of the Corporate Officer of the House of Lords



Chris Elliott

Managing Director, Strategic Estates, for and on behalf of the Corporate Officer of the House of Commons

ANNEXE 5: PLAN SHOWING DISTANCES FROM BUXTON MEMORIAL



1 Proposed Roof Level
1 : 100

Measures' Description:

- A: path alongside Buxton Memorial (5.004m)
- B: shortest distance from BM to railings (2.426m)
- C: shortest distance from BM to edge of bench (2.208m)
- D: shortest distance from BM to fins (8.838m)

General Notes:
Drawing to be read in conjunction with the specification and all relevant drawings.
Do not scale from this drawing.
Contractor to check all dimensions on site. Adjaye Associates to be advised of any discrepancies between this drawing and site conditions immediately.

Revision	Date	Description	Rev.:
D2		ISSUED FOR TENDER	
Client: United Kingdom Holocaust Memorial Foundation Project: National Holocaust Memorial			
Drawing Title: Buxton Memorial distances			
Drawing No.: UKHM-AA-AA-03-509			
Scale: 1 : 100 @ A1		Drawn By: AA	
Date:		Checked By: AA	

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