

Meeting of the

STRATEGIC DEVELOPMENT COMMITTEE

Thursday, 15 March 2007 at 7.30 p.m.

A G E N D A

VENUE

Council Chamber, 1st Floor, Town Hall, Mulberry Place, 5 Clove Crescent, London, E14 2BG (If the business below is not completed on 15th March, the meeting will be adjourned to 20th March 2007)

Members:	Deputies (if any):
Chair: Councillor Rofique U Ahmed	
Vice-Chair: Councillor Alibor Choudhury	
Councillor Ohid Ahmed	Councillor Anwara Ali, (Designated Deputy for Councillors Ohid Ahmed, Alibor Choudhury, Ahmed Omer and Joshua Peck)
Councillor Louise Alexander	Councillor Stephanie Eaton, (Designated Deputy for Councillor Louise Alexander)
Councillor Rupert Eckhardt	Councillor Carli Harper-Penman, (Designated Deputy for Councillors Ohid Ahmed, Joshua Peck, Ahmed Omer and Alibor Choudhury)
Councillor Ahmed Hussain	Councillor Sirajul Islam, (Designated Deputy for Councillors Ohid Ahmed, Alibor Choudhury, Ahmed Omer and Joshua Peck)
Councillor Abjol Miah	Councillor Waiseul Islam, (Designated Deputy for Councillors Ahmed Hussain
Councillor Ahmed Adam Omer	
Councillor Joshua Peck	

and Abjol Miah)
Councillor Rania Khan, (Designated
Deputy for Councillors Ahmed Hussain
and Abjol Miah)
Councillor M. Mamun Rashid, (Designated
Deputy for Councillors Ahmed Hussain
and Abjol Miah)
Councillor Simon Rouse, (Designated
Deputy for Councillor Rupert Eckhardt)

[Note: The quorum for this body is 3 Members].

If you require any further information relating to this meeting, would like to request a large print, Braille or audio version of this document, or would like to discuss access arrangements or any other special requirements, please contact: Louise Fleming, Democratic Services, Tel: 020 7364 4878, E-mail: louise.fleming@towerhamlets.gov.uk

LONDON BOROUGH OF TOWER HAMLETS
STRATEGIC DEVELOPMENT COMMITTEE

Thursday, 15 March 2007

7.30 p.m.

1. APOLOGIES FOR ABSENCE

To receive any apologies for absence.

2. DECLARATIONS OF INTEREST

To note any declarations of interest made by Members, including those restricting Members from voting on the questions detailed in Section 106 of the Local Government Finance Act, 1992.

Note from the Chief Executive

In accordance with the Council's Code of Conduct, Members must declare any **personal interests** they have in any item on the agenda or as they arise during the course of the meeting. Members must orally indicate to which item their interest relates. If a Member has a personal interest he/she must also consider whether or not that interest is a **prejudicial personal interest** and take the necessary action. When considering whether or not they have a declarable interest, Members should consult pages 181 to 184 of the Council's Constitution. Please note that all Members present at a Committee meeting (in whatever capacity) are required to declare any personal or prejudicial interests.

A **personal interest** is, generally, one that would affect a Member (either directly or through a connection with a relevant person or organisation) more than other people in London, in respect of the item of business under consideration at the meeting. If a member of the public, knowing all the relevant facts, would view a Member's personal interest in the item under consideration as so substantial that it would appear likely to prejudice the Member's judgement of the public interest, then the Member has a **prejudicial personal interest**.

Consequences:

- If a Member has a **personal interest**: he/she must declare the interest but can stay, speak and vote.
- If the Member has **prejudicial personal interest**: he/she must declare the interest, cannot speak or vote on the item and must leave the room.

When declaring an interest, Members are requested to specify the nature of the interest, the particular agenda item to which the interest relates and to also specify whether the interest is of a personal or personal and prejudicial nature. This procedure is designed to assist the public's understanding of the meeting and is also designed to enable a full entry to be made in the Statutory Register of Interests which is kept by the Head of Democratic Renewal and Engagement on behalf of the Monitoring Officer.

	PAGE NUMBER	WARD(S) AFFECTED
3. UNRESTRICTED MINUTES		
To confirm as a correct record of the proceedings the unrestricted minutes of the ordinary meeting of the Strategic Development Committee held on 13 th February 2007.	1 - 6	
4. RECOMMENDATIONS		
4.1 To NOTE that the Chair has agreed to the submission of the Update Report of the Head of Development Decisions in accordance with the urgency provisions at Section 100B(4) of the Local Government Act 1972 to ensure Members have before them all the relevant facts and information about the planning applications set out in the agenda.		
4.2 To RESOLVE that, in the event of amendments to recommendations being made by the Committee, the task of formalising the wording of any amendments be delegated to the Head of Development Decisions along the broad lines indicated at the meeting.		
5. PROCEDURE FOR HEARING OBJECTIONS		
To NOTE the procedure for hearing objections at meetings of the Strategic Development Committee.	7 - 8	
6. PLANNING APPLICATIONS FOR DECISION	9 - 10	
6 .1 Olympic Applications	11 - 138	Bow East
6 .2 48-52 Thomas Road, London E14 7BJ	139 - 158	Mile End East
6 .3 22 Marsh Wall, London E14	159 - 184	Millwall

LONDON BOROUGH OF TOWER HAMLETS

MINUTES OF THE STRATEGIC DEVELOPMENT COMMITTEE

HELD AT 7.30 P.M. ON TUESDAY, 13 FEBRUARY 2007

**COUNCIL CHAMBER, 1ST FLOOR, TOWN HALL, MULBERRY PLACE, 5 CLOVE
CRESCENT, LONDON, E14 2BG**

Members Present:

Councillor Rofique U Ahmed (Chair)

Councillor Ohid Ahmed

Councillor Alibor Choudhury (Vice-Chair)

Councillor Rupert Eckhardt

Councillor Abjol Miah

Councillor Ahmed Adam Omer

Councillor Joshua Peck

Other Councillors Present:

Officers Present:

Richard Finch	– (Team Leader, Strategic Transport Development)
Renee Goodwin	– (Acting Applications Manager)
Michael Kiely	– (Service Head, Development Decisions)
Neil Weeks	– (Legal Advisor)
Winnie Gasca	– (Democratic Services)

1. APOLOGIES FOR ABSENCE

None received.

2. DECLARATIONS OF INTEREST

Councillor Rupert Eckhardt declared a personal interest in item 6.1 as the ward member for Millwall.

3. UNRESTRICTED MINUTES

The minutes of the meetings held on 16th November 2006 and 18th January 2007 were agreed and approved as a correct record.

4. RECOMMENDATIONS

- 4.1 The Committee NOTED that the Chair had agreed to the submission of the Update Report of the Head of Development Decisions in accordance with urgency provisions at Section 100B(4) of the Local Government Act 1972 to ensure Members had before them all relevant facts and information about the planning applications set out in the agenda.
- 4.2 The Committee RESOLVED that, in the event of amendments to recommendations being made by the Committee, the task of formalising the wording of any amendments be delegated to the Head of Development Decisions along the broad lines indicated at the meeting.

5. PROCEDURE FOR HEARING OBJECTIONS

The Committee noted the procedure for hearing objections and those who had registered to speak.

6. PLANNING APPLICATIONS FOR DECISION

6.1 Delta Junction DLR, Land At Under DLR South Of Aspen Way West India Quay DLR Canary Wharf DLR, Aspen Way, London

Mr Michael Kiely, Head of Development Decisions, presented the report and informed the Committee that it was requested to delegate power to the Corporate Director of Development and Renewal to determine the development of Delta Junction Docklands Light Railway (DLR), Land At Under DLR South Of Aspen Way West India Quay DLR Canary Wharf DLR, Aspen Way, London. The development would consist of:

1. Rebuilding viaduct on existing columns.
2. Building new viaduct under the Delta Junction
3. Building new viaduct "tie-in" to the railway between West India Quay and Canary Wharf stations.
4. Demolition of existing viaduct and columns.
5. Diversion of utilities required for the construction of new columns.

Mr Michael Kiely informed Members of the background of the application, that a Transport & Works Act order (TWA) gave power for the Secretary of State for Transport to authorise by order certain types of infrastructure project that had previously been authorised by Act of Parliament. The types of project covered by the TWA included railways, tramways, inland waterways and works which interfered with rights of navigation. The Transport and Works (Applications and Objections Procedure) (England and Wales) Rules 2000 ("the Applications Rules") made under sections 6, 6A, 7 and 10 of the TWA

set out the procedural requirements for those who wished to apply for or object to proposed orders.

Council officers had been negotiating a draft legal agreement with the DLR to ensure that any environmental and traffic impacts from the works resulting from the proposed DLR Transport & Works Act (TWA) (Capacity Enhancement and 2012 Games Preparation) order were mitigated as far as possible for local residents. A decision was made by Full Council on 13th December 2006 to delegate the completion of the legal agreement to the Corporate Director of Development & Renewal.

However, this related planning application (PA/06/02121) had been received by the Council which also formed part of the above TWA Order. Therefore, the Corporate Director of Development & Renewal considered that it would not be appropriate to conclude negotiations on the legal agreement with the DLR until the Council's position on the planning application had been clarified and any outstanding issues resolved by the DLR to the satisfaction of the planning authority.

The TWA inquiry had been set for the 20th February 2007 and the Council needed to determine its position in relation to the inquiry. The undetermined application created a problem in that by adopting a particular position at the inquiry the Council could be seen to be fettering its position as the Local Planning Authority.

The planning application was subject to an EIA and the procedures associated with that meant that the Council were not yet in a position to determine the application. Moreover, there was enough clarity around the substantive issues to enable the report to be presented to Members to enable them to delegate the determination of the application by the Corporate Director of Development and Renewal. The decision would enable officers to prepare for the inquiry.

Councillor Shirley Houghton, on behalf of her constituents in the ward of Millwall, informed Members that the Environmental Statement (ES) was missing from the report and as it had not been made available to the residents and businesses in the locality, they had not been fully consulted nor had they been given the opportunity to digest the information.

She further suggested that the report was not clear on the maximum number of night time working 'exceptions'; whether it was 5 per week or 5 in total. Officers confirmed that it was 5 'work-nights' in total.

In reference to the Grade 1 listed Banana Wall Councillor Houghton submitted that stringent conditions were essential due to the cumulative effects the new viaduct could cause.

Ms Renee Goodwin, Strategic Applications Manager, informed the Members that the upgrade was critical for the 2012 Olympic Games and that therefore

there were timetable considerations for the commencement of the development.

In reference to the ES, this was submitted with the application and subject to consultation. A draft analysis of it had been submitted to officers by the Council's consultants. Any amendments to the ES would be subject to public consultation before any decision was made.

With reference to the Banana Wall, Ms Goodwin informed the Members that it would be protected and the issue of vibrations would be included into the conditions.

Ms Goodwin further advised the Members that the main issues were the impact on the DLR network and construction effects. The developments were to improve the DLR capacity by 50% for journeys to/from Canary Wharf, on the Bank, Stratford, Lewisham, London City and Woolwich Arsenal DLR Lines. The benefit extended to Tower Hamlets and London as a whole in comparison to the limited number of passengers who were to be affected.

The Committee raised concern over the impact on residents who relied on the service of West India Quay Station.

Mr Richard Finch, Strategic Transport Development Team Leader, advised that only West India Quay DLR station passengers heading southbound from Bank in the morning and evening peaks (Monday – Friday) would be affected and that they could alight and change trains at Canary Wharf, which in total would constitute a delay of no more than 3 minutes, or travel to Poplar and travel back to West India Quay DLR station which would add a maximum of an extra 4 minutes to journey times.

The Committee RESOLVED that the Corporate Director of Development and Renewal be given delegated powers to determine the application for DLR development works, comprising of:

1. Rebuilding viaduct of existing columns;
2. Building new viaduct under the Delta Junction;
3. Building new viaduct "tie-in" to the railway between West India Quay and Canary Wharf stations;
4. Demolition of existing viaduct and columns; and
5. Diversion of utilities required for the construction of new columns

at Delta Junction DLR, Land at under DLR South of Aspen Way West India Quay DLR Canary Wharf DLR, Aspen Way, London.

Conditions:

1. A condition is included to ensure that the maximum number of night time works is specified.
2. The delegated report that is produced for the determination of this application includes an explicit analysis of the impact on residents

using the West India Quay Station during peak times (Monday – Friday) southbound DLR services on the Bank-Lewisham branch.

The meeting ended at 8:10p.m.

Chair, Councillor Rofique U Ahmed
Strategic Development Committee

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Agenda Item 5

DEVELOPMENT COMMITTEE STRATEGIC DEVELOPMENT COMMITTEE OLYMPICS DEVELOPMENT COMMITTEE

PROCEDURE FOR HEARING OBJECTIONS AT COMMITTEE MEETINGS

- 1) When a planning application is reported on the agenda as a Planning Application for Decision at one of the Council's Development Committees, objectors and the applicant/supporters will be able to address that Committee on any planning issues raised by the application, provided that they follow the procedures set out below.
- 2) For each planning application up to two objectors can address the Committee for up to three minutes each. The applicant or his/her supporter can address the Committee for an equivalent time to that allocated for objectors (ie 3 or 6 minutes).
- 3) All requests to address a Committee meeting should be confirmed in writing or by e-mail to the Committee Clerk by 4pm on the Friday prior to the meeting. This communication should confirm the details of the intended spokesperson and include contact telephone numbers. The Clerk will not accept requests before the agenda has been published. For objectors, the allocation of slots will be on a first come, first served basis. For the applicant, the clerk will advise after 4pm on the Friday prior to the meeting whether his/her slot is 3 or 6 minutes long. This slot can be used for supporters or other persons that the applicant wishes to present the application to the Committee.
- 4) The order for addressing committee will be:
 - a) Objector(s)
 - b) The applicant or supporter(s)
 - c) Non-committee Member(s) wishing to address the committee (limited to 3 minutes each)
- 5) These will all be verbal presentations only. The distribution of additional material or information to Members at the Committee is not permitted.
- 6) At the close of a speaker's address the person must take no further part in the proceedings of the meeting, unless directed by the Chair of the Committee.
- 7) Committee members, at the discretion of the Chair, may ask questions of any spokesperson on points of clarification only.
- 8) Where a planning application has been recommended for approval by officers and the applicant or his/her supporter has requested to speak but there are no objectors or non-committee members registered to speak, the Chair will ask the Committee if any Member wishes to speak against the application. If no Member indicates that they wish to speak against the recommendation, then the applicant or their supporter(s) will not be expected to address the Committee.
- 9) The Chair has the ability, at his/her discretion, to vary these procedures where there are exceptional circumstances or in the interests of natural justice.

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Agenda Item 6

Committee: Strategic Development	Date: 15 th March 2007	Classification: Unrestricted	Agenda Item No: 6
Report of: Corporate Director of Development and Renewal		Title: Planning Applications for Decision	
Originating Officer: Michael Kiely		Ref No: See reports attached for each item	
		Ward(s): See reports attached for each item	

1. INTRODUCTION

- 1.1 In this part of the agenda are reports on planning applications for determination by the Committee. The following information and advice applies to all those reports.

2. FURTHER INFORMATION

- 2.1 Members are informed that all letters of representation and petitions received in relation to the items on this part of the agenda are available for inspection at the meeting.
- 2.2 Members are informed that any further letters of representation, petitions or other matters received since the publication of this part of the agenda, concerning items on it, will be reported to the committee in an update report.

3. ADVICE OF ASSISTANT CHIEF EXECUTIVE (LEGAL SERVICES)

- 3.1 The relevant policy framework against which the Committee is required to consider planning applications includes the adopted Tower Hamlets Unitary Development Plan 1998 (UDP), the adopted London Plan 2004, the Council's Community Plan, the Draft Local Development Framework and Interim Planning Guidance Notes.
- 3.2 Decisions must be taken in accordance with sections 54A and 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004. Section 70(2) of the Town and Country Planning Act 1990 is particularly relevant, as it requires the Committee to have regard to the provisions of the Development Plan, so far as material to the application and any other material considerations.
- 3.3 Under Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, in considering whether to grant planning permission for development which affects listed buildings or their settings, the local planning authority must have special regard to the desirability of preserving the building or its setting or any features of architectural or historic interest it possesses.
- 3.4 Under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, in considering whether to grant planning permission for development which affects a conservation area, the local planning authority must pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area.
- 3.5 Whilst the adopted UDP 1998 is the statutory development plan for the Borough (along with the London Plan), it will be replaced by a more up to date set of plan documents which will make up the Local Development Framework (LDF). As the replacement plan documents

LOCAL GOVERNMENT ACT 2000 (Section 97) LIST OF BACKGROUND PAPERS USED IN THE DRAFTING OF THIS REPORT

Brief Description of background papers: Tick if copy supplied for register

Name and telephone no. of holder:

Application, plans, adopted UDP. draft
LDF and London Plan

See reports attached for each item

progress towards adoption, they will gain increasing status as a material consideration in the determination of planning applications.

- 3.6 The reports take account not only of the policies in the statutory UDP 1998 but also the emerging plan, which reflect more closely current Council and London-wide policy and guidance.
- 3.7 In accordance with Article 22 of the General Development Procedure Order 1995, Members are invited to agree the recommendations set out in the reports, which have been made on the basis of the analysis of the scheme set out in each report. This analysis has been undertaken on the balance of the policies and any other material considerations set out in the individual reports.

Agenda Item 6.1

Committee: Strategic Development	Date: 15 th March 2007	Classification: Unrestricted	Agenda Item No: 6.1
Report of: Corporate Director of Development and Renewal		Title: Planning Application for Decision	
Case Officer: Rachel Blackwell		Ref No: PA/07/00218 & PA/07/00345	
		Ward: Bow East	

APPLICATION DETAILS

This report considers three separate applications submitted by the Olympic Delivery Authority. The applications are described as follows:

1. Site Preparation Planning Application
2. Olympic, Paralympic and Legacy Transformation Planning Application
3. Olympic Village (part) and Legacy Residential Planning Application

Location: **1./2. Site Preparation / Olympic, Paralympic and Legacy Transformation Planning Applications** – For a full description of the site location and relevant site plan please refer to **Appendix A**.

The site as it relates to the London Borough of Tower Hamlets includes:- *to the west by the A12 Blackwall Tunnel Northern Approach Road (part) the River Lea and the River Lea Navigation (Hackney Cut) and land on the western bank of the River Lea to the east of the A12 East Cross Route.*

3. Olympic Village (part) and Legacy Residential Planning Application (Located within the LB Newham) – For a full description of the site location and relevant site plan please refer to **Appendix A**.

Existing Use: **1./2. Site Preparation / Olympic, Paralympic and Legacy Transformation Planning Applications** – Number of uses, including industrial, storage, transportation, open space, residential and ancillary uses. The site also includes a significant amount of vacant and derelict land.

3. Olympic Village (part) and Legacy Residential Planning Application (Located within the LB Newham) – Residential, student and traveller accommodation in the process of being vacated pursuant to the Olympic Compulsory Purchase Order.

Proposal: For a full description of the proposals and the relevant proposals map for both the Olympic and Paralympic and the Olympic Village (part) and Legacy Residential Planning Application sites please refer to **Appendix B**.

Drawing/Document Nos: For a full list of documents submitted with the applications please refer to **Appendix C**.

LOCAL GOVERNMENT ACT 2000 (Section 97)

LIST OF BACKGROUND PAPERS USED IN THE DRAFTING OF THIS REPORT

Brief Description of background papers:	Tick if copy supplied for register	Name and telephone no. of holder:
Application, plans, adopted UDP. draft LDF and London Plan		Rachel Blackwell 020 7364 0436

Applicant: 1./2. **Site Preparation / Olympic, Paralympic and Legacy Transformation Planning Applications** - Olympic Delivery Authority
C/- EDAW

3. Olympic Village (part) and Legacy Residential Planning Application – Mr N McNevin C/- Olympic Delivery Authority

Owner: London Development Agency

Historic Building: N/A

Conservation Area: N/A

1. RECOMMENDATION

- 1.1 The ODA Planning Decisions Team should consider the views and issues of the London Borough of Tower Hamlets set out in the (Draft) Observations Letter to the ODA attached as **Appendix L**.
- 1.2 That the **Corporate Director of Development and Renewal** be given **delegated powers** to make further observations and/or recommendations (as necessary) to the ODA.

2.0 SUMMARY OF MATERIAL PLANNING CONSIDERATIONS

Introduction

- 2.1 These applications have been submitted to the Planning Committee of the Olympic Delivery Authority (ODA). Following the enactment of the Olympic and Paralympic Games Act 2006, the ODA is the determining Authority for planning applications in the area.
- 2.2 Following approval it is intended that the Olympic, Paralympic and Legacy Transformation Planning Applications (current applications) will supersede the 2004 permission.
- 2.3 The London 2012 Olympic and Paralympic Games will provide a unique opportunity for the London Borough of Tower Hamlets. This opportunity can be expressed in four principles that are aligned with the Community Plan. These are:
 - *Creating and Sharing Prosperity* – bringing investment and employment into the Borough and ensuring that all residents and businesses are in a position to benefit from, and contribute to, growing economic prosperity as a result of the Games.
 - *A Socially Cohesive Community* – celebrating the rich cultural diversity of local communities; strengthening community networks and organisations; and enabling the community to develop as a whole.
 - *A Transformed Environment* – ensuring that the alluring physical transformation anticipated in the Olympic Park is matched with the physical transformation within Tower Hamlets.
 - *The London 2012 Olympic and Paralympic Games Experience* – providing every Tower Hamlets resident with an opportunity to have a Games experience, whether participating, volunteering, or being a spectator.
- 2.4 The purpose of this report is for the London Borough of Tower Hamlets to provide observations on the proposals to the Planning Decisions Team at the Olympic Delivery Authority to assist in the assessment of the applications.

2.5 The London Borough of Tower Hamlets has considered the particular circumstance of this application against the Council's approved planning policies contained in the London Borough of Tower Hamlets Unitary Development Plan, associated supplementary planning guidance, the London Plan and Government Planning Policy Guidance and has found that:

- In principle the London Borough of Tower Hamlets is supportive of the Olympics and Legacy Development Proposals. However it is considered vital that more emphasis is placed on the establishment of legacy communities and connectivity with existing surrounding communities.
- It is recommended that further work be carried out on the design and layout of the site for legacy purposes in order to ensure that these communities are appropriately designed to achieve the long term sustainable regeneration of the area. This would involve the establishment of linkages with the surrounding area and the use of these linkages in perpetuity.
- Inappropriate land bridge type connection back from the Greenway to the northwest of the railway line linking Tower Hamlets with the Olympic Park and Stratford Town Centre. Despite the construction of a major land bridge, uninterrupted pedestrian and cycle traffic along the entire Greenway will not be achieved.
- Currently the site is isolated by river and road networks. The lack of connectivity and safety concerns with the existing links is required to be addressed through improvements including bridges. The proposed bridges from the park to other parts of Fish Island and Bow are temporary with no firm commitment to make them permanent beyond the lifetime of the games. Without firm commitment for improved links Tower Hamlets residents would be isolated from the facilities within the Olympic Park and at Stratford City.
- Generally, it is felt that the renewables and CO₂ emission reduction targets should be raised higher than 20%. This is to reflect future targets of Zero Carbon developments.
- Guarantees should be sought to ensure that the design and proposed operation (i.e. traffic, hours of operation and noise emissions) of the Energy Centre respect the future residential/ community focus of this part of Fish Island.
- An appropriate conditions and Section 106 (or other relevant legal agreement) package must be established to ensure that the various mitigation measures and commitment to the delivery of facilities and infrastructure during the games and in legacy are secured.

2.6 A copy of the London Borough of Tower Hamlets observations letter to the ODA is provided at **Appendix L**.

3.0 PLANNING CONTEXT & HISTORY

3.1 The original planning permission for the Olympics and Legacy Development was granted in December 2004.

3.2 The 2004 permissions comprise five approvals that were considered by the relevant London Borough Council's as Local Planning Authorities. The scope of these applications is described in the table provided at **Appendix D**.

3.3 Since December 2004 the Olympic and Legacy Masterplans have been revised to maximise legacy benefits and secure a more efficient and functional layout. The content of the current applications is generally the same as the 2004 approval, revisions result in the requirement for

new planning permission to be secured.

- 3.4 The master plan changes since 2004 are summarised at **Appendix E**.
- 3.5 The applicants state that masterplan changes have been driven by:
- Opportunities to maximise legacy benefits from Olympic investment;
 - Changes to the Olympic venue requirements;
 - Sustainability considerations;
 - Changing security requirements,;
 - Deliverability considerations, and;
 - Cost.
- 3.6 Following approval it is intended that the Olympic, Paralympic and Legacy Transformation Planning Applications (current applications) will supersede the 2004 permission.
- 3.7 Other relevant permissions include:
- *Planning permission for under grounding the overhead power lines* - Planning permission for the construction of two tunnels and associated infrastructure to enable under grounding of the power lines and thus allow removal of the overhead lines and pylons were granted by the London Borough of Newham on the 6th January 2006(Ref: 05/004/FUL) and Hackney on the 10th January 2006 (Ref: 2005/2524). Works have commenced.
 - *Planning permission for rail carriage sidings facility at Lea interchange* - Planning permission for the development of rail carriage sidings and related facilities at the Lea interchange in the LB Waltham Forrest immediately to the north of the Olympic Park was granted on the 3rd August 2006.
 - *Planning permission for Stratford City* - a major mixed use development on the former Stratford Rail lands was granted by the LB Newham on the 17th February 2005. This permission provides for access to the Olympic, Paralympic and legacy transformation applications site from the Stratford Regional and International Stations and from Stratford town centre. The remediation of this site and the construction of Stratford international station were previously approved as part of the Channel Tunnel Rail Link works.
 - *Planning permission for works to increase the capacity of Stratford Regional Station* - granted by the planning committee of the ODA in November 2006
- 3.8 *Lower Lea Valley, Olympic and legacy Compulsory Purchase Order*
The London Development Agency (LDA) is responsible for securing the land required for the development of Olympic facilities and their legacy transformation within the application sites. The London Development Agency (Lower Lea Valley Olympic and Legacy) Compulsory Purchase Order (CPO) was made on the 3rd November 2005. This order is to be used by the LDA to acquire land in cases where agreement cannot be reached with landowners. By the end of December 2006 over 90 per cent of land within the application sites has been acquired by the LDA in agreement with landowners.

Olympic Planning Applications Strategy

- 3.9 There are four phases to the development of the Olympic Park, including:
- **Phase 1 - The Olympic Construction Phase** – the period that begins the bulk earthwork and remediation and other site preparation work. It includes the construction of venues, facilities and infrastructure relating to the Olympic and Paralympic games.
 - **Phase 2 - The Olympic and Paralympic Games Phase** – the period beginning with the start of rehearsal events for the Olympic Games and ending with the closing ceremony of the Paralympic games.
 - **Phase 3 – The Legacy Transformation Phase** – the period starting after the Paralympic games closing ceremony and ending when all elements of the Olympic

development have been removed and modified and additional construction undertaken in connection with the legacy.

- **Phase 4 – The Legacy Phase** – the period when the legacy transformed venues are brought into use and form the context for legacy communities' development within the Olympic park.

4.0 THE SITE

4.1 The planning application boundary is the same for both applications, refer to **Appendix A**. The site area within the planning application boundary is approximately 246 hectares (606 acres). A full description of the site and surrounding area is provided at **Appendix F**

4.2 For the purposes of the application the site has been divided into a number of Planning Delivery Zones (1-15) and 4 further areas:

1. Stadium Park (Planning Delivery Zones 3, 4 (LBTH) and 8).
2. Aquatic Centre & Environs (Planning Delivery Zones 1, 2, and part 9).
3. Hackney Wick (Planning Delivery Zone 5).
4. Sports Park (Planning Delivery Zones 6, 7 and 15).

A plan identifying the Planning Delivery Zones is provided at **Appendix G**.

Area 1 - Stadium Park (Planning Delivery Zones 3, 4 (LBTH) and 8). Sites 4 & 14 located within the London Borough of Tower Hamlets

4.3 Planning Delivery Zone 4 lies to the east of the River Lea Navigation Canal (Hackney Cut) and to the west of the River Lea. It includes the Kings Yard area which contains a number of existing buildings, one of which will be converted and along with an annex and new building will provide space for the Energy Centre.

4.4 Planning Delivery Zone 14 lies to the west of the River Lea Navigation; this site is presently used as a railhead and is proposed to be used for accreditation checking and associated facilities during the games and revert to a railhead thereafter.

5. PROPOSAL

The Olympic, Paralympic and Legacy Transformation Planning Applications

5.1 The applications seek planning permission for the development and use of facilities associated with the summer Olympic and Paralympic games and the subsequent legacy transformation. The boroughs affected by these applications include the London Boroughs of Hackney, Newham, Tower Hamlets and Waltham Forrester.

1. Site Preparation Planning Application

5.2 The site preparation application involves the following elements:

- **Demolition** - The application drawings detail existing buildings and other structures that are proposed to be demolished or retained.
- **Remediation** - The application contains proposals for the remediation of land within the Olympic park. Remediation works would provide a development platform for construction and operation of venues and infrastructure associated with the Olympic and Paralympic games and legacy developments.
- **Earthworks** - The topographical levels achieved at the site preparation phase are known as formation levels, which will seek to create a stable formation platform,

including new ground contours, and batter slopes across the Olympic park to cater for development.

- *Construction Roads* - A number of construction roads would be located across the site to facilitate the development of the Olympic park. The drawings allow roads to deviate from the centre of the indicative roads to provide for flexibility to road layout during construction.
- *Bridges Required by Construction* - A total of seven (7) temporary construction bridges are required.
- *Temporary Construction Worker Accommodation* - A temporary construction workers compound may be required on the Olympic Park site during construction. This compound would seek to house up to 250 workers with associated facilities. (This accommodation would not be located within the London Borough of Tower Hamlets).
- *Waterway Works* - It is intended to extend the wetland corridor associated with the River Lea and the Lea Valley Park, South to the Thames. The site preparation application seeks permission for all works to waterways within the site.
- *Olympic Route Road* - The site preparation application contains proposals for new highways works including junctions and comprises the Olympic Loop Road which also includes permanent hard standing for car parking and pick up and set down areas.
- *Highways works* - In order for the Olympic works to take place it is necessary to seek the closure of some roads and public rights of way. The proposed closures are detailed in Figure 5 of the transport assessment.
- *Utilities* - The construction of a utilities trench contained within a utilities corridor which will contain the major utilities such as gas, electricity, water, sewerage, drainage, telecommunications and diversions for all existing utilities within the Olympics site.

2. Facilities and their Legacy Transformation Planning Application

5.3 The Facilities and their Legacy Transformation Application involves the following elements:

- *Earthworks* - Reinforced soil slopes are included to achieve the wider strategic aspirations for the Olympic Park.
- *Spectator Support & Accreditation Checking Areas* - Proposals will include areas of hard standing including covered areas, including canopies, tents and port-o-cabins for temporary facilities to be used for spectator support and accreditation checking areas during the Olympic and Paralympic games. (Accreditation checking areas which are proposed on Site 14, with the London Borough of Tower Hamlets will generally consist of covered areas to provide for the checking and accreditation of visitor to the Olympic Park during the games).
- *Highways*- An indicative Legacy Transformation Road Layout has been submitted.
- *Open Space* - The application involves the details of the reconfiguration of existing open space and the extent of proposed open space in the Olympic and legacy phases of development.
- *Sports Venues* - The application includes proposals for venues and associated ancillary areas. All details on the Olympic and legacy components are submitted in outline. The layout, scale, appearance, access and landscaping are reserved matters.
- *Competition Stadium or Arena* - Each of the venues is indicated on the applications drawings with a minimum and maximum building footprint. The building envelope is expressed in terms of length, width and height limits and allows for roof overhang where necessary. Heights quoted are above finished ground level, unless otherwise indicated. A minimum and maximum gross internal floor area is detailed in the description of development. (The Arena would be located within the LB of Newham but would be visible from the east of the London Borough of Tower Hamlets).
- *Warm Up Areas* - The athlete warm up areas would comprise specifically designed hard standing areas which include covered areas.
- *Front of House* - The front of house areas lie between the venues and the main Olympic concourse and circulation areas of the park. These areas have been sized to

allow for general circulation and will include areas for spectator support services.

- *Back of House* - The back of house facilities would be generally located behind the venues adjacent to the loop road to allow for ease of access. A majority of these structures would be temporary tents, trailers or modular units.
- *Sports Venues – Legacy Phase* - The warm up areas, front of house and back of house will be removed/reduced after the Olympics so that only the legacy venue remains.
- *Bridges* - Parameters define the minimum and maximum extent of bridge decks and abutments. Plans and elevations show the minimum and maximum span, width, height above water/rail/road/towpath/footpath and a description of the bridge carriageway. Details such as materials are reserved for future determination.
- *Above Ground Utility Structures* - Outline permission is sought for the construction of an energy centre to include CCHP and Biomass plan (to be located within the London Borough of Tower Hamlets).

Main Stadium

- 5.4 The Main Stadium with the Olympic Cauldron and associated warm-up tracks, along with the Basketball Arena to the north of it, are located at the heart of the Olympic Park in Delivery Zone 3. The Stadium, along with the Cauldron will act as a main reference point for visitors, visible throughout the Park and the wider area including to residents of Tower Hamlets.
- 5.5 The Main Stadium within the LB Newham, will be located on the Marshgate Lane site within Planning Delivery Zone 3, it will be connected to the rest of the Olympic Park via a series of footbridges linking the stadium site to the main concourse.
- 5.6 The Main Stadium will remain as a focus of the Legacy venues. The immediate surroundings will become part of the Legacy parklands. The land bridge will remain, providing connections linking the Park to the Greenway and to the south, forming part of the green link to the River Thames from the Lea Valley Park.

Basketball Arena – Located within the London Borough of Tower Hamlets

- 5.7 To the north of the Stadium, the basketball arena, a temporary venue, will be located with the Olympic Loop Road to the west and with direct access to the concourse to the east.
- 5.8 The Basketball Arena (temporary) will have a minimum built footprint of 9,170sqm and maximum built footprint of 12,950sqm, and a minimum floor space area of 8,250sqm and a maximum floor space area of 9,170sqm. Back of House requirements to support the Basketball Arena will be temporary and are in the order of 23,310sqm, warm up area of around 1,800sqm, training and support facilities and a venue specific front house area of approximately 10,300sqm.
- 5.9 After the Games the area of the basketball arena will be available for 'Legacy Communities' development, connected to the residential areas to the west via a number of bridges.

Energy Centre – Located within the London Borough of Tower Hamlets

- 5.10 The Energy Centre will be located in Kings Yard, with an associated Substation, in the northern part of Planning Delivery Zone 4. Part of this area will also be occupied by spectator services during the games.
- 5.11 The size of the Energy Centre is based on the technical capacity for the size of infrastructure required to provide a CHP plant, biomass boilers and cooling towers to provide heating and cooling to the Olympic Park as well as heating to the Stratford City development. It will be located in the Kings Yard area and will be formed from the conversion and extension of an existing building, as well as a new building. The new building will have a minimum floor space of 9,540sqm and a maximum floor space of 10,275sqm. The annex to the existing building will

have a minimum floor space of 240sqm and a maximum floor space of 305sqm. The Electricity Sub-Station located alongside the Energy Centre will have a minimum floor space of 940sqm and a maximum floor space of 1120sqm.

- 5.12 In legacy the energy centre will remain to provide heating and cooling to the proposed legacy development and Stratford City. The area previously occupied by spectator services at Kings Yard will be converted for employment use.

Other Services – Located within the London Borough of Tower Hamlets

- 5.13 There are also a number of additional structures located within Planning Delivery Zones 3 & 4 including Spectator Services buildings 11, 12 and 13, Telecommunications Masts and associated cabins as well as foul and surface water pumping stations.
- 5.14 The Telecommunications masts and cabins will have the following space requirements with a minimum floor space of 54sqm and a maximum floor space of 80sqm to meet operational requirements. There would be one telecommunication mast located within the London Borough of Tower Hamlets, to the north of site 14; this telecommunication mast would be a permanent structure to be retained in legacy.
- 5.15 The areas dedicated to visitor Accreditation Checking (including Site 14 within LBTH) areas will become Legacy development sites, with the exception of that on Fish Island (site 14) which will be returned to its existing use as a rail head.
- 5.16 In due course it is anticipated that planning permission will also be sought for the development of the Non Olympic Legacy Proposals known as the ‘*Legacy Communities*,’ including residential, commercial and community uses and associated infrastructure additional to the Legacy Transformation Olympic Facilities.

3. Olympic Village (part) and Legacy Residential Planning Application

- 5.17 Outline consent is sought for: The redevelopment of Clays Lane Estate Stratford (part) for up to 1252 permanent residential units that will also be used for athlete and related accommodation in connection with the 2012 Olympic Games and Paralympic Games complementary retail facilities (Use Class A1-A5) associated open space and play facilities, car parking, servicing facilities, vehicular access and ancillary works. A full description of development is provided at **Appendix H**.

6. POLICY FRAMEWORK

- 6.1 For details of the status of relevant policies see the front sheet for “Planning Applications for Determination” agenda items. The following policies are relevant to the application at it relates to the London Borough of Tower Hamlets:

Unitary Development Plan

Proposals:		Industrial Employment Areas Green Chain Lea Valley Regional Park Area of Archaeological Search
Policies:	DEV1 DEV2 DEV7 DEV8 DEV45	Design Requirements Environmental Requirements Protection of Strategic Views Protection of Local Views Development in Area of Archaeological Interest

DEV46	Protection of Waterway Corridors
DEV48	Strategic Riverside Walkways and New Development
DEV51	Soil Tests
DEV55	Development & Waste Disposal
DEV56	Waste Recycling
DEV63	Designation of Green Chains
DEV69	Efficient Use of Water
EMP1	Encouraging new employment uses
EMP2	Retaining Existing Employment Uses
EMP5	Compatibility with Existing industrial uses
EMP6	Employing Local People
HSG3	Affordable Housing
T7	The road hierarchy
T8	New roads
T9	Strategic restraint
T10	Priorities for strategic Management
T20	Strategic Pedestrian routes
T21	Pedestrian Needs in New Development
T22	Strategic cycle network
OS14	Lea Valley Regional Park

Emerging Local Development Framework

Proposals:	CP10	Strategic Industrial Location
	CP6	Olympic Area
	LS4	Development Sites (Fish Island South – Industrial Employment (B1c, B2, B8 uses)
	CP33	Sites of Importance of Nature Conservation
	CP36	Blue Ribbon Network
	CP37	Flood Risk Area
	CP34	Draft Crossrail Safeguarding
		Green Chain
		Lea Valley Regional Park

Core Strategies:	IMP1	Planning Obligations
	CP1	Creating Sustainable Communities
	CP2	Equal Opportunity
	CP3	Sustainable Environment
	CP4	Good Design
	CP5	Supporting Infrastructure
	CP6	A Sustainable Legacy from the 2012 Olympics
	CP10	Strategic Industrial Locations
	CP11	Sites in Employment Use
	CP30	Improving the Quality and Quantity of Open Spaces
	CP31	Biodiversity
	CP34	Green Chains
	CP35	Lea Valley Regional Park
	CP36	The Water Environment & Waterside Walkways
	CP37	Flood Alleviation
	CP38	Energy Efficiency and Production of Renewable Energy
	CP39	Sustainable Waste Management
	CP40	A Sustainable Transport Network
	CP41	Integrating Development with Transport
	CP42	Streets for People
	CP45	The Road Hierarchy
	CP46	Accessible and Inclusive Environments
	CP47	Community Safety
	CP48	Tall Buildings

CP49 Historic Environment
CP50 Important Views

Leaside Area Action Plan

Proposals: LS2 Fish Island East - residential (C3), open space, primary school, social and community facilities, employment (B1)
Fish Island South - industrial employment (B1c, B2, B8)
Policy LS4 (part) Leaside Spatial Strategy

Spatial Development Strategy for Greater London (London Plan)

Policy 3A.7 Affordable Housing Targets
Policy 3A.8 Negotiating Affordable Housing in Individual Private Residential and Mixed Use Schemes
Policy 3C.2 Matching Development to Transport Capacity
Policy 3B.10 Development of sustainable tourism including the Olympic & Paralympic Games (Proposed Alteration to London Plan)
Policy 3D.7 Realising the value of open space
Policy 3D.9 Metropolitan Open Land
Policy 3D.12 Biodiversity & Nature Conservation
Policy 4A.1 Waste Strategic Policy Targets
Policy 4A.6 Improving Air Quality
Policy 4A.7 Energy Efficiency and Renewable Energy
Policy 4A.9 Providing for Renewable Energy
Policy 4A.10 Supporting the Provision of Renewable Energy
Policy 4A.11 Water supplies
Policy 4A.12 Water Quality
Policy 4A.16 Bringing Contaminated land back into beneficial use
Policy 4B.1 Design Principles for a compact city
Policy 4B.2 Promoting world class architecture and design
Policy 4B.3 Maximising the potential of sites
Policy 4B.4 Enhancing the Quality of the Public realm
Policy 4B.5 Creating an inclusive environment
Policy 4B.6 Sustainable Design and construction
Policy 4B.7 Respect Local context and communities
Policy 4B.8 Tall buildings, location
Policy 4B9 Large scale buildings, design and impact
Policy 4B.14 Archaeology
Policy 4C.1 The strategic importance of the blue ribbon network
Policy 4C.2 Context for sustainable growth
Policy 4C.3 The natural value of the blue ribbon network
Policy 4C.8 Sustainable Drainage
Policy 4C.12 Sustainable growth priorities for the blue ribbon network
Policy 4C.14 Freight uses on the blue ribbon network
Policy 4C.17 Increasing access alongside and to the blue ribbon network
Policy 4C.20 Design Starting from the water

Lower Lea Valley Opportunity Area Planning Framework (draft)

Core Theme A: A water City
Core Theme B: Thriving Centres
Core Theme C: Neighbourhood & Communities
Core Theme D: The Working Valley
Core Theme E: A Connected Valley
Core Theme F: A Sustainable & Enduring Legacy
Core Theme G: Reaping the Benefits of the Olympic Investment

Government Planning Policy Guidance/Statements

PPS1 Generally Policy and Principles

PPS3	Housing
PPS6	Planning for Town Centres
PPS9	Biodiversity & Geological Conservation
PPG13	Transport
PPG16	Archaeology & Planning
PPG17	Planning for Open Space, Sport and Recreation
PPS22	Renewable Energy
PPS23	Planning & Pollution Control
PPS25	Development & Flood Risk
PPG24	Planning & Noise
PPS1	Delivering Sustainable Development

Community Plan The following Community Plan objectives relate to the application:

- A better place for living safely
- A better place for living well
- A better place for creating and sharing prosperity
- A better place for learning, achievement and leisure
- A better place for excellent public services

7. PRINCIPLE STRATEGIC ISSUES

7.1 The principle strategic issues raised by the application that must be considered are:

1. Commitment to Sustainable Regeneration
2. Urban Design & Connectivity
3. Open Space
4. Sustainable Environment
5. Renewable Energy & Sustainable Waste Management
6. Traffic & Transportation
7. Other

Introduction

7.2 The Olympic and Paralympic Games and their legacy has the potential to profoundly impact upon the future of the local (and global) environment as well as the quality of life for those who live, work, learn and recreate in Tower Hamlets. The Games should provide a unique catalyst for regeneration in East London. It will act as a showcase and must not only comply with policy priorities to provide sustainable benefits to Tower Hamlets residents and businesses, but act as an exemplar for other developments in the Lea Valley and beyond to emulate.

7.3 The proposal has the potential to successfully implement a range of national, regional and local regeneration priorities. Core Policy CP6 of the London Borough of Tower Hamlets Emerging Local Development Framework (LDF) states that *“the Council will proactively support the 2012 Games to harness the benefits and manage impacts of the Games and deliver a positive legacy for Tower Hamlets.”* Among other issues the policy seeks the development of accessible job creation and places great emphasis on high quality urban design that balances both accessibility and security.

7.4 Similarly, the Leaside Area Action Plan (AAP) Spatial Strategy (L1) states that *“the Council’s aim to capitalise in the Games as a catalyst for regeneration to deliver: new employment opportunities, improved urban design, more housing (including family homes), and improved environmental standards.”* Policy L11 identifies Fish Island East and Fish Island South for Olympic uses, which is reflected in the proposal. Importantly, the policy states that the council specifically promotes joint working with the ODA to assist in the regeneration of Fish Island.

Issue 1: Commitment to Sustainable Regeneration

Explanation:

- 7.5 The process being proposed in the current planning application is outlined in a document called the *Commitment to Sustainable Regeneration* (CSR). This states that proposals for the development (post 2013) of the London 2012 Olympic and Paralympic Games site in Stratford will be progressed over the forthcoming years, both in terms of content for developing and agreement of longer term development proposals with a wide range of stakeholders and local communities.
- 7.6 The CSR states that the OAPF incorporates the level of legacy development anticipated across the Olympic Park by the 2004 permission and the various transport, utility and environmental infrastructure improvements which flow from the existing permission. Consequently, the CSR makes the claim that plans for legacy communities in the Park are therefore firmly embedded in strategic policy for the Lower Lea Valley.
- 7.7 The CSR makes the commitment that: *'The ODA will consider the impact of changes in sustainability standards and targets on the Olympic Village and legacy communities, and will meet new standards where practicable'*. This should be contrasted with the more robust approach in the 2004 planning application's Sustainability Statement which foreshadowed that sustainability targets would become more demanding over time – what is best practice now may fall below best practice in future. The 2004 masterplan proposals aimed to place the Olympic Park legacy developments *'within the top 10% of developments of this size and nature in terms of exemplary targets'* (2004).

Issues for London Borough of Tower Hamlets:

- 7.8 The draft CSR issued to the 5 Host Boroughs stipulated a timetable for the Legacy Masterplan Framework process. This signalled that this would commence in early 2007 and terminate with full public consultation in late 2008. The current CSR does not contain commitments to a timeline. Given the deferral of the legacy applications themselves, this lack of certainty is a matter of concern.
- 7.9 Under park-wide infrastructure, it is stated that 'a large part of the loop road will be utilised in legacy'. This implies that much of the loop road in the current planning application may be temporary. More fundamentally however is that from an urban design perspective, the creation of a loop road would not be a sound approach to designing the area from the point of view of place making in legacy. Connecting the new area into existing communities, the permeability and connections within and between the new places that will be created (particularly to Stratford City across the park and the many barriers formed by rivers and rail) and the character that will be formed by the new roads and the building plots are all fundamental and vital elements in the success of this development as a sustainable form of regeneration. Although it is understood and accepted that a loop road is needed for the Games, such a road is an anathema to good urban design in legacy and therefore more clarity is sought on this issue.
- 7.10 There are contradictory messages about sustainability standards. Section 4 of the CSR states that: 'The legacy communities will be delivered having regard to best practice standards (as they pertain at the time) for emissions, energy and water consumption and production and will consider the potential impacts of climate change'. This is in contrast to the 'consider' and 'where practicable' criteria stated on page 12 (quoted above). The conclusion to the CSR states that: 'the legacy communities design process keeps pace with developments in sustainable development policy'. This position is far from the outcome target (top 10%) committed to in the 2004 application. In any event, the current commitments are merely adoption of current standards and do not seek to make the legacy exemplary.

View of the London Borough of Tower Hamlets

- 7.11 A number of stages in the process of taking forward the Legacy Masterplan Framework (LMF), such as the design competitions for the character areas and the development of an ODA/LDA community engagement strategy, require full borough participation. These comments are further elaborated upon throughout this report.

Legacy

Explanation:

- 7.12 The Olympic and legacy proposals set out a vision for regeneration, including a series of principles which seek to shape the identity and character of the legacy communities. However the most inadequate element of the proposal is the lack of apparent thought or certainty from the ODA regarding the Olympic Legacy. Firstly, agencies such as the Greater London Authority, the London Thames Gateway Urban Development Corporation and relevant boroughs have prepared extensive strategic planning and regeneration proposals for the Lower Lea Valley as a whole. This is represented in the policy framework set out in the Lower Lea Valley Opportunity Area Planning Framework (LLVOAPF) and associated Delivery and Implementation Strategy. The LLV OAPF sets out a range of policies to guide future regeneration including the identification of social and community infrastructure requirements. Furthermore a range of directions are provided regarding the preferred legacy land uses which include potential new housing and social infrastructure. The proposals have only partially reflected the legacy proposals set out as part of the application and fails to demonstrate how the objectives of the strategic planning and regeneration proposals for the Lower Lea Valley as a whole would be realised. More detail is required.
- 7.13 The Leaside AAP sets out a clear set of land use principles for the Legacy specifically site LS2 should include: Residential, primary school, social and community facilities, employment, public open space (Policy L16). These uses are based on detailed urban design and capacity assessments as well as the extant permission granted in 2004. Site designations are supported by design and built form principles including: allowing for pedestrian routes along the waterways, ensuring canal-side development maximise natural surveillance, promotes views along the waterways, promotes active frontage onto the waterways and retention and enhancement of historic buildings.

Issues for London Borough of Tower Hamlets

- 7.14 Much of the work set out in the proposal, including land decontamination, appears to provide a useful platform for delivering legacy development. However, it is unclear as to whether the level of remediation will facilitate the required future land uses including sensitive uses such as schools. Furthermore, the Park proposal includes an inner ring road running directly adjacent to the waterways. Such a road does not fit with the design principles for the area where buildings and infrastructure should interact sensitively with the waterways as set out in L15.

View of London Borough of Tower Hamlets

- 7.15 Given that regeneration and a positive legacy are primary aims of the 2012 Games the lack of commitment and the potential negative legacy are major concerns. These concerns could be addressed by:
- Producing a rigorous urban design analysis of the form the legacy communities development should take in order to provide well connected and sustainable communities and then demonstrating how the Olympics phase either provides that platform or if it cannot, how that platform will be provided in Olympic Legacy.
 - Revising the application to reflect the land use designations in the Leaside Area Action Plan and LLVOAPF.
 - Ensuring bridges to Tower Hamlets are built as permanent features that improve

- connectivity between the Olympic Park and Fish Island.
- Either alter the location of the inner ring road or ensure that it is a temporary feature that is removed as part of the deconstruction process.

Issue 2: Urban Design & Connectivity

Explanation:

- 7.16 As explained in the proposal section of this report a number of site wide principles will seek to inform the design of the site as a whole, including works to prepare the ground for the built environment, bridges, and land bridges to connect with the surrounding area.
- 7.17 The platform for the legacy will be permitted by this application. The layout of the site would influence the layout and character of the future community.
- 7.18 The design details of the proposals including the basketball stadium, the energy centre and temporary accreditation facilities within the London Borough of Tower Hamlets would be determined as reserved matters following the issue of any planning permission.
- 7.19 The main stadium and associated facilities which would have an overall height of approximately 90m, located within the London Borough of Newham to the east of the London Borough of Tower Hamlets boundary would be visible from much of the eastern portions of the borough. The Olympic Caldron, containing the flame, is anticipated to be a very tall structure (some 150 metres high) and therefore it will be a very dominant feature in the area. The basketball stadium, located within the London Borough of Tower Hamlets although a substantially smaller built form at 30m in height and temporary in nature would comprise a similar design to the main stadium.
- 7.20 The Energy Centre would be located to the west of the Olympic site to the north of the basketball arena. The energy centre is a permanent facility comprising a number of buildings. The scale, form, appearance, materials and colours seek to reflect the role and function of the building. The built form would comprise a three storey structure with an overall height of 20m (approx same height as a 6 storey residential building); the building would feature a 48m high stack (the same height as Nelson's Column), which would be visible from the surrounding area.

Issues for London Borough of Tower Hamlets

- 7.21 It is vital that the focus of redevelopment is on the legacy and not on the event of the Olympics and Paralympics. The proposal should be designed having regard to land use principles and design and layout which seeks the creation of sustainable communities. It would be a monumental lost opportunity if this was a development site which has been designed in isolation for a temporary event with little regard for surrounding communities and wider long term regeneration.

View of London Borough of Tower Hamlets

- 7.22 The road layout of the site and connectivity with surrounding communities is considered to be poor. The application needs to demonstrate legacy road layout for its future connection / integration with existing urban fabric and connectivity with the surrounding area, particularly facilities and amenities such as the new park, sporting facilities and Stratford City. The existing layout and schematic block plans proposed show primary routes and development parcels. It is understood that each site would be developed stage by stage, however it needs to be ensured that movement, and access to facilities and amenities are designed in response to the topography and constraints of the site and surrounding area.
- 7.23 Whilst the provision of a loop road is necessary for the functioning of the Olympics, the provision of such a piece of engineering would not take place if this site was being redeveloped without the Olympic event being held here. To show its virtual complete

retention in Olympic Legacy in these applications is surprising to say the least. The lack of any clear analysis of how the area should function in 2012+ in urban design terms is a fundamental weakness in these applications. To say that these details will follow in Legacy Communities is just not acceptable. If these planning permissions are granted in the form that they have been made, planning permission will exist for a network of roads that have been largely chosen because they suit the running of the Olympics from this location and not because they provide the necessary highway and servicing infrastructure to support the future development of these areas. This cannot be accepted for a regeneration project of the scale and importance of this.

- 7.24 Addressing this shortcoming in the application will be challenging and difficult at this late stage. The Council fully supports the Olympics and the success of that project for the country cannot be risked. The only way to address this issue is for the application to be amended so that the legacy elements are submitted as illustrative at this stage, and will therefore need to be submitted in detail following a proper urban design analysis of the legacy provision. The provision of the Olympics legacy framework of roads and bridges would be controlled through a Grampian condition linked to the first use of any of the retained facilities, such as the main stadium or the athletes' village. This would mean that the alteration of any permanent facility could not take place until the legacy proposals that are contained in this application have been submitted and approved and the facility could not be first used until the approved legacy proposals have been provided.
- 7.25 The access from the loop road from the London Borough of Tower Hamlets side is weak in legacy mode. Additional work is required to provide access to site 4 and 8. The London Borough of Tower Hamlets has major residential proposals along Wick Lane, Tredegar Road and Roman Road, and it would be of great benefit to have least one vehicular link all the way to the Olympics Stadium and parkland and more importantly extending along to the Aquatics centre and Stratford City.
- 7.26 The road infrastructure and access establishes the framework for the future urban form. It is difficult to envisage how the "leftover" spaces around the sports venues in legacy mode would be transformed into "places". The Design and Access statement refers to the Legacy Masterplan Framework (LMF) for the Olympics parks, which will determine the detail, scale and development form of the legacy communities. However it is considered vital that more details are provided at this stage in order to predict the needs of future communities. A spatial framework or urban structure should be prepared.
- 7.27 The London Borough of Tower Hamlets would seek to ensure that the design and built form of proposed buildings which requires the bulk, height and density of development to positively relate to surrounding building plots and blocks, and the scale of development in the surrounding area.

The Greenway

Explanation:

- 7.28 The Greenway is a strategic east-west route enabling Tower Hamlets residents to access the Olympic Park as well as the proposed legacy neighbourhoods. The planning application seeks permission for a land bridge (L04) to be constructed to link the Greenway to the Olympic Stadium and Aquatics Centre Area. This land bridge also links the Greenway in the London Borough of Tower Hamlets to the Olympic Stadium and park and the Stratford town centre and transport hub.

Issues for London Borough of Tower Hamlets:

- 7.29 There does not appear to be a proposal for a land bridge type connection back onto the Greenway to the northwest of the railway line as part of the application. Instead a long gradual slope (as required in order to achieve accessibility) is proposed towards the Olympic Stadium. This means that despite the construction of a major land bridge,

uninterrupted pedestrian and cycle traffic along the entire Greenway will not be achieved. It appears that the current solution requires pedestrians to:

- Leave the Greenway and continue their journey underneath the railway bridge along the road presently known as Marshgate Lane/Pudding Mill Lane or;
- Leave the Greenway, move along the bottom of the proposed land bridge slope and then access the land bridge to cross the railway.

7.30 Either of these two solutions is not ideal. In the first case it does not present an improvement on the current severance of the Greenway and the need to use the railway underpass. In the second scenario the need to backtrack along the slope and then move onto the land bridge extends the journey unnecessarily.

7.31 View of London Borough of Tower Hamlets

In order to provide the most benefit for pedestrians and cyclists accessing the Greenway from the western (Tower Hamlets) end, a solution should be designed that allows direct access to the land bridge on both the northwest and the southeast side of the railway

Footbridges Linking the London Borough of Tower Hamlets to the Olympic Park/connectivity

Explanation:

7.32 Connectivity will be a crucial factor in the sustainability of the Games. A number of temporary bridges are to be constructed along the western fringe of the Olympic Park providing access across the River Lea Navigation. Two of these bridges (T09 & T10) are located in Tower Hamlets. It is further proposed that these bridges are removed at the end of the Olympic and Paralympic Games and permanent bridges are to be constructed in their place. Apart from the Greenway, these bridges provide the only access for Tower Hamlets residents into the new Olympic Park.

Issues for London Borough of Tower Hamlets

7.33 Such a large development could act as a barrier to movement and isolate Tower Hamlets from facilities within the Park and at Stratford City. Currently the site is isolated by river and road networks. The lack of connectivity and safety concerns with the existing links can be addressed through improvements including bridges. The proposed bridges from the park to other parts of Fish Island and Bow are temporary with no firm commitment to make them permanent beyond the lifetime of the games. Without firm commitment for improved links Tower Hamlets residents could be isolated from the facilities.

View of London Borough of Tower Hamlets

7.34 In order to provide the best possible benefits to Tower Hamlets' residents, guarantees should be sought that:

- The construction of the permanent bridges is mandatory and cannot be withdrawn at a later stage. Planning permission for temporary structures should only be given on the condition that these are replaced with permanent structures after the Games.
- At no point will the established connection between the Olympic Park and the rest of Tower Hamlets be severed. Construction of permanent bridges should be scheduled so that there is always one of the two bridges available at all times.

7.35 Any permanent structure that replaces these temporary bridges will require technical and highways approval by Tower Hamlets.

7.36 The mechanics of securing permanent bridges through the grant of a planning permission needs very careful consideration. A positive planning condition to provide the bridges is

effectively unenforceable. To be effective, planning conditions have to be worded in a negative manner and the Grampian form is ideal here. This would mean that something that is beneficial to the developer should not happen until what we want (the provision of the bridges) happens. It is recommended that the method suggested above in relation to the wider legacy design issues be used here also. Therefore the design for the bridges should be submitted and approved prior to any alterations taking place to any of the retained facilities and the first use of any of those facilities should not take place until the bridges have been provided.

Open Space

Explanation:

- 7.37 The open space provision within the London Borough of Tower Hamlets will be increased as a result of the Olympic/Paralympic Games and their legacy from 2.1 hectares to 4.9 hectares, resulting in an open space increase of 2.8 hectares or 130%. It is noted that in measuring open space waterways have been included.

Issues for London Borough of Tower Hamlets:

- 7.38 The additional open space to be created in the London Borough of Tower Hamlets is likely to fall significantly short of the requirements of the London Borough of Tower Hamlets Open Space Strategy. The Open Space Strategy sets a target of 1.2ha of publicly accessible open space per 1,000 population. The Fish Island area located within the site boundary is designated almost in its entirety as development land in the legacy application. Based on the figures presented by the ODA recently, the amount of Open Space (including water surfaces) in legacy mode is 4.9ha up from 2.1ha at present representing an increase of 2.8ha. Based on the Open Space Strategy target of 1.2ha per 1,000 population this additional open space (if publicly accessible) will cater for 2,333 potential new residents. Given the amount of serviced development land proposed in the area, the actual amount of residents in the area in legacy mode is likely to be significantly higher. Furthermore, some of the proposed Open Space (mainly river embankments) does not appear to be publicly accessible and is therefore unlikely to count towards the standard set in the Open Space Strategy. This also applies to water surfaces, which have been included in the ODA's calculation of open space.

View of London Borough of Tower Hamlets:

- 7.39 The Council expects an overall gain in publicly accessible open space with true amenity value for local residents, particularly given the loss of Metropolitan Open Land (note that this will be a departure from the London Plan policy 3D.9 and will therefore require notification to the Secretary of State). The Olympics area has been identified as deficient on access to open space and any regeneration strategy or planning application should take this factor into consideration.
- 7.40 Guarantees should be sought that areas designated as legacy communities will include sufficient open space to meet the standards set by the London Plan.
- 7.41 The Legacy Master Plan should not only address the connectivity of green space and open space within the Area, but look at links with green and open spaces outside of the boundary, especially with regards to Victoria Park to the west. Further work needs to be undertaken with regard to ownership, management and maintenance of the legacy park. This should be conditioned by the ODA.

Issue 3: Sustainable Environment

Environmental Impact Assessment

Explanation:

- 7.42 An Environmental Impact Assessment has been carried out which identifies the likely key

significant environmental effects of the project to ensure that prior to the commencement of development these likely effects have been assessed and that mitigation measures envisaged to remove, reduce or offset adverse effects are described.

Issues for London Borough of Tower Hamlets

- 7.43 Overall, the objectives of sustainable development are central to the planning application. However it is felt that more ambitious targets should be adopted to give further assurances to the relevant authorities, local communities and other stakeholders that sustainable development is not only an ambition but can be achieved with the scope of this development.
- 7.44 The Non Technical Summary is not consistently written up in terms of environmental effects of the application and does therefore not give an accurate overview. The Sustainable Development Strategy with its 12 Sustainability Objectives is welcomed. It is felt that some targets may enhance the ability to measure and monitor progress against these objective and commitments to these should be included within the Planning Application.

View of London Borough of Tower Hamlets

- 7.45 It is recommended that Regulation 19 is used to ensure a more consistent and therefore accurate picture of environmental effects in this important document.
- 7.46 The Environmental Impact Assessment suggests a number of mitigation measures to reduce significant environmental effects. It is recommended that most if not all of these are included as some form of condition when granting planning permission. It is not sufficient to state that the development should be carried out in accordance with the Environmental Impact Assessment; individual conditions concerning mitigation measures must be listed.
- 7.47 Effective monitoring agreements between the ODA and contractors need to be put in place to ensure that the mitigation measures set in place during construction as well as during operation and beyond are effective and are achieving what they set out to achieve.
- 7.48 In terms of cumulative effects, the major developments as part of the London Thames Gateway have not been assessed. This is a major omission for this chapter of the Environmental Impact Assessment.

Biodiversity/Ecology

Explanation:

- 7.49 The 2012 Games aims to be the most sustainable Olympics in history. This is an aspiration that is fully supported by the Council. In terms of environmental sustainability important considerations include impacts on biodiversity and habitats including the waterways which are designated as a site of importance for nature conservation (CP33).

Issues for London Borough of Tower Hamlets

- 7.50 The council seeks to ensure the protection, conservation and enhancement of biodiversity. The impact on biodiversity during all different phases of the Olympics (construction, games, deconstruction and legacy phases) and the uses made of the land should be clearly defined and adequate mitigation mechanisms put in place before permission is granted.
- 7.51 The creation of new open space and habitat in the form of wetland is welcomed. The appropriate management of invasive species, such as Japanese Knotweed is also welcomed. It is also planned to relocate some species. Relocation is not always appropriate and the ODA needs to be satisfied that this is the best option for the particular species in question.

- 7.52 It is welcomed that important trees are sought to be retained. It is recommended that a suitable distance around the tree is also protected to ensure that the roots are not affected by construction works.
- 7.53 In principle, the proposed works to the river walls are acceptable, however due to some species and habitat sensitivity appropriate mitigation measures need to be conditioned to ensure that minimum disruption is caused.
- 7.54 The decontamination of the waterways is welcomed and should lead to an overall enhancement of the rivers and canals within the site. However, pollution within rivers and canals cannot be looked at on a site specific basis and it is therefore in the ODA's interest that potential offsite pollution sources are identified and an assessment is made on how these can be eliminated or at least mitigated against.
- 7.55 Although there is a commitment to achieve a cut and fill balance, the worst case scenario includes the estimate of 230,000m³ to be imported. This amount should be reduced as much as possible and sought to be transported by water or rail to reduce further transportation related impacts.
- 7.56 It is welcomed that a reduction of 40% of water usage is aspired to.

View of London Borough of Tower Hamlets

- 7.57 The Council expects an overall net gain in biodiversity as a result of the Games.
- 7.58 The impact on biodiversity during all different phases of the Olympics and the uses made of the land should be clearly defined and adequate mitigation mechanisms put in place before permission is granted.
- 7.59 Appropriate mitigation measures need to be conditioned to ensure that minimum disruption is caused to trees which are proposed to be retained.
- 7.60 Potential off site pollution sources to rivers and canals should be identified and an assessment made. If this is not already addressed within the EIA, this should form a Regulation 19 request.
- 7.61 The amount of excavation proposed accords the site should be minimised as much as possible to limit environmental effects. The reduction of 40% water usage should be conditioned by the ODA in order to ensure achievement of this goal.

Issue 4: Making the Best Use of Waterways

Explanation:

- 7.62 The future use of the waterways as an active part of the proposals for the Olympics and the development of a Water City in the Legacy period are paramount in the design of the proposals.
- 7.63 The proposals to transform the waterways are welcome. However insufficient attention has been given to practical options for providing access to the waterways as part of the aspirations to use them for freight, passengers and recreation.
- 7.64 The LLV Regeneration Strategy (LLV RS), the ODA Sustainable Development Strategy (LLV SDS), the Lower Lea Valley Vision (LLVV) and the Lower Lea Valley OAPF (LLV OAPF) envisage use of the waterways for freight – particularly associated with construction and waste and for passenger transport, leisure and recreation.
- 7.65 London Plan Policy 4C.14 is designed to promote sustainable transport and help reduce congestion and the impact of goods vehicles on London's roads.

7.66 Policy 4C.28 in the Draft Further Alterations to the London Plan states: “Wherever possible, new developments adjacent to canals should maximise the use of water for the transport of construction materials and for the removal of waste from site.”

7.67 The London Borough of Tower Hamlets seeks to ensure that the greatest possible use is made of the waterways for the movement of materials to and from the sites and that full advantage is taken of the new Prescott Lock. As the Transport Assessment specifies using alternative and more sustainable transport modes “*will increase the reliability and delivery whilst minimising the impact on surrounding communities*” through a reduction in road transport.

Issues for London Borough of Tower Hamlets

7.68 Issues include:

- A number of sites within the park are currently accessible from the non tidal and tidal waterways. The ease of which these waterways can be accessed could be compromised by the plans to naturalise the banks of the waterways. This could lead to a failure of the waterspaces through inactivity and lack of use.
- The absence of firm commitment to facilitate the use of the waterways to import construction materials. The way that the sites are organised throughout the Park is not functional to facilitate water transport.
- The failure to link removal of demolition and construction waste to suitable waterside locations to facilitate barge transport for onward disposal.
- The absence of proposals to establish waterside infrastructure – piers, wharves or landing stages - that would facilitate water transport..
- The absence of proposals to establish waterway infrastructure to transport people and goods on the waterways within the park both during the games and the Legacy period.
- Wood fuel destined for the proposed Biomass Plant at Kings Yard will require suitable access points on the waterway network for material to be loaded onto barges.
- Methods for transporting waste to the potential waste transfer station in Legacy are not identified.
- The use of ‘back of house’ areas for handling waste in operation during the Games and Legacy could exclude the option of using water transport.

View of London Borough of Tower Hamlets:

- 7.69
- It is important to relate water freight access to places where future employment and industry will be located and to road access to allow for intermodal transfer, particularly for waste and recyclates. A number of piers and wharves should be designed and located throughout the site to provide connections to the construction sites for water freight.
 - A wharf located near the railhead at Bow Midland (St Clement’s Wharf) could be used to facilitate the onward transfer by barge of materials arriving by rail to construction sites within the Park.
 - On site construction facilities such as concrete batching plants and reception areas should be located so as to transport raw materials and construction materials straight to and from the waterways.
 - Piers located at strategic points would provide access to the venues for transporting passengers on the waterways within the Park.
 - Waste generated on site during the Games could be removed via the wharves and piers on barges rather than lorries. Access to waterways should be one of the factors involved in choosing the locations for the waste management areas.
 - Wharves and piers built for the Olympics can continue into the legacy period and be used in connection with future industrial and residential development.
 - Locations for a marina and moorings should be considered so that the waterways

can be enjoyed in the legacy period for leisure and recreation.

- Sources supplying wood fuel for the Biomass Plant should, if possible, be adjacent to the waterway network and access onto the waterways should be identified or created to allow road sourced fuel to transfer to barge.

The above issues and views are elaborated upon in a response provided at **Appendix I**.

Issue 5: Renewable Energy & Sustainable Waste Management

Renewable Energy

Explanation:

- 7.70 Using renewable energy sources is a key component of reducing carbon output and tackling climate change. The proposal includes a biogas operated Combined Cooling Heat and Power (CCHP) system that will provide energy for the Games and much of the wider area, including parts of Tower Hamlets, following the Games.

Issues for London Borough of Tower Hamlets

- 7.71 Minimising construction waste, water, energy use and waste during the Games will also be crucial, however, only a limited amount of information is available regarding these issues. This district energy system is supported by Core Strategy CP38. However, the CCHP provides an opportunity to manage waste from the Games and legacy uses in a more sustainable way if it were to be designed to convert waste to energy. This may require a larger land take for its operation, but this is possible given the adjacency to Fish Island Strategic Industrial Location, which has been identified as a location for waste management facilities (CP39).
- 7.72 Other measures to introduce renewable energy sources include a wind turbine in the north of the site area, which is supported in strategy terms as it will help contribute towards policy CP38 and CP3. However, this is only likely to provide a small proportion (10%) of the energy needs.
- 7.73 It is encouraging to see that the development will make best use of sustainable design by utilising passive solar gain, etc and to make the design as flexible as possible to enable accommodation of future technologies. Development of such a large site provides a good opportunity to utilise such measures to the best potential.

View of London Borough of Tower Hamlets

- 7.74 Generally, it is felt that the renewables and CO₂ emission reduction targets should be raised higher than 20%. This is to reflect future targets of Zero Carbon developments. Given that the timeframe for the application goes beyond 2014 the likelihood for more stringent legislation is very high. Raising the targets would also send a clear message to all stakeholders and interested parties that the ODA is serious about making these Games the most sustainable in history.
- 7.75 A condition should be imposed that wood chips can only be transported by barge or other water transport vessel and that the wood is sourced from sustainable sources and as close to the site as possible to avoid excessive transportation and therefore reduce the positive impacts in terms of CO₂ reduction.
- 7.76 Whilst the ODA appear to be content with the potential reduction of 34% carbon emissions from the predicted baseline the evidence suggests that a target of carbon neutral or pure zero carbon powered games is easily achievable via a mixture of commercially available and proven technologies. Therefore more measures should be integrated into the park design if the aims of delivering a truly sustainable games are to be realised. Suggested measures include:
- Energy Efficiency in Buildings: The targeted aspiration of 15% improvement on

current building regulations needs to be higher. The Building Research Establishment (BRE) should take an Olympic standard on this view.

- Supermag: Supermag technology (using natural magnetic fields) which results in zero emissions should be implemented to assist the Olympics in achieving zero carbon emissions.
- Carbon Mitigation Strategy: Fuel cell providers should be supplying zero carbon energy on site with control via the energy centre.
- Carbon Dioxide Emissions Reduction through Renewable sources: the proposed target of 20% from these sources is poor and should be improved to in excess of 50%.
- Rain water harvesting should be implemented as the vast amounts of roof space proposed mean that this feature would be viable.

7.77 The above issues and views are elaborated upon in a response provided at **Appendix J**.

Waste

Explanation:

7.78 During construction it is sought to re-use and recycle as much of the material as possible (90% by weight). 20% (by volume) of construction materials are proposed to be sourced from re-used or recycled sources.

Issues for London Borough of Tower Hamlets

7.79 The re-use and recycling of materials as well as sourcing needs to be monitored by the ODA. This should be conditioned and monitored by the ODA and higher aspirations set to try and over-achieve this target. Much of this work would be for the Steering Group to review.

View of London Borough of Tower Hamlets

7.80 Waste has not been addressed beyond construction. It should be conditioned that a Waste Management Plan is produced for the Phase during the Olympic and Paralympic Games, with the aim of reducing the amount of waste produced during the Games and of re-using and finally recycling as much as possible.

Issue 6: Traffic & Transport Considerations

Olympic & Legacy Travel Plan Group

Explanation:

7.81 The supporting documents identify the need for committed and co-ordination and management of the Travel Plan to deliver site-wide and programme delivery-wide success. It is proposed that an Olympic Park Travel Plan Group is set up to deliver this across all phases of the delivery programmes from construction to occupation of the Legacy land uses.

Issues for London Borough of Tower Hamlets

7.82 The establishment of a Travel Plan Group is welcomed and will help to deliver a consistent, well managed, monitored and enforceable Travel Plan. Due the specific nature of the development and the impacts of the Travel Plan on the Highway network, bus routing, pedestrian and cycling facilities; along with the co-ordination of this travel plan along with future development proposals; it will be necessary for this responsibility to be properly resourced by the developer so that the respective council's can ensure proper monitoring and delivery.

View of London Borough of Tower Hamlets

7.83 To facilitate the intense investment in time and detail this role will be required to deliver; the ODA should be conditioned to provide a contribution towards revenue support for officer

time, from 2007 to at least 2014, with a review period in 2014 to identify contributions going forward to 2021, when management companies for venues and new residential and commercial land-uses will be required to manage and monitor their individual travel plans.

Highway Mitigation Measures

Explanation:

- 7.84 In the TA (Volume 13a section 1.3.18 and section 10.4) reference is made to setting up a framework for identifying and taking forward mitigation measures for transport schemes that have been identified as necessary as a result of all Olympic Legacy and development associated with it, as well as contributions from developments within the wider Lower Lea Valley area. This would be known as OPTEMS – Olympic Park Transport and Environmental Management Schemes.
- 7.85 OPTEMS would be set up jointly with Boroughs, TfL and UDC. This would give Boroughs and TfL comfort that structures are in place for identifying, costing and taking forward schemes which are in line with policy – in advance of the detailed information being available.
- 7.86 These would include, initially, an Agreement between the ODA, TfL, LDA, UDC and the Boroughs and provide for the constitution of a Lower Lea Valley Transport Investment Group with delegates from the each of the above bodies.

Issues for London Borough of Tower Hamlets

- 7.87 The setting up of OPTEMS and The Lower Lea Valley Transport Investment Group is welcomed and will provide a unique and effective way to control and implement highways mitigation measures. However there is a concern over staffing availability for this function.
- 7.88 The officer responsible for attending will come from Transportation and Highways – Development section, as they are best placed to liaise with Development Control over applications, as well as secure contributions from developers, along with liaising with Highways Design, Highways Asset Management and Capital Programmes and the Local Implementation funding team.

View of London Borough of Tower Hamlets

- 7.89 For this role to be fulfilled revenue funding must be supplied primarily by the ODA, supported by other developments in the Lower Lea Valley as they progress through planning. A Contribution to fund this role should be made available by the ODA from 2007 through to 2014 for this role as a condition of planning; with a commitment to continue funding to 2021 following a review.
- 7.90 OPTEMS needs to function with TfL's LIP programme, particularly where bids for next years work are already being drawn up. TfL's involvement in OPTEMS is vital. Also understanding that transport programmes, particularly signalling have long delivery times. It is essential that these factors are taken into account in the delivery of programmes.
- 7.91 OPTEMS and the Lower Lea Valley Transport Investment Group needs to be set up as soon as possible, preferably prior to construction work begins. This should be a condition of the planning permission.

Revenue Support

Explanation:

- 7.92 In light of the responsibilities we will have to the delivery of the Olympic Park, Games operation and Legacy, from both OPTEMS, Travel Plan Management, Network Assurance and Project Management, Tower Hamlets will need to ensure that they have the adequate resources necessary to deliver these key responsibilities in time.

Issues for London Borough of Tower Hamlets:

- 7.93 Tower Hamlets is the borough that will deliver most of the traffic from Central London to the Games site. This includes the spectators, workforce (construction and Games), and the Olympic Route Network. This will require intensive levels of staffing.

View of London Borough of Tower Hamlets:

- 7.94 The ODA will need to supply revenue support to Tower Hamlets, Transportation and Highways section. This has been assessed as 3 FTE at PO2/4 staff members. These should be in place as soon as possible, preferably by July 2007, to enact the programme of works necessary.

LBTH Highways - The Existing Situation

Explanation:

- 7.95 A full assessment of highways and transportation issues is provided at **Appendix K**. The following is a summary of issues raised/ view of the London Borough of Tower Hamlets Highways Officers.

Issues for/ View of London Borough of Tower Hamlets

7.96 *Existing Highway Network*

- Surveys relating to journey times on priority roads within both the local and TfL road networks indicate that sections of the road network are congested. These figures highlight concerns over construction effects on the road network and disruption that may be caused by the transfer of passengers by bus and the distribution of the Olympic Family during the Games operations.
- Roads that are planned to be closed during construction and the Games are also of concern, as most of this traffic will be displaced onto the existing road network when the closures come in to place. Thus exacerbating the congestion on these roads. This will impact on construction and Games traffic.

7.97 *Existing Junctions*

- The Roman Road/Cambridge Heath Road/Bethnal Green Road, A13 and A12 junctions are not identified as routes for construction; the A12/A13 junction may form part of the Olympic Route Network. However all junctions may suffer further problems due to increased traffic on the main distributor roads, which may encourage more local traffic to use these routes.
- Plans for the cycle parking to be located in Victoria Park during the Games will necessitate that the Bethnal Green, Roman Road junction will need measures to accommodate an increase in cycle traffic.
- The TA identifies that the junction with the A12 and A11 are over capacity. This is consistent with other evidence and shows that the Bow Flyover is operating efficiently; however increases in construction and Games traffic will have a major impact on these junctions and will need to be closely examined.
- The Roman Road/Cambridge Heath junction is of major concern; as this junction controls traffic flows on the wider network. Increased traffic would have significant effects not just locally but network wide. This junction needs to be seriously considered and approaches to it, from Olympic related traffic needs to be managed.
- Accident Statistics - There are concerns over accidents in the Mile End and Old Ford area where there were significant clusters of accidents around the Underground Stations. More local traffic on these routes could increase accidents here and measures around these interchanges may need to be implemented.

7.98 *Existing Rail network*

- A number of stations in the vicinity of the site will be directly affected by the application. The following stations should also be considered in the existing picture of rail services. Bromley by Bow, Bow Church and Bow Road, and Mile End Station

stations are within easy walking distance of the application boundary.

7.99 *Existing Coach Services*

- There are 37 return coach journeys per hour that stop at Stratford that pass through Tower Hamlets, and an additional 96 journeys per 2 hours that service Stanstead Airport terminating or originating from the City that stop at Stratford. Although it should be noted that none of these services stop in Tower Hamlets.

7.100 *Existing Walk And Cycle*

In general the routes are poor quality due to heavily traffic roads, limited crossings and the number of waterways and railways that cross the routes. In addition there are perceived, as well as actual, personal security risks which discourage walking trips in the area.

Site Enabling & Construction

Issues for/ View of London Borough of Tower Hamlets

7.101 *Site Enabling*

- The closure of White Post Lane leading into Carpenters Road across the Tower Hamlets Boundary during will have the most direct effect on transport in this borough.

7.102 *Highways impacts*

- The main impact of the road closures will be on The Eastway. However it is felt that whilst the modelling is robust there will be more impacts experienced on the East Cross Route and Bow Interchange due to increases in construction traffic to the North of the site and east of routing the East Cross Route and High Street Stratford offers.
- Whilst it is considered that the road traffic impact on Bow Interchange will not exacerbate the junction operation from a vehicular point of view, there is concern that the impacts on the bus interchange and the pedestrian crossing at this junction may be negative. Consideration must be given to bus, pedestrian and cycling activities at this point. This should take the form of signal priorities, more legible and desirable crossing facilities and signal timing changes.
- The Wick Lane/Tredegar Road/East Cross Route Interchange may also suffer from congestion as traffic attempting to enter or exit the East Cross Route from either direction may encounter more delays. Continuous monitoring of queuing on the slip roads should be considered throughout the construction period. Should any increases in delays and queuing be experience here, mitigation measures must be considered and implemented.
- Monitoring of Tredegar Road should be considered as a potential route to avoid Bow Interchange. If queuing of traffic at the Bow Interchange occurs, traffic may use Tredegar Road/Fairfield Road area as an alternative route to avoid the Bow Interchange. Should this occur, mitigation measures along Tredegar Road should be implemented to slow traffic and discourage this potential 'rat run.'

7.103 *Construction Traffic*

- It has been impossible for full assessment of the impacts of construction traffic, (mainly deliveries and removals from site) due to the omission of vital detail as to where the construction vehicle entry and exit points will be, with exception of comments stating: "...with HGVs mainly routed along the M11 and A12. Most vehicles will access the construction site from the Lea Interchange. Whilst there will be additional access points to the south and southwest of the Olympic Park, these are secondary in importance."
- There is no location detailed, and comments such as construction traffic will arrive and leave via the North are insufficient to assess the impact fully. It is important, from an impact on residents and business point of view, to establish the proposed

routes. The access points to the south could impact in the A12 Blackwall Tunnel Northern Approach, A13 East India Dock Road and the Blackwall Tunnel itself. Even as secondary routes, these access points could generate a negative impact on traffic in the area, as well as create problems for local residents.

- Routing is the single most important factor in considering the impacts of construction traffic and the omission of detail from the Transport Assessment is extremely disappointing.
- It is noted that the number of vehicles anticipated daily will be 275 vehicles per day per direction, totalling 550 trips. This is a significant number and the true effects will need to be fully examined once construction routes are finalised.
- A condition is required to ensure that this information is provided in advance of work starting and in consultation with the Highway Authority. This is of public concern and will need to be viewed and agreed in public.

7.104 *Workforce Travel*

- Detailed monitoring and enforcement should be undertaken through the Olympic Park Travel Plan Group to ensure that a maximum of 10% of construction workers arrive by car.
- Details of workforce access points will need to be submitted along with parking locations as any non vehicular access points to the East, North East and South East corners of the site could encourage parking outside of the site. A particular concern is Fish Island, where no controlled parking zones exist at present. Residents and businesses will need to be protected from construction parking and a CPZ should be a mitigation measure that is enacted as a priority.
- A shuttle bus is mentioned in the application that will operate from off-site railway stations to accredited entry points. The entry points need to be identified, as do the rail stations.

7.105 *Highways Measures*

- It is considered that the potential measures to mitigate the level of impact created by road closures and construction workforce are acceptable solutions, however they lack detail. This is of greater concern as construction will commence in the later part of this year and measures will need to be consulted and implemented very quickly. It is possible that OPTEMS will deliver these in detail, however the OPTEMS system has yet to be set up and the Lower Lea Valley Transport Investment Group is not operational and only an idea in this application. It is a matter of priority that these groups be established and start work on the mitigation measures in time for the start of construction. It is in the interests of the ODA to have established a significant level of detail concerning mitigation measures surrounding construction to assure and comfort local residents.
- It is of vital importance that monitoring, enforcement and effect control is established to protect local residents and businesses from adverse impacts. Aspirations to inform residents, focus groups and information telephone hotlines and reporting lines are important but measures need to be detailed on what will happen to complaints and what penalties will be applied to construction offenders. Similarly the measures need to be identified to prevent continued re-offending.
- The Bow/Tredegar Road area has significant traffic calming measures in place currently. These appear not to have been taken into consideration. The current measures need an area wide review and new and replacement measures need to be implemented to ensure that the area is more efficiently managed and prepared for Olympic traffic impacts.
- Permanent signalling of the A12/Wick Lane junction should be seen as a priority and will act as a control opportunity. This is welcomed.
- The Olympic Travel Plan Group should monitor the effects of construction traffic and its impact on the highway network and inform OPTEMS of the need of mitigation measures which should then be carried out.

7.106 *Public Transport*

- Bus routes affected by closures include the 276 service where a diversionary route will be in place throughout the construction and games phases. This route whilst acceptable would be preferable if it was to include areas of Tower Hamlets currently lacking in adequate provision, it is not accurate to say that the diversion route has been agreed by Tower Hamlets. There is also concern over London Bus's potential plan covering changes to the S2 and new 425 routes, which appear to contradict plans agreed by Tower Hamlets and the ODA.
- There is potential for further bus priority in the area and discussions regarding bus priority are on-going. These discussions need to be increased and action taken as a priority to deliver significant mitigation measures.
- The relocation of East London Bus and Coach Company's 'Stratford' and 'Waterden Road' bus garages and First Capital East's 'Hackney' garage to a site in Wyke Road on Fish Island are currently pending application. Should this proposal be enacted bus routing needs significant discussion to ensure that Tower Hamlets realises significant bus route improvements for local residents and businesses.

7.107 *Walking & Cycling Measures Envisaged*

- These improvements to the Greenway and Lea River Navigation are welcomed but the following measures need to be included to ensure that the best facilities are provided:
 - The improvements to width and sightlines should be of a high standard and accommodate maximum demand for cycle and pedestrian flows anticipated.
 - The improvements to surface treatments should be made to the London Cycle Design Standards.
 - Approaches and treatments to the Greenway should accommodate mobility impaired users.
 - Measures will need to be designed and implemented to prevent the use of these routes by motorcycles.
- It is possible that sections of both the Greenway and Lea Navigation towpath will be closed for periods during construction; requiring mitigation measures and signage. An alternative route would be along Stratford High Street and the River Lea Navigation towpath.
- Concern is raised for inexperienced cyclists using the busy A11 as an alternative route, a dedicated cycle lane should be provided, the use of the River Lea Navigation towpath would be ideal; but it must be to a standard to accommodate shared pedestrian and cyclist traffic.
- Improvements to the A11 will be welcomed but particular focus must be made on the Bow Interchange which will be a critical crossing point coming off the River Lea and significant measures must be implemented to ensure safe, direct and fast crossing at this point.
- Concern is raised for inexperienced cyclists using the busy A11 as an alternative route, a dedicated cycle lane should be provided, the use of the River Lea Navigation towpath would be ideal; however it must be to a standard to accommodate shared pedestrian and cyclist traffic.
- Improvements to the A11 will be welcomed but particular focus must be made on the Bow Interchange which will be a critical crossing point coming off the River Lea and significant measures must be implemented to ensure safe, direct and fast crossing at this point.

London 2012 Olympic and Paralympic Games

Issues for/ View of the London Borough of Tower Hamlets

7.108 *The Olympic Route Network*

- It is the ambition of the ODA to host a 'public transport Games'. Car parking will not be provided for ticketed spectators, with the exception of disabled people. Strict parking controls will be implemented around the Park during the Games to support the strategy to minimise car use. Visitors will be expected to access the Olympic Park through:
 - Public Transport
 - Cycling
 - Walking
 - Park and ride services
 - Coaches
- It is essential that along with TfL, Tower Hamlets is consulted and included in the development of any traffic management measures implemented. With the effects of temporary traffic measures along East India Dock Road and The Highway impacting on local traffic, combined with increases in bus traffic and activities, such as the marathon, along Mile End Road/Whitechapel Road; could impact heavily on local residents and businesses. All measures need to be co-ordinated with Tower Hamlets as the Highway Authority.
- In addition, any temporary measures to control traffic will need to be assessed and considered as to their effectiveness. It should also be considered as to whether the temporary measures would be better put in place earlier than 2012 and be permanent; creating a lasting legacy to local communities.
- The Olympic Family will access the site through an accreditation area adjacent to the A12, accessed from Wick Lane, at the junction with the East Cross Route. As this is the main entry and exit point on the ORN a significant amount of traffic will be utilising this junction and will have priority over other traffic.
- Diversionary tactics and notices will need to be in place to reduce traffic flows from the Bow and Old Ford area to this Junction.

7.109 *The International and Broadcast Centre and Main Press Centre*

- As the Media will have access to the ORN, they will be impacting on to roads that traverse Tower Hamlets. In particular the Bow Interchange. It is essential that effective management of this route and the junction is considered in conjunction with local needs and the needs of the bus network that will continue to serve local residents during Games events.
- It is a concern that with the increases in the bus patronage by event visitors, particularly the Number 25 and those routes that interchange under the Bow Flyover, delays as a result of the ORN and associated transport, local residents will be unable to access the bus network at the intermediate stops. This coupled with crowding on the underground network, especially the Central Line and DLR routes; and local traffic measures preventing car access; could mean that residents in Bow and between Mile End Road and East India Dock Road could find themselves isolated from essential services and amenities.

7.110 *Junctions*

- A12 Bow Interchange – optimised signal timings required to ensure that this junction operates satisfactorily as apart of the ORN. Whilst the ORN traffic is given priority, necessary consideration of the bus interchange under the Bow flyover must be taken into account to preserve local accessibility to the bus network.
- B142 Tredgar Road/A12 East Cross Route – This junction will provide access to the Olympic Family accreditation area. Signal controls will have to be implemented for the duration of the games.
- It should be investigated as to whether permanent signals should be installed to facilitate safer pedestrian and cycle crossing and to regulate flow in legacy. This junction could also suffer from increased flows following legacy transformation and residential and commercial occupation of legacy land uses.

7.111 *Highway Measures Envisaged*

- The application states that measures will be developed following responses on the first draft of the Olympic Transport Plan. Whilst this is understandable, more details could have been presented at this stage based on traffic modelling and known facts. These measures will need to be planned into the existing highway maintenance programmes so as to avoid and minimise further disruption; in addition work that should mitigate the construction phase may also be helpful for Games period. Completing the work at the same time would again minimise disruption. Therefore, it is essential to have full details as early as possible. OPTEMS should see this as a priority.
- The Olympic Transport plan sets out the overall games management proposals including the ORN, Olympic Lanes and management of all Games movements, this document was deficient in many areas covering the management of transport and was mainly aspirational with few details to examine. It is felt that this application does little to fill in the gaps that exist in the OTP.
- It is recommended that taxi traffic scheduled for the rank should have a specific route to the drop off zone that avoids the A11 Mile End to Stratford route to prevent the event visitors hailing taxis along this important transport corridor, which could block bus lanes, and cause a public safety issue.
- *Public cars will be dissuaded from pick up and drop off around the site*, this will need to be enforced and managed. The area of enforcement and control will need to extend for a considerable distance around the park, taking into account large areas around Bow.
- *Traffic calming in neighbouring areas will be considered to manage undesirable diversion of traffic into commercial or residential communities. This will be required in a number of areas including Bow, Victoria Park.* This will be essential and necessary in Bow and the area between the A11 and the A13. The ORN in combination with the high traffic demands along the A11 will put pressure on this area and could result in accidents and negative impacts on the community.
- *The management, monitoring and control of off-site junctions.* These are unspecified but a detailed plan needs to be included and needs to take into account other Games time operations, such as cultural events at Victoria Park, events at the Excel centre and at Greenwich.
- *Enforcements and extensions to current CPZs in areas such as Bow,,* this needs to be extended to include Fish Island, areas around Bethnal Green (the predicted main cycle route), areas north of Poplar and around Bromley by Bow.

7.112 *Coach Transport*

- Parking for direct service coaches – those who are chartered specifically for the Games or part of package tours, and park and ride coaches will have dedicated coach parking within the transport malls and off the public highway. This is welcomed.
- Scheduled coach services will also operate, these will have defined drop off and pick up points outside the park entrances, which have yet to be defined. It is of concern that these stops will interrupt the flow of the highways and cause narrowing of pavements where passengers wait to alight.
- The timing of pick ups and drop offs will have to be closely managed. It is highly likely that the times for pickups and drop offs will be similar and could cause queuing on the public highway. This must be managed effectively and no public highway disruption must be allowed, as this could interrupt the effectiveness of public transport operations. Similarly coaches should not be permitted to use bus lanes that will serve the Park; this will slow down the efficiency of the bus operation.
- In addition there is concern that once these coaches have completed their drop off they will have to wait somewhere until they can collect their passengers at the end of the day. These locations will have to be defined and will have to be managed effectively to prevent overcrowding and disruption to the highway on entry and exit.

7.113 *Water Transport*

- The use of river services should not be underestimated. The establishment of a river based infrastructure for the Olympics will provide a valuable legacy post games. The more people using the rivers as a transport route for the Olympics the more use these networks will gain in legacy, this will bring about rejuvenation effects along all river and canal routes, this will increase to a greater use of towpaths and river walkways. This in turn will provide greater natural surveillance and increase activity.
- The use of rivers and canals should not be seen as an aspiration, but as essential for delivering legacy benefits not just to the Park but to all the routes the canal and river networks traverse.

7.114 *Public Transport*

- There is concern that longer distance bus routes to Stratford have sufficient capacity to accommodate all demand. In particular, the number 25 should not reach overcrowding with spectators before reaching Tower Hamlets. This will prevent the local population from accessing this service for daily needs. It has been suggested that there are direct/express services with minimal stops, supplemented by services on the same route that serve all stops or inter-stop services during Games time.
- With West Ham as a destination station for the Olympic there is concern that the Jubilee Line will not be able to serve both the Olympics and Canary Wharf. There appears to be no mention of working with the Canary Wharf business to promote flexible working over the Olympic and Paralympic Games period.
- Far more detail is needed on crowd dispersal measures that are planned for Stratford stations and West Ham, and ensuring that they do not compromise local and commuter traffic not linked to the Games.
- There is concern about the increases on the Central Line at Mile End, the North London Line at Hackney Wick and the Jubilee Line. Will passenger increases on these lines prevent access on to the services at non-Olympic destination stations, causing station overcrowding and passengers, not related to the Olympics, being unable to access services. Further research and details of crowd management and service accessibility is needed at these stations and on these routes.
- Similar studies need to be carried out on the DLR and associated stations; particularly at Poplar, which is an interchange station. With Pudding Mill Lane station closed for the Olympics there may be an increase in traffic at Bow Church DLR, this needs to be assessed and management measures agreed and implemented.
- DLR potential service patterns greatly enhance the capacity of the Woolwich Arsenal branch, but reduce capacity on the Stratford branch; this leads to overcrowding North of Poplar. Research and mitigation measures need to be implemented
- The Bus network lacks detail and is awaiting further details promised in 2008/09. There is no mention of bus crowding. The 25, 108, 276, D8 and S2 all pass within 200m of the southern entrance and spectators may choose to alight here rather than continue to Stratford. Measures need to be in place to deal with this eventuality.
- The 26, 339 and 388 currently terminate on the western side of the park; these should be extended to Homerton Road to serve the northern entrance.
- In view of train overcrowding the introduction of the D5 service between Canary Wharf and Liverpool Street would help to relieve the demand experienced and could provide wider legacy benefits.

7.115 *Walking and Cycling*

- There is little mention of the most important access route from Victoria Park along the Greenway to the western access. This route will require significant upgrading

and measures to facilitate the volume of pedestrian traffic anticipated. These improvements need to be permanent and remain as a Legacy.

- More detail needs to be supplied on the operational and management arrangements for the secure parking facilities. It is unclear as to the effect of cycle parking locations, Victoria Park may be considered too far for some users and additional facilities may be needed to meet needs.
- Is there provision for informing cyclist when facilities are full and where additional facilities may be located, will there be overspill arrangements? This needs to be considered and planned for by the ODA in plenty of time and in locations that are equally as accessible.
- A route audit needs to be commissioned similar to Cycle Route Implementation and Stakeholder Plan (CRISP) methodology.
- There are seven stations within walking distance of the site, whilst passengers will be directed to use the 3 main hub stations of Stratford International, regional and West Ham, many passengers who are London based may choose to alight at other stations, based on local knowledge, to access the Park. Walking audits need to be implemented to ensure these routes are accessible and safe, plus appropriate measures put in place.

Olympic and Legacy Facilities Transformation

Explanation:

- 7.116 *The Legacy Transformation of the Park is based on the fact that 18 - 24 months after the Games the temporary facilities in the Park will be dismantled and removed and the remaining venues will have been transformed to Legacy use. In the intervening periods the Park will be re-opened in phases, with limited access. It is anticipated that the venues will be operational in 2013/14. What is vital for members to appreciate is that the application proposes a network of roads and bridges that will form the framework of connectivity for legacy – that this framework must be right is axiomatic – how the design was arrived at however is far from clear in the application. This shortcoming in the application has already been identified and addressed under “Issue 2: Urban Design & Connectivity” above.*

Issues for/ View of London Borough of Tower Hamlets

7.117 *Highways*

- The reduction in HGV traffic is welcomed, the increases in service and smaller vehicles will be of some concern, as it will generally be more difficult to route manage their entrance and exit routing from the park. Managing traffic at inter and off peak times should be a fundamental guiding principal of the delivery of the Legacy Transformation. The use of public transport by construction workforce should not just be an “important” mode, it should be the primary mode and target figures should be established to enable the Travel Plan Group to have figures that can be monitored.

7.118 *Legacy Venue Demands*

- The assessment of venue travel demands have been considered in conjunction with the reduction in capacity of the venues left in Legacy. It is of major concern that an assumption has been so car-centric. Whilst there is an understanding that there may be car demand for the venues in legacy, the applicants should have begun with a premise of zero car activity to access the venues and worked from that starting point back to design of the legacy venues. There is much discussion of the improvements to the public transport networks as a result of the Games, this should be capitalised upon for legacy venue operations. Travel plan strategies would be far more effective should car travel be considered as zero.

7.119 *Legacy Venue Car Parking*

- *Car parking requirements have been calculated for each venue in legacy based on daily requirements and event demand and listed below.* Whilst a zero car

assumption would be ideal for the venues, it is acceptable that some parking will be required, particularly for event contributors and workforce needing transport outside of public transport hours. It is welcomed that the venues are looking to rationalise as much parking in the IBC/MPC car park, a statement of operation of this car park needs to be agreed, to ensure that there is sufficient space allocated for venue parking, and that parking isn't allocated to the businesses that take over the IBC/MPC building in Legacy.

- With the exception of the Hockey venue, all event figures are within 10% of capacity. A full understanding of the need for the Hockey venue to have nearly 40% parking during the event needs to be submitted and agreed. A standard of less than 10% should be applicable across the whole site.

7.120 *Legacy Venue Coach Parking*

- The use of coach services is preferable to car parking and efforts should be made to transform more of the car parking spaces in the IMC/ MPC to accommodate coaches. The Travel Plan must include detailed management and control of coach traffic, including scheduled pick up and drop off times and locations, to ensure queuing does not occur on the public highway.

7.121 *End of Games*

- The opening of the highway network in 18 months is welcomed and should alleviate any congestion issues that have been in place since the site was closed for construct.
- Extreme concern surrounds the bridges on the western side of the park; it appears that there is no guarantee that these bridges will be constructed as permanent bridges in legacy. The construction and Games bridges are only identified as temporary bridges and it appears from the comments in the application that these bridges will become permanent dependent on development in Zones 3, 4 and 5.
- These bridges are essential to the regeneration of Fish Island and the accessibility of the Western areas of Tower Hamlets to the Park and Stratford from Tregedar Road. These bridges must be constructed as permanent bridges in the Legacy Transformation. It would be preferable that they be constructed as permanent structures during construction. How this can be achieved is addressed under "Footbridges Linking the London Borough of Tower Hamlets to the Olympic Park/connectivity" in "Issue 2: Urban Design & Connectivity" above.

7.122 *Road Hierarchy*

- A number of design considerations have been taken into account for Legacy roads. These design statements are welcomed and will do much to provide a more accessible and permeable route through the site.
- More emphasis should be placed on connecting existing communities, such as Fish Island and Bow with the site and through to Stratford. This would bring about significant benefits to the regeneration of these areas; thereby providing greater residential and commercial opportunities.

7.123 *Highway Measures Envisaged*

- Comments about management and monitoring of junctions and putting the responsibility on the Local Authority appears to be a wilful discharge of the ODA's responsibility to mitigate the impacts of their development on the wider area. It introduces a Park-centric view of their responsibilities in Legacy and does not further the regeneration of the wider area.
- These junctions will require designing in conjunction with the wider network, which will be severely affected by the Legacy proposals. It is, therefore, essential that these junctions be taken under the proposed OPTEMS system of delivering highway improvements and mitigation.
- The section of Wick Lane from the junction by the bridge to Monier junction is a serious concern in view of the relocation of the bus depot, the new links from

Monier Road across the river and the Greenway emphasis. To provide safe access to the western access, as well as deal with all these changes, this site needs new a major highway scheme to improve safety and traffic flows before the Games - not afterwards as currently suggested.

7.124 *Parking and Loading Measures*

- During Transformation phase, particularly during events, the continuation of the Games CPZs should be made in order to discourage event traffic. This is particularly pertinent to Bow and Bromley areas. These measures will need to have funding secured against the event venues and should be included in all travel plan requirements in perpetuity of the venue operations.
- Any traffic calming measures introduced for the Games will need to be reviewed, it is likely that these will remain and refined to maximise environmental benefits.
- These measures are all welcomed and the OPTEMS route seems the best avenue to deliver these operations with contributions from the Park.

7.125 *Legacy Parking Standards*

- The legacy parking standards are considered to be extremely poor in terms of the potential to reduce car travel. The residential figures are far in excess of Tower Hamlets standards that currently exist in the LDF. These are proposals for 7 years in the future when it is anticipated that both Tower Hamlets and the GLA's plans will be far more stringent in reducing car dependency.
- As a minimum all residential parking standards should be set at a maximum of 0.5 spaces per unit in areas with a future PTAL rating below 3. Where future PTAL ratings are 5 or 6 the developments should be car free. Elsewhere a standard of no more than 0.25 should be applied.
- The proposed standards do nothing to promote a sustainable legacy; they will mean that the aspiration to have the most sustainable Games, if achieved, will be diluted due to a less sustainable legacy.
- The non-inclusion of motorcycle and cycle parking standards is unacceptable. The Legacy site should be aiming to be a world leader in providing cycle facilities, parking and a severe reduction in car dependency.

7.126 *Public Transport/Walking and Cycling*

- There needs to be clearly identified monitoring standards and guidelines for monitoring need and provision; this will enable effective improvements to be commissioned. Ownership of the monitoring process has not been identified. It is suggested that the monitoring is handled by the Olympic Park Travel Plan Group, who should commission regular surveys by independent specialists such as Sustrans or the London Cycling Campaign.

Olympic and Legacy Facilities Operational (2021)

Issues for/ View of London Borough of Tower Hamlets

7.127 *Highways*

- Monier Road Connection - This bridge access and junction improvement at Wick Lane is welcomed and should be part of the deliverables under the OPTEMS system.
- Stour Road Connection - The establishment of Stour Road Bridge as a pedestrian and cycle link is welcomed and the pedestrian/cycle prioritisation measures will be a benefit to sustainable communities both within the Park and to the West in Fish Island and Bow.

7.128 *Assessment of Cumulative Highway Effects*

- The cumulative effect of additional housing and employment in 2021 has significant effect on traffic flows; in particular there is anticipated increases on the East Cross

Route by 3%. This will be significant on an already high demand route. These increases will come from both new residential and employment in the Park site. These can be reduced by a more responsible and stringent approach to parking standards and travel plans in the Park. It should be the responsibility of the Olympic Park Travel Plan group to implement measures to reduce car dependency.

7.129 *Junction Impacts*

- A12 Bow Interchange – Marginal effects are anticipated, management and signal optimisation, particularly during events should be implemented.
- B142 Tredegar Road/ A12 East Cross Route – General traffic management and monitoring of junction operations will need to be implemented to ensure that the junction operates at an acceptable level. Funding through the OPTEMS system should be secured for the long term monitoring in Legacy.

7.130 *Cumulative Highway Measures Envisaged*

- *The A12, A11 and Bow Interchange will experience greater flows; this will be in part due to the overall regeneration effects of the Lower Lea Valley.* The Lower Lea Valley Transport Investment Group should work with the Olympic Park Travel Plan Group, the ODA, LDA and developers as sites progress through planning to ensure that parking is kept to a minimum in commercial and residential developments. This will ease pressure on the road network. It should be highlighted that the lead and best practice examples must be set by the Park. These are not evident in this application.
- On going management of off site junctions will need constant management and maintenance. Funding should be reserved through OPTEMS to maintain this during Legacy.

7.131 *Parking and Loading*

- These remain the same as the Legacy Transformation comments stated earlier.

7.132 *Public Transport Assessment*

- The overcrowding of Mile End station as visitors interchange with the bus network to access the main stadium is of great concern. Provision for crowd management at this station and physical measures need to put in permanently to accommodate this regular occurrence.
- In addition there is a need to understand the real effects of this, or would passengers really continue on to Stratford?
- Bus priority should include a westbound bus lane from the exit of the Bow Roundabout towards Campbell Road and the A12, with bus lanes between Bow Interchange and Wick Lane.

7.133 *Walk and Cycling Measures Envisaged*

- There needs to be clearly identified monitoring standards and guidelines for monitoring need and provision; this will enable effective improvements to be commissioned. Ownership of the monitoring process has not been identified. It is suggested that the monitoring is handled by the Olympic Park Travel Plan Group, who should commission regular surveys by independent specialists such as Sustrans or the London Cycling Campaign
- Bridge improvements must be guaranteed and should be funded by the ODA through the OPTEMS system to ensure they are built in a timely and appropriate method, and so that they are not waiting for speculative development to fund them. This should be seen as an essential regeneration tool to attract development, not as a mitigation measure from future development.
- More details are needed as to how the bridge will link in with existing cycle networks and who will be responsible for maintenance and development in Legacy.
- A clear plan needs to be undertaken to ascertain the level of enhancement

necessary for Legacy walking and cycling.

- Links out of the park, the greenway beyond the Park to Victoria Park, the access routes across the A12 all need to be considered in legacy. It appears at present that the improvements and development is Park-centric. There is a need to ensure links are accessible, attractive and safe which service the Park beyond its boundaries. Otherwise the new links will rapidly become redundant, unused and unsafe.

Travel Plan Framework

Issues for/ View of London Borough of Tower Hamlets

- 7.134 This is an acceptable framework to begin to design a Travel Plan for all phases of the site from Construction to Legacy 2021. However it needs to be refined and developed to become a world class travel plan. At present it does not shine above existing travel plans currently in operation in many London developments. More innovation and exciting new strategies need to be included. This should be the remit of the Olympic Park Travel Plan Group to develop for each of the phases of development. There is substantial scope for improvement. This should be the remit of the Olympic Park Travel Plan Group to develop for each of the phases of development. There is substantial scope for improvement.

Issue 7: Other

Retail, Leisure & Sport

Explanation:

- 7.135 A number of permanent and temporary world class sporting facilities would be constructed on the site for the Olympic and Paralympic Games; several of which are to be retained in the Olympics Legacy. A temporary basketball stadium would be constructed upon Planning Delivery Zone 14, on Fish Island to the east of the London Borough of Tower Hamlets. This stadium would be demolished during legacy and the site developed in accordance with the legacy masterplan and the boroughs future vision for the site as reflected in the Leaside Area Action Plan. It is noted that there are no retail legacy proposals situated within the London Borough of Tower Hamlets.

Issues for London Borough of Tower Hamlets

- 7.136 Issue is raised in relation to the conversion of sporting facilities during legacy in order to provide attractive, accessible and secure facilities which be enjoyed by both London Borough of Tower Hamlets residents. The ODA have recommended that a level of capital contribution from the relevant authority will be required to secure these facilities for future community use. It is however unclear as to how this funding will be secured, it is recommended that further discussion take place to ensure that facilities remaining in legacy aim to meet the needs and are available to surrounding communities in the long term.

View of London Borough of Tower Hamlets

- 7.137 It is recommended that funding to ensure the ongoing community use of the legacy facilities is secured either via Section 106 or other capital sources.

Code of Construction Practice

Explanation:

- 7.138 The construction phase and traffic during the Games are likely to have the most significant impact on amenity.

Issues for London Borough of Tower Hamlets

- 7.139 LDF policy DEV1 requires development to protect and where possible to improve the amenity of surrounding existing and future residents and building occupants as well as the

amenity of the surrounding public realm. Specifically development should not create unacceptable levels of noise, vibration, odour, fume or dust pollution nor adversely affect the surrounding micro climate.

View of London Borough of Tower Hamlets

- 7.140 The London Borough of Tower Hamlets would expect full compliance with the council's construction code of practice. A detailed assessment of the Code of Construction Practice is provided at **Appendix K**.

8.0 CONCLUSIONS

- 8.1 All other relevant policies and considerations have been taken into account. The ODA Planning Decisions Team should consider the views and issues of the London Borough of Tower Hamlets set out in the (Draft) Observations Letter to the ODA attached as **Appendix L**.

Appendix A

Site Description

1. Site Preparation Planning Application

2. Olympic, Paralympic and Legacy Transformation Planning Application

- to the north by the Eastway (part), A12 East Cross Route (part), the River Lea, the northern and eastern boundary of East Marsh, New Spitalfields Market, Ruckholt Road and Temple Mill Lane;

- to the east by the Temple Mills Lane, the Lea Valley Line Overground Railway Line, land to the east of Leyton Road, Angel Lane, part of the Great Eastern Line until Stratford Regional Station, the Lea Valley Overground Railway Line and a section of the northern part of Stratford City development site;

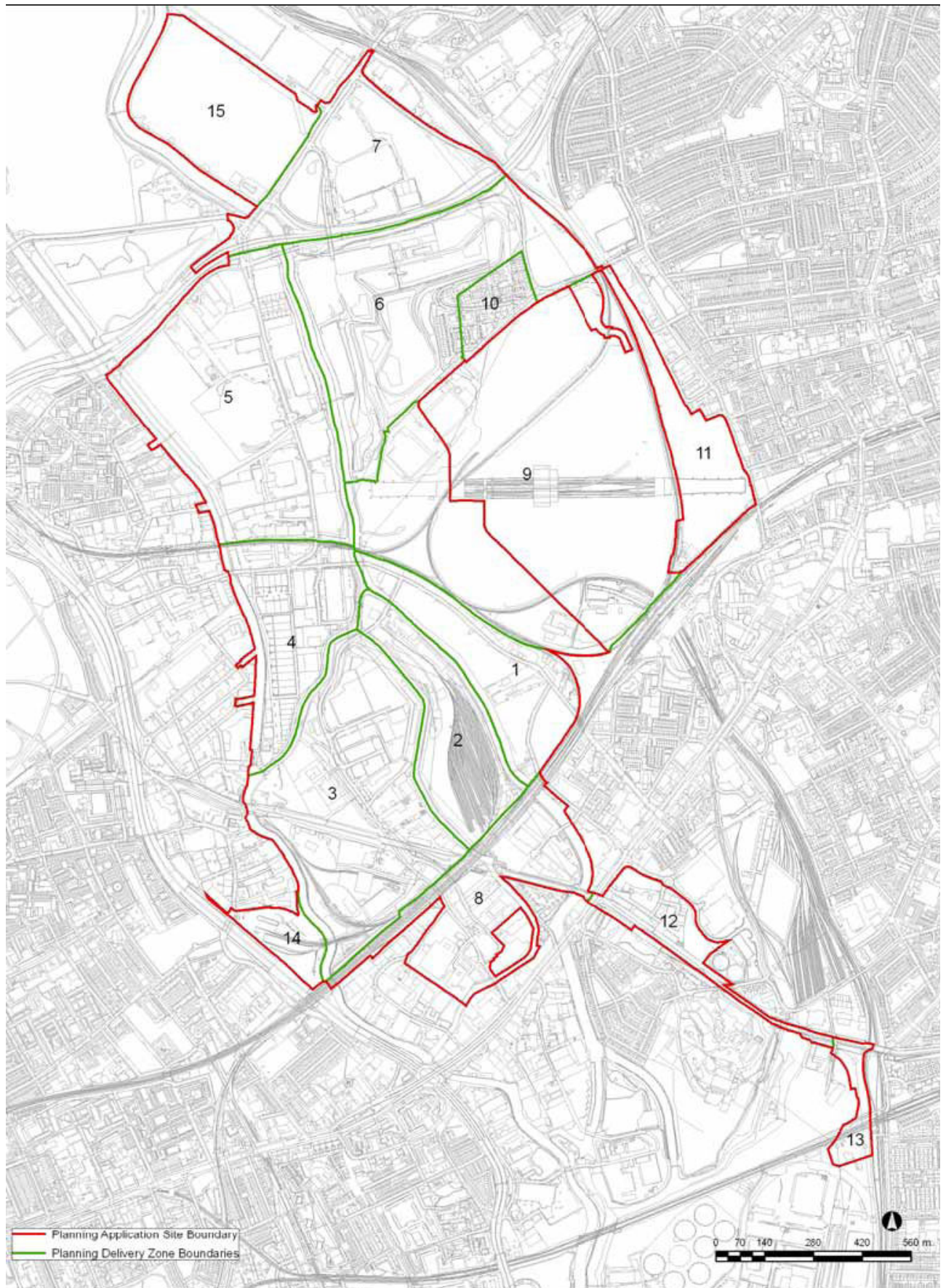
- to the south by part of the northern boundary of the Stratford City development site, land to the north and south of the western end of the Channel Tunnel Rail Link box, part of the land within the western boundary of Stratford City development site, the southern section of the rail loop which connects the North London Line and the Great Eastern Line, the main line railway and land on the eastern bank of the Waterworks River, the Greenway (part), High Street Stratford (A11), Rick Roberts Way and including land to the east of Canning Road, west of the North London Line, and south and west of West Ham station, the land between Bow Back River and Barbers Road and part of the Great Eastern Line;

- to the west by the A12 Blackwall Tunnel Northern Approach Road (part) the River Lea and the River Lea Navigation (Hackney Cut) and land on the western bank of the River Lea to the east of the A12 East Cross Route.

3. Olympic Village (part) and Legacy Residential Planning Application

Temple Mill Lane, Clays Lane and Clays Lane Close, Stratford, London (land to the south and east of the Eastway Cycle Circuit and east of Trafford Close incorporating Clays Lane (part) Clays Lane Close (part) and Temple mill Lane (part) Stratford).

Fig 1. Planning Application Boundary and Planning Delivery Zone Boundaries



Appendix B

Description of Proposals

1. Site Preparation Planning Application

- Bulk earthworks to formation levels (including demolition works, felling of trees, clearance of vegetation);
- Stockpiling of materials and the remediation of land;
- Construction compounds;
- Erection of perimeter enclosure;
- Construction of and works to river walls and works to waterways;
- Construction of and works to roads, means of access and junction alignments;
- Construction of logistic roads and construction bridges and one footbridge substructure;
- Laying of services, service diversions and service protection works; construction of utilities corridor, surface water drainage network and foul water tunnels; and
- Connections to host utilities.

2. Olympic, Paralympic and Legacy Transformation Planning Application

Purposes for the Games:

- Earthworks to finished levels,
- Sports, leisure and entertainment venues within class D2, (including ancillary service areas);
- Olympic Cauldron;
- Open space and circulation areas (involving soft and hard landscaping and associated structures);
- Under and over bridges;
- Utility structures (including wind turbine, pumping stations, electricity substations, telecommunication masts, Channel Tunnel Rail Link cooling box, an Energy Centre (including a Combined Cooling and Heating Plant and biomass boilers);
- Construction of buildings for use within classes A1, A2, A3, A4, A5; and
- Construction of buildings for use as the International Broadcast Centre / Main Press Centre and Multi Storey Car Park;
- Erection of a perimeter enclosure for the period of the works; and
- Temporary coach parking areas.

In the period following the Games, the Legacy Transformation Phase involving:

- Reconfiguration of road network to form Legacy distributor and local roads, cycleways, pedestrian footways and ancillary parking areas;
- Dismantling and reconfiguration to form buildings within classes B1, B2 and B8;
- Partial deconstruction, demolition, dismantling and construction of venues to form legacy sports, leisure and entertainment venues, servicing facilities, car parking, vehicular access and ancillary works for use within classes D1 and D2; and of over and under bridges and buildings and structures (including telecommunication masts);
- Engineering earthworks involving reconfiguration of levels and the laying out to provide permanent public open space (including outdoor sports facilities, play facilities, cycle circuit and ancillary facilities), allotments and sites for future development; and
- Erection of perimeter enclosure.

3. Olympic Village (part) and Legacy Residential Planning Application

Outline application for the redevelopment of Clays Lane Estate Stratford (part) for up to 1252 permanent residential units that will also be used for athlete and related accommodation in connection with the 2012 Olympic Games and Paralympic Games

complementary retail facilities (Use Class A1-A5) associated open space and play facilities, car parking, servicing facilities, vehicular access and ancillary works.

Fig 2. Illustrative Olympic Masterplan

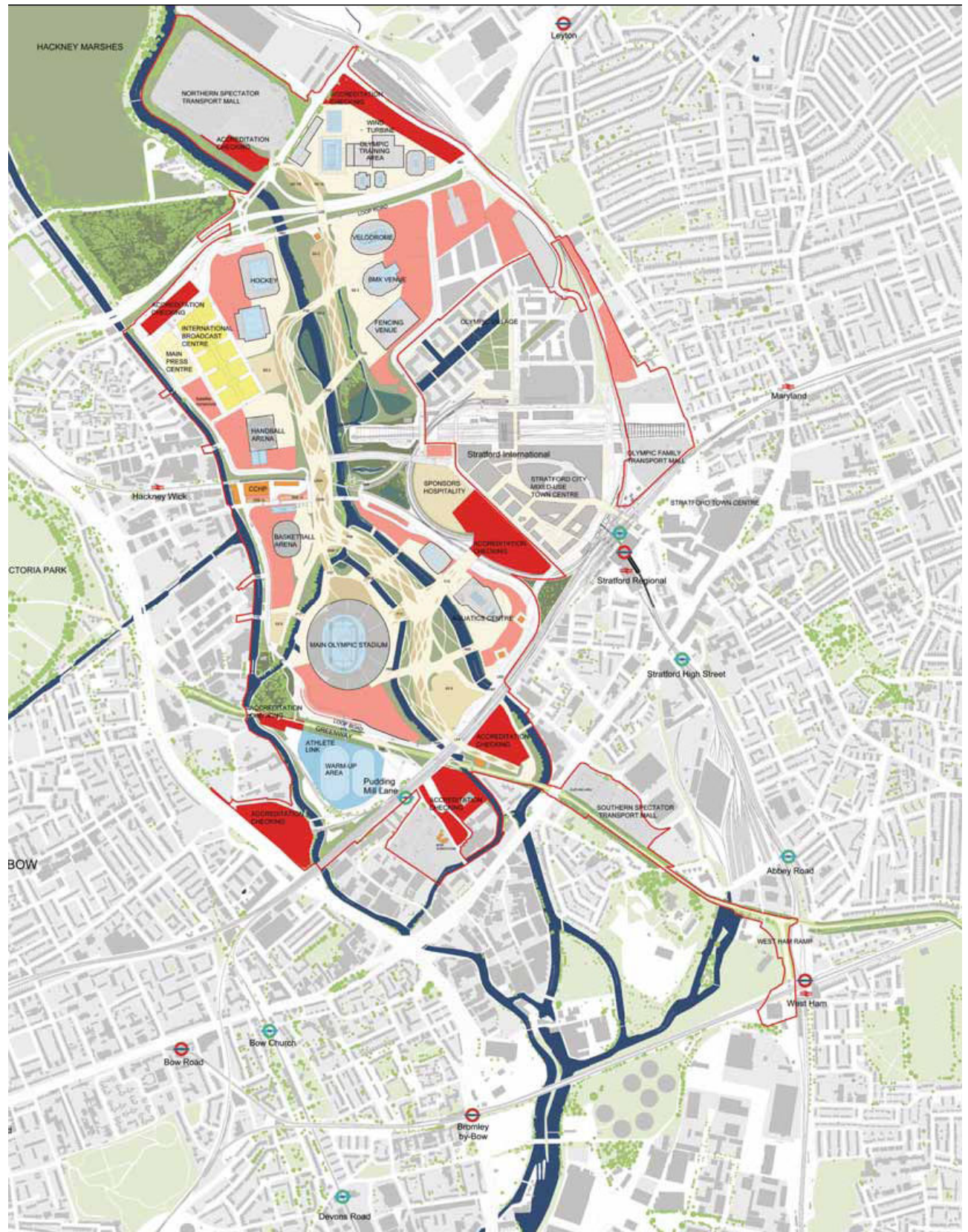
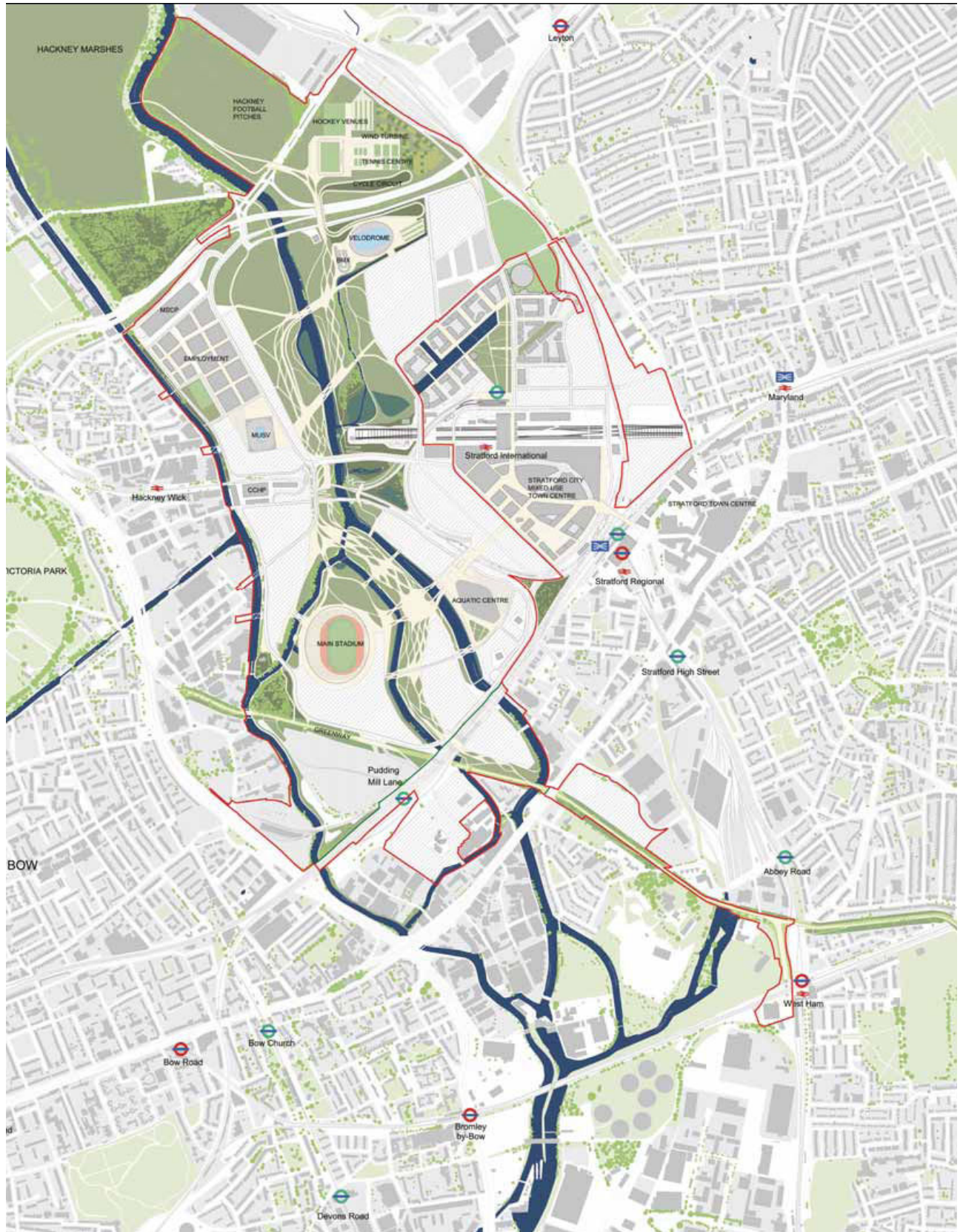


Fig 4. Illustrative Legacy Masterplan



Appendix C

OLYMPIC, PARALYMPIC AND LEGACY TRANSFORMATION PLANNING APPLICATIONS – OVERVIEW OF PLANNING DOCUMENTS

SITE PREPARATION PLANNING APPLICATION	FACILITIES & THEIR LEGACY TRANSFORMATION PLANNING APPLICATION
Volume 1: Planning Explanatory Statement	OLY/GLB/ACC/DOC/EXP/01
Volume 2: Design and Access Statement	OLY/GLB/ACC/DOC/DAS/01A to B
Volume 3: Commitment to Sustainable Regeneration	OLY/GLB/ACC/DOC/CSR/01
Volume 4: Statement of Participation	OLY/GLB/ACC/DOC/SOP/01
Volume 5: Energy Statement	OLY/GLB/ACC/DOC/ENG/01
Volume 6: Application Forms, Schedules, Notices OLY/SP/APP/DOC/APP/01	Volume 9: Application Forms, Schedules, Notices OLY/OLF/APP/DOC/APP/01
Volume 7: Drawings Site Wide Delivery Zones 1 to 10 OLY/SP/APP/DOC/DWG/00 to 10	Volume 10: Drawings Site Wide Delivery Zones 1 to 15 OLY/OLF/APP/DOC/DWG/00 to 15
Volume 8: Remediation Design Statement OLY/SP/APP/DOC/REM/01 to 03	Volume 11: Remediation Design Statement OLY/OLF/APP/DOC/REM/01 to 03
Volume 12: Environmental Statement (ES), Part 1 to 6	OLY/GLB/ACC/DOC/ENV/01A to H
Volume 13: ES Annexure 1: Transport Assessment	OLY/GLB/ACC/DOC/TRA/01A to C
Volume 14: ES Annexure 2: Flood Risk Assessment	OLY/GLB/ACC/DOC/FRA/01A to B
Volume 15: ES Annexure 3: Code of Construction Practice	OLY/GLB/ACC/DOC/CCP/01

OLYMPIC VILLAGE (PART) AND LEGACY RESIDENTIAL
PLANNING APPLICATION

Volume 1: Planning Explanatory Statement

Volume 2: Design and Access Statement

Volume 3 and 4: Statement of Participation

Volume 5: Planning Stage Energy Assessment

Volume 6: Planning Application Folder

Volume 7: Environmental Statement Non Technical Summary and Main Report

Volume 8: Environmental Statement Drawings

Volume 9: Environmental Statement Appendices

Volume 10: Environmental Statement - Transport Assessment Appendix

Appendix D

Table 2.1: Summary of 2004 Olympic and Legacy Planning Permissions

Description		Scope
Permission OLY1	Facilities for the Olympic Games and Associated Events, Infrastructure and Permanent Legacy Uses within the Olympic Site - Regeneration Planning Area A	The main planning permission for the Olympic Park and associated Legacy (OLY1) is in outline but includes certain details in respect of ground engineering, highways access and siting of the Main Stadium.
Permission OLY2	The works and temporary use for a Temporary Northern Coach Drop-off and Coach Parking Facility) to service the Games and associated events and future restoration to playing fields – Regeneration Planning Area A	Planning permission OLY2 is a full planning permission. OLY2 (Temporary Northern Coach drop off) includes development proposals for the Legacy phase.
Permission OLY3	The works and temporary use for a Temporary Southern Coach Drop-off and Coach Parking Facility to service the Games and associated events – Regeneration Planning Area B	Planning permission OLY3 is a full planning permission. OLY3 (Southern Coach drop off) relates to development required during Olympic Games only and does not include Legacy proposals.
Permission OLY4	The works and temporary use for a Temporary Western Coach Drop-off and Coach Parking Facility to service the Games and associated events – Regeneration Planning Area D	Planning permission OLY4 is a full planning permission. OLY4 (Temporary Western Coach drop off) relates to development required during Olympic Games only and does not include Legacy proposals.
Permission OLY5	Construction of the West Ham Ramp to improve access for the Games, associated events and Legacy uses – Regeneration Planning Area B	Planning permission OLY5 is a full planning permission. OLY5 (West Ham Ramp) includes development proposals for the Legacy phase.

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Appendix E

Table 2.2 : Summary Principal Changes to the Olympic and Legacy Masterplan Since 2004

Masterplan Element	Summary of Principal Changes
<p>Venues</p> <p><i>International Broadcast Centre & Main Press Centre</i></p> <p><i>Volleyball</i></p> <p><i>Velodrome & BMX</i></p> <p><i>Fencing</i></p> <p><i>Paralympic Tennis and Archery</i></p> <p><i>Basketball</i></p>	<p>The International Broadcast Centre (IBC) and Main Press Centre (MPC) are relocated from the Pudding Mill Lane area (Delivery Zone 8), to a location at Hackney Wick (Delivery Zone 5). Part of the Pudding Mill Lane area will be used instead for a temporary coach park and associated access and security facilities during the Olympic Games.</p> <p>Volleyball is no longer required in the Olympic Park.</p> <p>The Velodrome and BMX track have been moved to the south of the A12.</p> <p>The incorporation of a temporary Fencing Hall to a site north west of the Athletes' Village.</p> <p>Paralympic Tennis and Archery have been moved to Eton Manor and are retained in Legacy, alongside Hockey facilities.</p> <p>The temporary Basketball Hall has been moved to the western side of the Olympic Park in Delivery Zone 4.</p>
<p>Athletes' Village</p>	<p>The accommodation in the Athletes' Village has been repositioned in the revisions to the masterplan proposals, to provide a closer integration with the Stratford City development and to utilise more of the development permitted under the Stratford City planning permissions than had been envisaged in the masterplan which was granted planning permission in October 2004.</p>
<p>Chobham Farm</p>	<p>The closer integration of the Olympic & Legacy and Stratford City schemes requires the use of those parts of Chobham Farm (to the east of the Stratford City site, Delivery Zone 11) not already required for improvements to highway access to Stratford City.</p>
<p>Temporary Coach Facilities</p>	<p>Refinement to approaches for access, movement and security, which have reduced the scale of land required for the Olympic & Legacy development in comparison to the proposals permitted in 2004. These include:</p> <ul style="list-style-type: none"> • The majority of VIP and sponsors' car and coach parking is removed from Fish Island South except those areas of Bow Midland West which are still required for Olympic purposes but will be returned to the current use following the Games. The car and coach parking are temporary uses required for the duration of the Games and for this period would now utilise already permitted car parking facilities within Zone 1 of Stratford City, and for coaches on land in the area known as Chobham Farm immediately to the east of the Stratford City development site. • Temporary Southern Coach Drop Off and Parking Facility - Revisions to the masterplan proposals have also involved reworking of the temporary Southern coach drop off and parking facilities (Delivery Zone 12) to make the layout more land efficient.
<p>Renewable Energy & Utilities</p>	<p>The adoption of more sustainable approaches, including promoting renewable energy through the introduction of a wind turbine, revised proposals for an energy centre including a biomass facility at Kings Yard.</p>

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Appendix F

The Site

1./2. Site Preparation Planning Application/ Olympic, Paralympic and Legacy Transformation Planning Application

The Olympic Park is located within the Lower Lea Valley in East London. The Lower Lea Valley comprises land along the Lea River between Hackney Marshes in the north to the mouth of the River Lea at the Thames opposite the Greenwich Peninsula in the south.

The character of the Lower Lea Valley is generally built up, and with the dominant land use being industrial with a significant number of under-utilised, abandoned and derelict sites and buildings. The area is also traversed by transport and utility infrastructure.

To the west of the Lower Lea Valley are the neighbourhoods of Bow and Poplar, located in Tower Hamlets, and the south-eastern part of Hackney (Hackney Wick); to the east are Stratford and West Ham in Newham, and Leyton in Waltham Forest.

The area suffers from a high level of socio-economic deprivation, with high unemployment poor health, and high crime rates. The population in the area is generally younger than average, is ethnically diverse and includes a higher proportion of black and ethnic minorities than average, and has a high level of transience.

The application site of the Olympic Park is characterised by significant areas of vacant and derelict sites. In combination these create a poor quality physical environment.

The site includes approximately 90 hectares of open space. Some open spaces have amenity and recreational value, although many are fragmented, of poor quality, have poor access, or are not publicly accessible.

The Lower Lea Valley and Clays Lane site is currently visually dominated by overhead high voltage power lines. Work is currently underway to underground the power lines to provide a more attractive visual environment for the area.

3. Olympic Village (part) and Legacy Residential Planning Application

The Clays Lane housing estate is located adjacent to Temple Mill Lane in the LB of Newham. The site is located between the former Stratford rail lands and the Eastway cycle circuit. The site is situated in the Lower Lea Valley.

The existing Clays Lanes estate has a site area of 5.2 hectares and comprises 450 two and three storey residential units, many of which are currently vacant. Two tower blocks are located to the western end of the site. These towers were once occupied by the University of East London and are currently vacant.

At the south side of the site is a managed Estate for travellers and English Romany Gypsies. The site is owned by the LB of Newham and comprises 15 pitches, and a workshop.

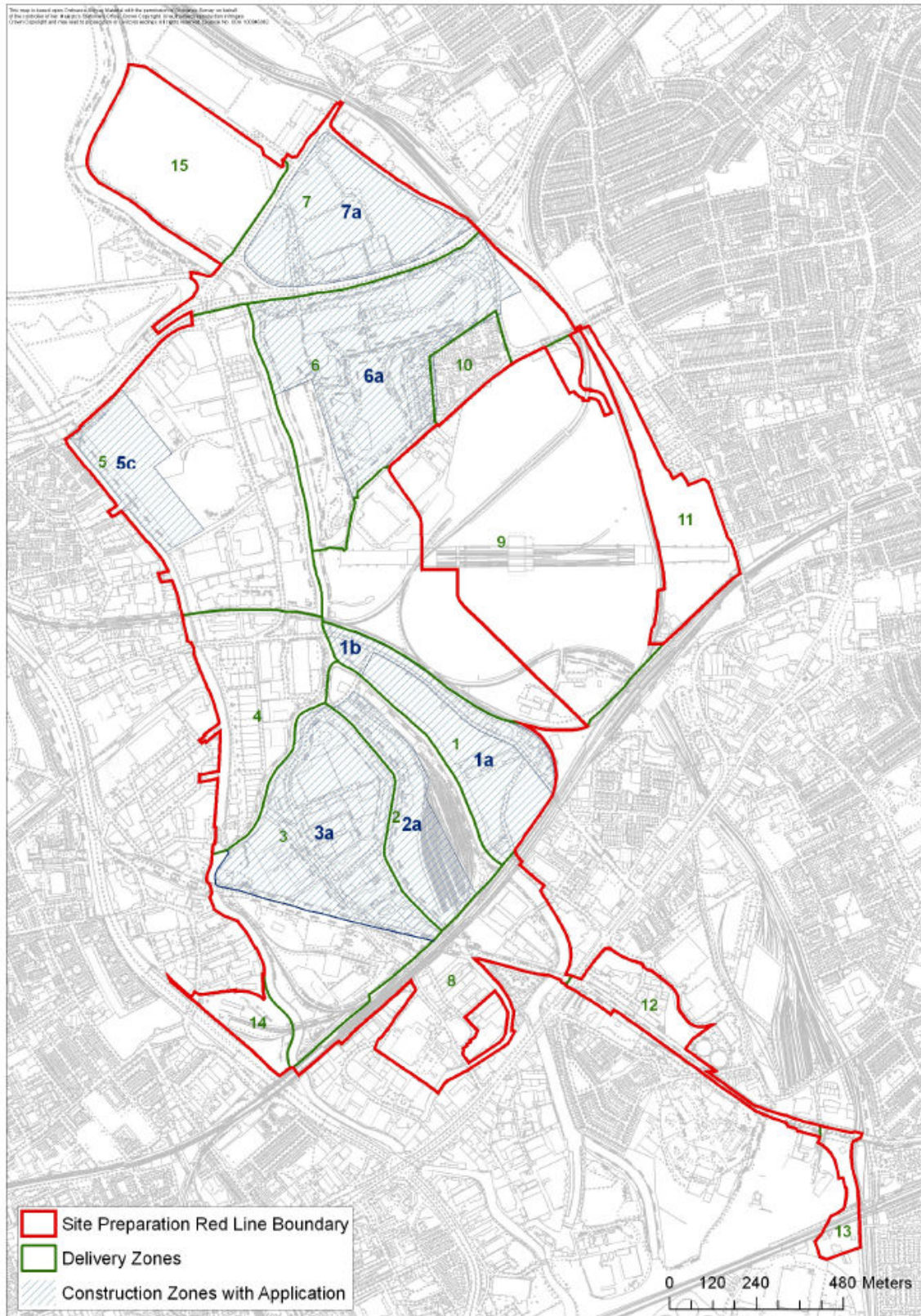
Although the site is presently in residential use and analysis of the history of the site and previous land uses results in a high risk of ground contamination. A substantial amount of remediation is required for the land to be suitable for residential development.

The Stratford City Development which is located to the south of the Clays Lane site was granted permission by the LB of Newham in February 2005. The Stratford City Development proposes

major residential development adjacent to the Clays Lane Estate as well as associated social and community, educational and health facilities.

Appendix G

Planning Application Boundary, Planning Delivery Zones and Advanced Application Construction Zones



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Appendix H

Description of Olympic Village (part) and Legacy Residential Planning Application

The outline application reserves all matters for future determination, i.e., scale, layout, access, landscaping and appearance.

Outline consent is sought for: The redevelopment of Clays Lane Estate Stratford (part) for up to 1252 permanent residential units that will also be used for athlete and related accommodation in connection with the 2012 Olympic Games and Paralympic Games complementary retail facilities (Use Class A1-A5) associated open space and play facilities, car parking, servicing facilities, vehicular access and ancillary works.

The application proposes buildings ranging in height from 4 to 15 storeys. The 15 storey residential tower is strategically positioned on the site to form a landmark building.

The floor space proposed is provided as follows:

	m2
Residential (C3) / Temporary Residential Institutional (C2)	125,000
Retail (A1-A5)	2,000

In addition to the built floor space the legacy/post Olympic permanent development will feature a series of open spaces with a minimum area of 15,000m². This open space will feature play space and games areas.

The proposed residential component will feature affordable housing of up to 50%, subject to funding.

Car parking within the permanent development would comprise 0.7 spaces per dwelling for residential and 1 space per 28m² for retail. Car parking would be provided within basement car parks or at grade (on street).

During the Olympic and Paralympic games the Olympic village will form the northern park of the site and consent is sought to permit the temporary occupation for this purpose. The number of people to be housed within the buildings during the Olympic and Paralympic games shall not exceed 5347.

The earthworks associated with this application require full approval and are contained within the Site Preparation application.

The proposed unit mix is provided below and is subject to viability.

	Unit Split %	Habitable Rooms Split %	Floor space Split %
% Market Units	50%	52%	57%
% Social Rent Units	33%	33%	30%
% Intermediate Units	17%	15%	13%
% Affordable Housing	50%	48%	43%
% Affordable Social	65%	69%	70%
% Affordable Intermediate	35%	31%	30%
% Family Housing	24.76%	34.35%	35.61%

		Unit Sizes (m2)	Split	No. Hab Rooms	No. Total Units
Market	Studio	35	0%	1	
	1 bed	53	20%	2	125
	2 bed	74.3	50%	3	313
	3 bed	102.2	25%	4	157
	4 bed	185.8	5%	5	31
	Average/Total		100%	2.96	626
Social Rent	1 bed	46	24%	2	100
	2 bed	66	49%	3	200
	3 bed	80	17%	4	69
	4 bed	96	10%	5	40
	Average/Total		100%	3.12	409
Intermediate	1 bed	41	44%	2	95
	2 bed	60	50%	3	109
	3 bed	75	6%	4	13
	Average/Total		100%	2.62	217

The site has an area of 5.2 hectares and result in approximately 240 dwellings and 734 habitable rooms per hectare. Excluding the posed alterations to Temple Mill Lane the site would have an area of 3.34 hectares and provides densities of 335 dph or 1020 HRH. The proposals are in the upper portions of the density range identified in the London Plan and Newham Planning Policies however can be justified given the role that the village plays in the Olympic Games and the ability to house athletes and supporting staff on site, coupled with high quality design and commitments to sustainability.

As explained above the layout of the site is formed by a series of external relationships to provide the best possible connectivity to the surrounding road, pedestrian and cycle network. The south triangular block provides a frontage to West Temple mill with the tall element providing a landmark at this strategic location. To the north three plots are dimensioned to incorporate buildings that vary in height, form and style, incorporating residential courtyards and public open space areas. The plots are configured in a north south orientation to optimise sun and daylight opportunities.

Appendix I

RESPONSE TO THE OLYMPICS PLANNING APPLICATIONS

Making the best possible use of the waterways

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SECTION A

Overview

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- 2. Problems that need to be addressed**
- 3. Possible solutions**

SECTION B

Detailed response

- 1. Context**
- 2. Enabling and construction works**
- 3. Legacy**
- 4. Naturalisation and bridges**
- 5. Waste, recyclates and energy plant**
- 6. Passenger transport**
- 7. Leisure and recreation.**

APPENDIX I

- 1. Extracts from policy documents**
- 2. Waterway access to Olympic sites**

Prepared for Dr Tim Williams, London Borough of Tower Hamlets

Produced by Jonathan Rosenberg and Gerry Heward February 2007

RESPONSE TO THE OLYMPICS PLANNING APPLICATIONS

Making the best possible use of the waterways

Summary

We have reviewed the Olympics planning applications in respect of the future use of the waterways as an active part of the proposals for the Olympics and the development of a Water City in the Legacy period.

The proposals to transform the waterways are welcome. However insufficient attention has been given to practical options for providing access to the waterways as part of the aspirations to use them for freight, passengers and recreation.

SECTION A

OVERVIEW

1. Aspects that are welcome

1. The recognition of the importance of the waterways and watercourses in the future life of the area (referenced throughout the Planning Application Documents)
2. The commitment to significant investment to transform the character of the waterways (referenced throughout the Planning Application Documents)
3. The aspiration to use the waterways for the transport of construction materials and waste (Volume 12B Environmental Statement Part 2 – Descriptions of Proposals 3.1.133, 3.3.137 – 3.3.139)
4. The recognition of potential for passenger traffic for the Games (Volume 13A: ES Annexure 1: Transport Assessment 6.18 Water Transport)
5. The recognition of the opportunity presented by the construction of Prescott Lock (Volume 12B Environmental Statement Part 2 – Descriptions of Proposals 7.4.11 -7.4.16)
6. The option to import fuel for the Energy Plant via the canal (Volume 12B Environmental Statement Part 2 – Descriptions of Proposals 3.3.106)
7. Recognition of the potential in the Legacy phase for a waste transfer and treatment station within the IPC/MBC building with access to wharfage (Volume 12B Environmental Statement Part 2 – Descriptions of Proposals 3.8.21)

2. Problems that need to be addressed

1. The reduced access resulting from the plans to naturalise the banks of the waterways. (Volume 6 – Site Preparation Planning Application Forms, Schedules and Certificate) There is a danger that whilst the appearance and ecological habitat of the waterways will be transformed for the better, this will be at the expense of materials and people being able to get onto the waterways. This could lead to a failure of the waterspaces through inactivity and lack of use
2. The absence of any firm proposals to arrange site organisation to facilitate use of the waterways to import construction materials. The danger is that the way the sites are organised within the Park will not facilitate water transport
3. The failure to link the removal of demolition and construction waste to suitable waterside locations to facilitate barge transport for onward disposal
4. The absence of proposals to establish infrastructure – piers, wharves or landing stages - that would allow for water transport

5. The absence of proposals to move people and goods on the waterways **within** the Park
6. The lack of plans to establish essential waterway infrastructure for use in the Legacy period
7. Wood fuel destined for the proposed Biomass Plant at Kings Yard will require suitable access points on the waterway network so that the material can be loaded onto barges.
8. Methods for transporting waste to the potential waste transfer station in Legacy at the former IPC/MBC are not identified
9. The use of 'back of house' areas for handling waste in operation during the Games and Legacy (Volume 12B Environmental Statement Part 2 – Descriptions of Proposals 3.8.20) could exclude the option of using water transport

3. Possible solutions

1. A number of wharves could be designed into the plans to provide connections to the construction sites for water freight to enable delivery of aggregates from the Thames and infrastructure materials from the Lee Navigation
2. A wharf located near the railhead at Bow Midland (St Clement's Wharf) could be used to facilitate the onward transfer by barge of materials arriving by rail to construction sites within the Park
3. On site construction facilities such as concrete batching plants and reception areas should be located so as to receive raw materials and construction materials straight from the waterways and to be able to send out construction waste
4. Piers located at strategic points would provide access to the venues for transporting passengers on the waterways within the Park
5. Waste generated on site during the Games could be removed via the wharves and piers on barges rather than lorries. Access to waterways should be one of the factors involved in choosing the locations for the waste management areas
6. Wharves and piers built for the Olympics can continue into the legacy period and be used in connection with future industrial and residential development
7. Locations for a marina and moorings should be considered so that the waterways can be enjoyed in the legacy period for leisure and recreation
8. Sources supplying wood fuel for the Biomass Plant should, if possible, be adjacent to the waterway network and access onto the waterways should be identified or created to allow road sourced fuel to transfer to barge
9. The streams of demolition and construction waste that will have to exit the Park should be identified with a view to transporting them by water – i.e. metal waste could be taken by barge to EMR at Bow Creek. As far as possible designated waste skip collection points should be located waterside to provide the option for removal by barge.

SECTION B

DETAILED RESPONSE

In order to comment in detail on the aspects of the planning applications that relate to use of the waterways this response is presented according to the following topics:

1. Context
2. Enabling and construction works
3. Legacy
4. Naturalisation and bridges
5. Waste, recyclates and energy plant
6. Passenger transport
7. Leisure and recreation.

1. Context

1.1 Policy framework

The LLV Regeneration Strategy (LLV RS) provides a context and basis for the Olympics proposals. This is augmented by the ODA Sustainable Development Strategy (LLV SDS). The LLV RS is made up of two core documents – the Lower Lea Valley Vision (LLVV) and the Lower Lea Valley OAPF (LLV OAPF).

Together these three documents envisage use of the waterways for freight – particularly associated with construction and waste including green and environmental industries – and for passenger transport, leisure and recreation. Key extracts are set out in Appendix 1.

1.2 Advantages of using water transport

London Plan Policy 4C.14 is designed to promote sustainable transport and help reduce congestion and the impact of goods vehicles on London's roads: "The Mayor will and boroughs should support new development and facilities that increase the use of the Blue Ribbon Network to transport freight and general goods especially in areas of deficiency."

Policy 4C.28 in the Draft Further Alterations to the London Plan states: "Wherever possible, new developments adjacent to canals should maximise the use of water for the transport of construction materials and for the removal of waste from site."

Tower Hamlets UDP Policy ST33 is: "To reduce the impact the impact of heavy lorry traffic by promoting greater use of rail and water for the movement of freight."

Using waterways for freight transport can make a significant contribution to reducing negative impact on the environment through:

- Lower fuel consumption
- Reduction by around 80% of carbon put into the atmosphere
- Reduction by around 35% of nitrogen oxide put into the atmosphere

(Source: The Case for Water: Why transporting freight by water is good for the environment and good for the economy, Sea and Water 2006)

LB Tower Hamlets is anxious to ensure that the greatest possible use is made of the waterways for the movement of materials to and from the sites and that full advantage is taken of the new Prescott Lock. As the Transport Assessment points out at 5.4.3, using alternative and more sustainable transport modes “will increase the reliability and delivery whilst minimising the impact on surrounding communities” through a reduction in road transport.

LB Tower Hamlets is also keen to ensure that the Olympics development includes the installation of waterway related infrastructure – providing access onto the water itself - that will be an essential part of the delivering a Water City in the Legacy period.

2. Enabling and construction works – Olympics and Legacy

2.1 Waterway access

Through the Transport Assessment (Volume 13A) and LLV SDS the ODA aspires for at least 50 per cent of materials, by weight, to be transported to and from the Olympics Park by water or rail during construction. This would be facilitated by the construction of a lock at the entrance to the Prescott Channel. This lock would enable 350 tonne barges to access the site via the Waterworks River to service construction sites to the east and west of the Waterworks River.

Additional construction sites can be accessed using 120 tonne barges via the Lee Navigation and Bow Backs (including Old River Lea, City Mill River and Bow Back River), although the planning application documents refer to a capacity of 100 tons. River Lea barges were designed in two sizes of 120 tons and 140 tons. Appendix 2 to this report lists the various venues in the Olympic Park showing which waterways provide access.

The Transport Assessment at paragraph 4.9.2 states: “The final section of the Lea itself (Bow Creek) is tidal and is only suitable for navigation at certain times of the year.” This statement is misleading. Bow Creek is indeed tidal which means it is only navigable for approximately four hours, twice a day, a total of around eight hours in every 24. It is not correct to say that it is only suitable for navigation at certain times of the year, as it is navigable all year round.

2.2 Site access from waterways

Appendix 2 identifies the sites within the Park that are currently accessible from the non tidal and tidal waterways. However, the ease and facility with which the waterways can be accessed will be significantly compromised by the naturalisation plans unless wharfage is installed at locations where this treatment will be undertaken. It will be important to relate water freight access to places where future employment and industry will be located and to road access to allow intermodal transfer particularly for waste and recyclates. Similarly, piers and moorings should be located near to where residential development will take place so residents can access the waterways for transport and recreation.

The existing Lee Navigation and the Bow Backs can be used with immediate effect for infrastructure deliveries from the north e.g. Burdens and for waste removal to and aggregates deliveries from the Thames via Bow Creek. The reinstatement of City Mill Lock would give limited access to the Waterworks River from the Bow Backs in advance of the completion of Prescott Lock. Hence, it is not strictly accurate to say

(Volume 12B Environmental Statement Part 2 – Descriptions of Proposals 3.3.139) that “there will be no opportunity to use river transport for the first two years”.

2.3 Construction and demolition waste

Construction and demolition waste leaving the Park will be limited due to the strategy to minimise waste and to reuse as much as possible on site. However, material that does have to be removed from the area can travel by water to a number of possible destinations including:

Bywaters, Twelvetrees Crescent at Bow Creek
Hanson, North Greenwich at Victoria Deep Wharf
McGraths at Barking Creek
Powerday, Willesden on the Paddington Arm (Grand Union)
Ethos, Trout Road on the Slough Arm (Grand Union)
Contaminated waste could be taken to Hanson/Keltbray Walsh (Victoria Deep Wharf) or Powerday (Old Oak Wharf, Willesden) for treatment.
EMR at Thames Wharf, Bow Creek could receive scrap metal

2.4 Construction materials

Materials can be brought directly into the area by water and if necessary moved around the site by barge. Materials, particularly hardstone, could also be brought in by rail to the railheads at Bow and could be transferred onto barges for onward delivery to sites. At Bow East (also referred to as Bow Midland) the rail line passes parallel and close to the Lee Navigation at St Clement’s Wharf. This would give direct access to the Bow Back Loop (sites 1-9 in Appendix 2) where material can be delivered to a number of locations without having to pass through any locks.

Materials coming into the site will include aggregates for ground works and concrete. These can in the main be supplied via the Thames although there is also the possibility of supplying materials from Burden on the Lee Navigation to the north of the Park.

Sources for aggregates from the Thames via Bow Creek include:

- Hanson – Victoria Deep and Dagenham Dock
- Cemex – Angerstein Wharf
- United Marine Aggregates – Murphy’s Wharf at Charlton

Sources for cement from the Thames via Bow Creek include:

- Lafarge – Bevans Wharf at Northfleet
- Castle Cement – Thurrock Marine Terminal at West Thurrock

Sources for steel from the Thames via Bow Creek include:

- Kierbeck – Keirbeck Wharf, River Road Barking Creek
- Arcelor Group – Welbeck Wharf, River Road Barking Creek

Groundwork’s and infrastructure materials (paving and drainage)

- Burdens – Picketts Lock on Lee Navigation (Burdens are proposing they could use their site as a consolidation centre for other companies who may wish to supply materials for the Olympics).

The most efficient means to maximise use of the waterways would be through the location of concrete batching plants waterside. Raw materials could be delivered by barge and mixed on site. A number of delivery points should be identified where material could be offloaded at the main centres of construction for use in the immediate vicinity or for onward transfer.

3. Legacy

3.1 Waterside infrastructure

Paragraph 8.16.1 of the Transport Assessment states: “The Legacy of the Olympic Games will include the regeneration of waterside infrastructure within the immediate Olympic/Legacy Park area. . . The Legacy proposals will enhance water travel and cycle/walking networks.”

Aside from the new lock at Prescott Channel, it is unclear what the regeneration of waterside infrastructure would entail, as no specific proposals are laid out. Were this to include the provision of wharves to handle materials for the construction phase this would provide a basis for using the waterways in the future for commercial freight and for passenger use. Hence the use of the waterways beyond the Olympics depends on putting infrastructure in place for the Olympics and incorporating it into the design of the Park and/or making provision for this in the Legacy phase.

4. Naturalisation and bridges

4.1 The impact of naturalisation works on navigation

The LLV OAPF promotes naturalisation of the banks so long as this does not compromise navigation and transport potential including the ability to transport construction and waste material to and from the site (see Appendix 1).

In principle, so as to retain navigational use of the waterways naturalisation should be undertaken so as not to compromise future use of the waterways by vessels, be they freight barges, passenger or recreational vessels. Breaking out of the banks and the installation of vegetation should not reduce the width of the navigation or prejudice safe navigation on bends or at bridge holes or compromise the ability to land at wharves and moorings. Naturalisation of the banks should not result in a requirement for vessels to slow down in order to navigate safely past them and without causing erosion to the bank.

However, the detailed plans for naturalisation appear to compromise future use of the waterways by vessels as they remove the ability for vessels to land so as to load or offload goods and people. The installation of wharves and piers would mean that naturalisation could be undertaken whilst also providing vessels with access to the land. The detail with respect to each Planning Delivery Zone is set out below. It is not clear from the plans whether naturalisation will compromise the ability of vessels to navigate safely past the naturalised areas with having to slow down and without causing erosion.

PDZ 1 Naturalisation of east bank of Waterworks River and River Lea for 800m. Without a pier or other structure these works preclude access by barges to this stretch of bank as the shelf will obstruct vessels approaching the side. Effectively the river will be distanced from the bank by more than 8m, requiring a reach of around 12m for a machine to load/unload. The line of sight for the machine operator will be very poor as he will be so far back from the barge he will be unable to see into the hold. Potentially this could impact on use of the waterway to transport materials in connection with the construction of the Aquatics Centre; Sponsor's Village, the Loop Road and associated parking areas. This issue could be redressed by the provision of one or two landing stages along this stretch that could be retained during and beyond the Olympics.

PDZ 2 Naturalisation of west bank of City Mill River. The removal of the existing wall and installation of a sloped bank will preclude vessels approaching the side. This could impact on use of the waterway to transport materials in connection with the construction of the Olympic Stadium and adjacent roads and servicing area. This could be redressed by installation of a landing stage or wharf in the vicinity.

PDZ 3 The plans do not appear to compromise water transport. This waterway can be used for the construction of the Olympic stadium, the Loop Road and the Warm up and Athletics tracks and the various bridges.

PDZ 4 The plans do not appear to compromise water transport. Installation of a wharf on the western bank (right bank) of the Old River Lea would provide water transport access to PDZ 4.

PDZ 5 & 6 Naturalisation of both banks of the River Lea for 700 to 890m and creation of wetlands. This will compromise water transport's ability to carry materials in connection with the construction of the Velodrome, BMX track, Fencing Hall, Hockey and Handball Arenas as well as the Olympic Park Roads. This could be redressed by the installation of wharves or landing stages – at least one each bank.

PDZ 7 & 15 Naturalisation of east bank of River Lea. This will compromise access for water transport to deliver materials for the construction of the Northern Spectator Transport Mall and Athletes Training Area.

PDZ 8 The plans do not appear to compromise water transport. Material delivered to this area could be moved onwards by way of the internal road system.

PDZ 9 Naturalisation of east bank of River Lea. This would compromise access to the Olympic Village. A wharf at this point, more or less opposite Carpenters Road Lock would be useful for the Olympics and legacy period.

Volume 2A Design and Access Statement 7.4.7 suggests “the vertical river walls of the left bank of the River Lea and the right bank of City Mills can be replaced by a naturalised soft river bank.” Without provision of landing stages or wharves this will preclude land access from these sections of waterway for water transport in the legacy phase.

4.2 Bridge profiles and locations – impact on navigation

In principle bridge profiles should be designed to allow for the passage of vessels laden with containers and bridge locations should not present visual or physical obstructions to navigation. Volume 2A Design and Access Statement 7.11.2 states bridge clearances allow for the required navigational clearance.

It has not been possible to examine the precise bridge designs. The majority of freight transport is by way of containers which are an efficient and economic means of transport materials. To ensure the Legacy is designed to cater for modern transport requirements, clearances and profiles of bridges that will be retained need to be designed to allow the passage of vessels carrying empty containers. Slopes on the bridges could narrow navigation under the bridge. Furthermore, any bridge foundations sunk into the channel will need to be fendered. Bridge abutments need to allow for the passage of barges up to 7.5m beam on the Waterworks River and 6.1m beam on the Lea Navigation.

5. Waste and recyclates and energy plant

5.1 Waste and recyclates

The Legacy proposals as indicated in the LLV OAPF envisage five core industrial areas stretching up the Lea Valley from Bow Creek to Lea Bridge. These will be preferred locations for green and environmental industries including waste and recycling. There are also a number of areas identified for intensive residential development. These developments will generate waste and recyclates which could be transported to destinations both within and outside the Valley using water transport.

Ideally, any waterside infrastructure that is installed for the Olympics should be capable of being used later for water transport of freight. The increase in recycling is adding pressure to the road network through the greater number of journeys involved in moving material around. Use of the waterways for commercial freight both inside and outside of Tower Hamlets will benefit the Borough by reducing road transport in the area and the associated impacts of congestion, accidents and pollution.

5.2 Energy plant

Material destined for the proposed Biomass Plant at Kings Yard will require suitable access points on the waterway network so that the material can be loaded onto barges.

6. Passenger transport

Much of the new housing proposed in the LLV OAPF will be located on the waterways, a considerable amount of which will be in Tower Hamlets. Potential connections with rail and Underground include Pudding Mill Lane, Hackney Wick and Bromley by Bow. Water based passenger traffic needs to be facilitated through the installation of landing stages at strategic points.

7. Leisure and recreation

Proposals for using the waterways should seek to reactivate the waterways themselves as well as improving facilities for walking and cycling. The LLV OAPF envisages waterside sites being developed for active uses including boat servicing, river maintenance and canal boat facilities, and provision for rowing boats, canoes, and barge moorings for visitors and residential moorings.

It is unclear at this stage where these facilities would be located and how they would relate to future residential development and the creation of additional parkland. Nor is it clear how the network of canals and rivers would be made more welcoming to boat users. There is a danger that naturalisation proposals could compromise the achievement of these objectives.

APPENDIX 1 - EXTRACTS FROM POLICY DOCUMENTS

Extract from the Commitment to Sustainable Regeneration

“The 2004 Olympic and Legacy Planning Permission (O&LPP) required the submission and approval of a Lower Lea Valley Regeneration Strategy to demonstrate how the implementation of the Games could act as a catalyst for the regeneration of the wider Lower Lea Valley before development for the Games could commence, including any site remediation and enabling works. This Regeneration Strategy was commissioned by the LDA to cover the whole of the Lower Lea Valley around and beyond the Olympic Park, running from the A12 Eastway Crossing at Hackney marshes to the River Thames at Lea Mouth. The Strategy was published and endorsed by stakeholders in January 2007 and comprises two core documents: The Lower Lea Valley Opportunity Area Planning Framework and the Lower Lea Valley Vision.

The Regeneration Strategy has established the context for the delivery of the 2012 Olympic and Paralympic Games as a regeneration catalyst, as well as the potential quantum, shape and form of future development across the Lower Lea Valley.” (Olympic and Paralympic & Legacy Transformation Planning Applications, Volume 3 Commitment to Sustainable Regeneration P.11)

Extracts from the LLV OAPF

“A2 Opportunities to upgrade the waterways that do not compromise the flood defence role, transport potential, landscape character and ecological value of the river corridor and associated floodplain of the LLV should be supported.

2.28 Subject to London Plan policy 4C.15 which protects Safeguarded Wharves for cargo-handling uses, development proposals on waterside sites should seek to incorporate, where appropriate, active uses including boat servicing, river maintenance and canal boat facilities, and provision for rowing boats, canoes, and barge moorings for visitors and residential moorings. Development proposals will also need to be in accordance with London Plan Policies 4C.18 and 4C.19 on Support Facilities and Activities in the Blue Ribbon Network and Mooring facilities.

2.92 The approach to land use set out in the OAPF is to retain and intensify industrial and employment development in locations that are in close proximity to road, rail and water freight systems to take advantage of good connectivity (and minimise industrial congestion in other areas).

2.117 Land and premises at, or appropriately relocated to, river and rail locations (including Safeguarded Wharves) should be safeguarded to secure industries and facilities that are centred on recycling, the processing of locally produced waste and energy production.

E6 Development proposals in the LLV should seek to maximise the use of rail and water transport for freight and other related purposes.

2.141 Development proposals should actively investigate ways of using the rail and waterway network in the LLV to transport construction and waste materials from/to the Olympic site and other development sites and as part of the long term sustainable transport network in the LLV. Any proposals for de-canalisation, naturalisation and improved public access to waterside land should not preclude this possibility.

2.168 Sites for waste management and disposal should be identified with regard to proximity to source of waste, the nature of activity proposed and its scale, the environmental impact on surrounding areas, particularly how material is transported to and from the site, the use of rail and water transport, and using sites that are located in Preferred Industrial Locations or existing waste management locations.

4.192 Waterways: Development in the sub-area should include, or contribute towards local interventions to provide:

- Substantial naturalisation of the eastern bank of the River Lea in this area to create a wildlife corridor, either through breaking out the existing canal walls and re-grading the banks, or through constructing terraces within the watercourse where this has no negative impact on navigation.”

Extracts from the Lower Lea Valley Vision

“Delivering a Water City

The approach to the waterways includes the implementation of projects specifically related to encouraging more active use both for commercial and leisure uses and to improve ecological value.

This is proposed to incorporate:

- Enhanced use of the waterways and wharves for freight and industrial use;
- Enhanced use of the waterways for leisure and recreation;
- New canal basins, boat moorings and water courses to enhance the waterside character of the Lower Lea Valley;
- Integration of natural drainage and flood alleviation features; and, Improved water quality.” (Page 9)

Extracts from ODA Sustainable Development Strategy

“The waterways present an opportunity for leisure and commercial transport, environmental enhancement and public access and amenity. The ODA has been working with British Waterways, the Environment Agency, English Nature and the London Thames Gateway Development Corporation to develop a proposal for the reinstatement of a water control structure in the Prescott Channel. This proposal, which would be delivered by British Waterways, would allow for the delivery of some of the construction materials to the Olympic Park site as well as the removal of some of the waste materials by water”. (Page 29)

“The ODA is also working closely with British Waterways, Transport for London, the Department of Transport and the Port of London Authority to create opportunities to transport materials by water. This would be facilitated by the water level control of the waterways through a proposed lock installed in the Prescott Channel”. (Page 38)

“The ODA aspires for at least 50 per cent of materials, by weight, to be transported to and from the Olympic Park by water or rail during construction.” (Page 39)

APPENDIX 2 – WATERWAYS ACCESS TO OLYMPIC SITES

Table 1: Olympics sites accessible from the Bow Backs and the Lee Navigation

Site No.	Olympic Sector	Description	Non tidal Waterway	Current road access
1	Car park	Bounded to the west by Lee Navigation, to south and East by the Bow Backs with railway to the north	Bow Back River	Cooks Road to the west and Pudding Mill Lane to the East
2	Transport interchange and security check area	Bounded by City Mill River to East and South, Marshgate Lane to West and the railway line and Northern Outfall Sewer to the north	City Mill River	Marshgate Lane, Pudding Mill Lane
3	Eastern Security check area	Bounded to west by City Mill River, to east by Waterworks River (tidal), bounded to north by railway and to south by northern outfall sewer	City Mill River to west	Bridgewater Road
4	Western Security Check Area	Bow West railheads. Bounded to east by Lee Navigation, to south by railway line, to the west by the Blackwall Tunnel Northern Approach	Lee Navigation	Wick Lane
5	Warm up and athletics track	At Bow East. River Lee Navigation to west, northern sewer outfall to north, railway to south.	Lee Navigation	Marshgate Lane
6	Food Hall southeast	Bounded to east by waterworks river, to south by railway line	City Mill River	Check if road access?
7	Food Hall west	Bounded to east by the Old River Lea, to the west by Lee Navigation	Lee Navigation on west Old River Lee on east	Bow Ind. Park Rd off White Post Lane
8	Main Stadium and service area	Bounded to the east by City Mill River, to south by northern sewer outfall and to west by Old River Lee	Old River Lea on West, City Mill River to east	Marshgate Lane
9	Basketball Arena and service area	Bounded to the north by railway line, to east by Waterworks River, to south by Old River Lea, to west by Lea Navigation	Old River Lea Lee Navigation	Carpenters Road
10	Handball Arena and service area	Bounded to east by Waterworks River (Bowling Alley), to south by railway line, to west by Lee Navigation and to north by A12	Lee Navigation	East Cross Centre off Waterden Road

Handball Arena and service area	Bounded to east by Waterworks River (Bowling Alley), to south by railway line, to west by Lee Navigation and to north by A12	Lee Navigation	East Cross Centre off Waterden Road
Media & Press Centre and International Broadcasting Centre	Bounded to east by Waterworks River (Bowling Alley), to south by railway line, to west by Lee Navigation and to north by A12	Lee Navigation	Waterden Road
Hockey, service area and northern food hall	Bounded to east by Waterworks River (Bowling Alley), to south by railway line, to west by Lee Navigation and to north by A12	Lee Navigation	Waterden Road

Table 2: Olympics sites accessible from the tidal River Lea

Site No.	Olympic Sector	Description	Tidal Waterway	Current road access
1	Aquatic Centre	Bounded to North by railway line, to the south by railway line, to west by Waterworks River	Waterworks River	Warton Road off Carpenters Road
2	Service area northwest of Aquatic Centre	Bounded to East by railway line, to west by Waterworks River	Waterworks River	Carpenters Road
3	Athletes Village, Fencing Hall, BMX track, Velodrome, service areas	Bounded to east by railway line, to south by railway line, to west by Waterworks River, to north by A12	Waterworks River	Temple Mill Lane either via Ruckholt Road to north or Leyton Road to east
4	Paralympics tennis, Athletes area and service areas	Bounded to east by railway line, to south by A12, to west by Waterworks River, to north by Ruckholt Road	Waterworks River	Ruckholt Road
5	Coach drop, disabled and cycle parking	Bounded to east by New Spitalfields Market, to south by Ruckholt Road, to west and north by Waterworks River	Waterworks River	Ruckholt Road



**LBTH Energy Services Response to the Energy Statement for 2012
Olympic, Paralympic and Legacy Transformation Applications
Submitted by the Olympic Delivery Authority**

**ANCHORAGE HOUSE
2 Clove Crescent, London, E14 2BE.**

LBTH Energy Services Response to the Energy Statement for 2012
Olympic, Paralympic and Legacy Transformation Applications
Submitted by the Olympic Delivery Authority

Friday, 23rd February, 2007.

1) Response to the Executive Summary:

The report has been professionally prepared covering all aspects as much as possible but we have our expectations which we request to be taken into consideration.

The carbon mitigation for the buildings in the Olympic Park is set out according to the requirements of UK National and London Regional policy.

For an event like the London Olympics the carbon mitigation standard has to be a lot higher than stated in order to achieve a carbon neutral and zero carbon Olympics for the world to see and emulate.

The energy hierarchy for the Olympic Park as defined is good:

Mean: Energy Efficiency

Lean: Efficient Conversion (Fossil Natural Gas fired CHP and Biomass Boiler)

Green: Renewable Energy (various options to be phased in)

Our preferred Cooling, Heating and Electricity provision is by locally sourced sustainable wood chip-fired (Biomass) gasification/Pyrolysis CCHP System working in coordination with additional Biomass Boilers to meet the energy needs of the games park and legacy agenda. The integration of heat and coolth networks is very energy efficient.

Energy Efficiency in Buildings:

The targeted aspiration of 15% improvement on current Building Regulations needs to be higher. The Building Research Establishment (BRE) would have to take an Olympic Standard view of this.

SupaMag Technology (An Energy Services Renewable Energy Option):

Such new technology as the SupaMag which should be a matured and mass application heat and power provider well before the London Olympics should be given a slot to help London Olympics achieve a zero carbon Olympics.

SupaMag:

“Using two of nature's most powerful natural forces, the north and south magnetic fields within a proprietary and exclusive design, the motor will generate electricity and heat to power a home/building thus removing the home from reliance on the electrical grid systems and gas/heating oil currently used”.

The 'SuperMag' is the first of its kind in the world and merits an Olympic slot.

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The 'SuperMag' engine is designed to be scalable so that it can power any sized structure, or any number of structures.

It is also environmentally ideal with zero emissions.

Carbon Mitigation Strategy:

Fuel Cells Providers with their state of the arts systems of 2012 can be invited to have the privilege of supplying zero carbon energy on-site and they would pay for this privilege and of course because of the Olympic exposure. The selected few could be given slots to supply zero carbon power to the Olympic Smart networks controlled from the Energy Centre and this fact can be announced to the arenas as to who is supplying the zero carbon power and by what means.

With all this infusion of future proof technology, the carbon dioxide emissions reduction would be of Olympic standard consequently contributing to a carbon neutral and zero carbon Olympics.

Carbon Dioxide Emissions Reduction through Renewable Sources:

The proposed target of 20% from these sources is poor and can be improved by a factor of two. Since the Olympics would be during the summer months, the role of Photovoltaic technology should be raised as a deliverable on-site power option and of course manufacturers would do anything to have their systems in the Olympic infrastructure.

The key policy drivers for the carbon mitigation strategy are as follows are:

- Government policy on energy and the Kyoto Protocol.
- Government planning policy at national level.
- Regional (Mayoral) policy on Energy (London Plan and Mayor's Energy Strategy).
- Local Borough policies.
- Olympic special policies.

These key policy drivers are adequate enough if applied together with the additional strategies stated herein to deliver a carbon neutral and pure zero carbon Olympics with legacy wins.

2) Energy Efficiency...Mean Response:

Building Regulations:

The strict application of the 2006 revision to part L of the Building Regulation in coordination with BRE would also reduce emissions from the 2012 games park.

Energy Efficiency through Heat and Coolth Recovery:

In venues where there are potentially heat gains from the spectators, opportunities are created to recover this heat by heat-pumps and the recovered thermal energy is utilised to pre-heat the hot water used in the shower rooms etc. This would add to demand reduction of energy during the games.

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Rain Water harvesting:

There doesn't seem to be any mention of this concept to reduce the amount of water drawn from the mains. With vast amounts of roof space this feature is necessary.

3) Efficient Energy Supply.....Lean Response:

The Gas fired CCHP is good but would be exposing UK PLC yet again to the uncertainties of the Fossil-Natural-Gas world markets where price stability and security of supply is not guaranteed and can never be guaranteed. However locally sourced wood chip (Biomass) fired CCHP System would be an excellent choice as the technology has moved on as I will explain later on. This would provide cooling, heating and electricity on the cheap and is also an effective carbon mitigation measure. This would represent a solid legacy sustainable power provision. It would also be reliable.

The provision of the wood chips feedstock should be sourced from within London and the suburbs. We have in mind utilizing the vast supply of wood waste in the London area for the provision of the wood chips feedstock for the CCHP. The various parks in London can power the Olympics. LBTH has done a lot of research in this area. Waste wood in London has the potential to produce at least 70,000 tonnes a year of high quality woodchip fuel.

The establishment of Tree Stations in the Olympic Boroughs especially in the London Borough of Tower Hamlets would tap into this vast resource and during the Olympics, the woodchip feedstock would be provided free to the Energy Centre's CCHP and after the Olympics it would be paid for to make a business sense for the Tree Station operators. Our Borough can join Croydon in this enterprise and therefore would translate into a legacy win.

The Energy Centre should control other energy systems that feed power to the Olympic Park Smart Net work. Renewable Energy Providers would jump at the privilege to supply on-site green power to the Olympics; they stand to gain from the Olympic exposure. Wouldn't it be nice that when the power supply is on zero carbon during the Olympics, this information would be announced to the arenas? It would show to the World that London Olympics is a zero carbon Olympics with no carbon footprint! This objective is achievable at low cost by application of creative thinking.

As was stated in the ODA Energy Statement, "Systems based on gasification/Pyrolysis, thermal rankine cycle and indirect air intake cycle are

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considered as being at prototype scale within the UK. There has been a number of high profile failures of gasification systems in the UK recently” This is in reference to the wood chip fired CCHP I proposed above.

We beg to differ because if you step over to the continent, gasification/ Pyrolysis systems are successfully being operated in Austria and other European countries and we only have to ask them of this technological excellence which is affordable.

For a typical manufacturer of a working system Visit the following Website and also find attached a brochure in PDF:

<http://www.repotec.at>

With the above system, we can locally source the low cost feedstock that would sustain and raise the wood chip industry in this country. This is a win-win formula against yet more gas importation demand, this is a much better solution, economically viable and sustainable. It is also scalable and this technology can be faithfully relied upon.

The capital costs would be higher than the Fossil Natural Gas fired CCHP system, but this system would have highly reduced emissions, security of feedstock supply and availability of feedstock plus the attraction of ROCs. Even without ROCs it can stand on its merit.

Bio-Gas CHP

According to the Energy Statement: “The technology for on-site generation of bio-gas is currently not commercially viable or technologically proven.

The technology is commercially available and technologically proven. Examples can be found in Denmark, Sweden, Austria and Germany to name but a few. In USA the produced gas which is cleaned is termed “renewable natural gas” because of the high content of methane.

The Olympic Games could serve as an expo of other types of power systems; therefore the supply of power to the Olympic site should be multidimensional by incorporating other low to zero carbon options. I am sure power providers around the world would like to participate.

Community Heat and Coolth Networks:

The implementation of this will be another addition to the Olympic legacy.

4) Energy from renewable sources.....Green Response:

The methodology used to evaluate the application of renewable technologies for the Park infrastructure is very good.

Wind Turbines:

The selection of Utility scale wind turbine is appropriate but instead of one, two should be recommended and sited in an adjacent location.

Biomass Boiler:

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The selection of wood feedstock fuelled Biomass Boiler is appropriate.

Biomass combined cooling, heating and power Systems:

The European established electrical efficiency is 25% and not 15% and this was stated earlier. Our research shows that the woodlands around London which includes the Royal Parks, Epping Forest, Hampstead Heath et al can guarantee the provision of feedstock and is sustainable. In addition there are many wood chip and wood pellet producers across the country that would like this industry to really take off instead of enslaving the country to yet more gas imports. The favourable economic impact of Olympic coolth, heat and power supplied from Biomass CCHP is far superior to whatever Gas fired CHP can offer to the games and legacy agenda. The combination of Biomass CCHP and additional Biomass Boilers would shrink the carbon footprint of these games to the point of where it could be classified as the greenest games of all time. With the right financial model, the implementation of the above would be a child's play.

Any system installed in mainland Europe can be interpreted as installed in the UK as well because we part of the EU.

5) The Grand Conclusion:

The Olympic, Paralympic and Legacy Transformation potential impact has created a golden opportunity for decentralised energy, renewable energy, carbon neutral and zero carbon strategies to be implemented in the London Energy Supply landscape. This opportunity can not be missed.

Biomass (wood chip) fired Combined Cooling, Heating and Power generation systems sited across the Olympic Boroughs would be a solid legacy that would shrink the carbon footprint of the Olympic Boroughs. The economic impact is also a big gain. The resulting low priced heat, coolth and power would go a long way to diminish fuel poverty in the Olympic Boroughs.

Whilst the ODA appear to be content with the potential reduction of circa 34% carbon emissions from the predicted baseline, the evidence is that a target of carbon neutral or pure zero carbon powered games (strictly non-nuclear) is easily achievable with a mix of commercially available and proven technologies and the right financial models. I rest my case!

Appendix K

Assessment of Olympic Park Application

Transportation and Highways Comments

February 2007

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Olympic and Legacy Travel Plan Group

Travel Plan Co-ordination

Volume 13a Section 1.3.16 identifies the need for committed and co-ordination and management of the Travel Plan to deliver site-wide and programme delivery-wide success. It is proposed that an Olympic Park Travel Plan Group is set up to deliver this across all phases of the delivery programmes from construction to occupation of the Legacy land uses.

The role of the group will be to:

- *Coordinate the Construction Phase transport and review transport effects through on-going development and implementation of the Code of Construction Practice and the Traffic Management Plan.*
- *Refine and implement the Olympic Transport Plan to deliver reliable, inclusive and sustainable transport for spectators and visitors*
- *Co-ordinate the construction traffic impacts during Legacy Transformation*
- *Co-ordinate the development, implementation and enforcement of Travel Plans for the Legacy land uses.*

The establishment of a Travel Plan Group is welcomed and will help to deliver a consistent, well managed, monitored and enforceable Travel Plan. Due the specific nature of the development and the impacts of the Travel Plan on the Highway network, bus routing, pedestrian and cycling facilities; along with the co-ordination of this travel plan along with future development proposals; it will be necessary for this responsibility to sit within the Transportation and Highway's section.

To facilitate the intense investment in time and detail this role will be required to deliver; the ODA should be conditioned to provide a contribution towards revenue support for officer time, from 2007 to at least 2014, with a review period in 2014 to identify contributions going forward to 2021, when management companies for venues and new residential and commercial land-uses will be required to manage and monitor their individual travel plans.

Highway Mitigation Measures

Management of Highway Mitigation Measures

In the TA (Volume 13a section 1.3.18 and section 10.4) reference is made to setting up a framework for identifying and taking forward mitigation measures for transport schemes that have been identified as necessary as a result of all Olympic Legacy and development associated with it, as well as contributions from developments within the wider Lower Lea Valley area. This would be known as OPTEMS – Olympic Park Transport and Environmental Management Schemes.

OPTEMS would be set up jointly with Boroughs, TfL and UDC. This would give Boroughs and TfL comfort that structures are in place for identifying, costing and taking forward schemes which are in line with policy – in advance of the detailed information being available.

These would include, initially, an Agreement between the ODA, TfL, LDA, UDC and the Boroughs and provide for constitution of a Lower Lea Valley Transport Investment Group with delegates from the each of the above bodies.

The setting up of OPTEMS and The Lower Lea Valley Transport Investment Group is welcomed and will provide a unique and effective way to control and implement highways mitigation measures. However there is a concern over staffing availability for this function.

The officer responsible for attending will come from Transportation and Highways – Development section, as they are best placed to liaise with Development Control over applications, as well as secure contributions from developers, along with liaising with Highways Design, Highways Asset Management and Capital Programmes and the Local Implementation funding team.

For this role to be fulfilled revenue funding must be supplied primarily by the ODA, supported by other developments in the Lower Lea Valley as they progress through planning. A Contribution to fund this role should be made available by the ODA from 2007 through to 2014 for this role as a condition of planning; with a commitment to continue funding to 2021 following a review.

OPTEMS needs to function with TfL's LIP programme, particularly where bids for next years work are already being drawn up. TfL's involvement in OPTEMS is vital. Also understanding that transport programmes, particularly signalling have long delivery times; it essential that these factors are taken into account in the delivery of programmes.

OPTEMS and the Lower Lea Valley Transport Investment Group needs to be set up as soon as possible, preferably prior to construction work begins. This should be a condition of the application.

Revenue Support

In light of the responsibilities we will have to the delivery of the Olympic Park, Games operation and Legacy, from both OPTEMS, Travel Plan Management, Network Assurance and Project Management, Tower Hamlets will need to ensure that they have the adequate resources necessary to deliver these key responsibilities in time.

Tower Hamlets is the borough that will deliver most of the traffic from Central London to the Games site. This includes the spectators, workforce (construction and Games), and the Olympic Route Network. This will require intensive levels of man power.

The ODA will need to supply revenue support to Tower Hamlets, Transportation and Highways section. This has been assessed as 3 FTE at PO2/4 staff members. These should be in place as soon as possible, preferably by July 2007, to enact the programme of works necessary.

The Existing Situation 2006

Modelling

Halcrows have been acting on behalf of all the boroughs in providing technical comments on the model. Hence they have really carried out the independent verification. Although we have had some concerns about the variation between counts and modeled traffic and public transport flows (in some cases buses were underrepresented by 90%) the resultant conclusions from the highway modeling are as we would have anticipated and reflect the impacts we identified two years ago for treatment through our LIP programme.

Existing Highway Network

The application (Volume 13a – section 4.7.7) identifies that there are a number of priority road routes that are of importance to the application, which fall within Tower Hamlets, these are:

- *East Cross Route – A12M*
- *Blackwall Tunnel Northern Approach – A12*
- *A11 – Mile End/Whitechapel Road*
- *A13 East India Dock Road*

These roads are part of the Transport for London Road Network (TLRN) and are priority red routes or urban motorways, as identified in the UDP. In addition priority routes adjacent to the borough must also be considered in respect of this application and how they will affect Tower Hamlets; namely:

- *A11 High Street Stratford*
- *A13 Newham Way*

In addition it will also be necessary to consider other A roads and distributor roads and how they will be affected; in particular with local and Olympic traffic displacement, these roads include;

- *Limehouse Link*
- *The Highway*
- *Burdett Road/Grove Road*
- *Roman Road/Old Ford Road*

Journey time surveys (13a - 4.7.22), undertaken in May 2006, indicate sections of the road network are congested. Routes were experience average speeds 9kph and 27kph, with the PM peak suffering the worst with average speeds of less than 12hph on 67% of the routes and less than 14kph on 83% of the routes.

These figures highlight concerns over construction effects on the road network and also disruption that may be caused by the transfer of passengers by bus and the distribution of the Olympic Family during the Games operations.

Roads that are planned to be closed during construction and the Games also are of concern, as these show significant traffic numbers (13a – 4.7.21):

- 600vph southbound AM peak, 450vph northbound PM peak on Waterden Road
- 750vph westbound AM peak. 700vph eastbound PM peak on Carpenters Road

Much of this traffic will be displaced onto the existing road network when the closures come in to place; exacerbating the congestion on these roads. This will impact on construction and Games traffic. Further studies, (13a - 4.7.25) using number plate recognition, have shown that 50% of the traffic using Carpenter's Road and White Post Lane is terminating within the Olympic Park site. There will be no access to the park and business will be relocated, this should have the effect of reducing the impact of the road closures on the remaining network.

Existing Junctions

In the Tower Hamlets locality there is one junction that has been identified as being at capacity or over in the AM peak – at a saturation point exceeding 100% (13a – 4.7.28):

- *Roman Road/Cambridge Heath Road/Bethnal Green Road*

With the following junction approaching capacity:

- *A13 East India Dock Road/ A12 Blackwall Tunnel Northern approach.*

The Roman Road/Cambridge Heath/Bethnal Green Road junction has been identified as being over capacity in the PM peak as well as on Saturdays.

Whilst neither of these junctions are identified as routes for construction; the A12/A13 junction may form part of the Olympic Route Network. All junctions however may suffer further problems due to increased traffic on the main distributor roads, which may encourage more local traffic to use these routes. In addition plans for the cycle parking to be located in Victoria Park during the Games will necessitate that the Bethnal Green, Roman Road junction will need measures to accommodate an increase in cycle traffic.

It must be noted that the junction with the A12 and A11 were identified as being at over capacity. This is consistent with other evidence and shows that the Bow Flyover is operating efficiently; however increases in construction and Games traffic will have a major impact on these junctions and will need to be closely examined.

The Roman Road/Cambridge Heath junction is f major concern; this junction operates as a throttle, controlling traffic flows on the wider network. Increased traffic would have significant effects not just locally but network wide. This junction needs to be seriously considered and approaches to it, from Olympic related traffic needs to be managed.

Accident Statistics

Current accident statistics have been included in the application and show that the majority of accidents on the main A routes were rear end shunts, lane change discipline or failure to give way with no major highway design cause (13a – 4.11). However there are concerns over accidents in the Mile End and Old Ford area where there were significant clusters of accidents around the Underground Stations. More

local traffic on these routes could increase accidents here and measures around these interchanges may need to be implemented.

Existing Rail Network

The area of the Olympic Park is served by a combination of rail services; these services have high frequencies and are detailed below (13a – 4.2.1)

- *One services through Stratford – AM peak 25 trains per hour (tph) – PM peak 23 tph.*
- *Lea Valley Line through Stratford – 1-2 tph*
- *North London Line - 4-6 tph*
- *C2C services – 2tph*
- *Central Line – AM/PM peaks 30 tph*
- *Jubilee line – AM/PM peaks 24 tph*
- *DLR – AM/PM peaks 7-9 tph*

West Ham Station

- *C2C services – AM/PM peak 12 tph*
- *Silverlink – 2tph*
- *District Line – AM/PM peak 20 tph*
- *Hammersmith and City – AM/PM peaks 20 tph*
- *Jubilee Line – AM/PM peaks 24tph*

All exiting loadings on the rail, underground and DLR for the morning 7:00 – 10:00 AM peak appear to be operating within their capacity. During the 08:00-09:00 peak hour both the Central line and Great Eastern line are operating near or above capacity (13a – 4.2.12)

Stations currently operational that are directly affected by the Olympic Application:

- *Stratford Regional*
- *West Ham*
- *Leyton*
- *Hackney Wick*
- *Pudding Mill Lane*

These stations will be directly affected by the application, however the following stations should also have been considered in the existing picture of rail services. Bromley by Bow, Bow Church and Bow Road, all of these stations are within easy walking distance of the application boundary. In addition Mile End Station should have been included for future comparison.

Existing Bus Services

The Park area is well served by a number of buses, however the western side is less well served than the others; bus networks currently serving the Tower Hamlets area are (13a – 4.4.5 table 4.5):

- *25 – Peak flow 12 buses per hour (bph), off peak 12, evenings 7.5*
- *108 – Peak 6, off peak 6, evenings 7.5 bph*
- *D8 – Peak 5, off peak 4, evenings 3 bph,*

- S2 – Peak 7 , off peak 7 , evenings 4 bph
- 276 – Peak 6, off peak 5, evenings 3 bph

The passenger loads for these routes are as follows (13a – 4.4.7 table 4.6):

Service	Capacity/Passenger loads Mon – Fri (Passengers per Hour)			
	AM Peak	Off peak	PM Peak	Evenings
25	1,788/918	1,788/848	1,788/1,054	1,118/ n/a
108	360/177	360/116	360/205	180/ n/a
D8	250/118	200/88	250/122	118/ n/a
S2	385/166	385/193	385/168	220/ n/a
276	360/262	300/205	360/301	180/ n/a

Evening loading not available

Existing Coach Services

There are 37 return coach journeys per hour that stop at Stratford that pass through Tower Hamlets, and an additional 96 journeys per 2 hours that service Stanstead Airport terminating or originating from the City that stop at Stratford (13a – 4.5.1 table 4.8) Although it should be noted that none of these services stop in Tower Hamlets.

Existing Walk and Cycle

Walk routes

There are two walking routes near the Olympic Park that are designated as part of the London Strategic Walk Network (13a – 4.8.1):

- Capital Ring – coincides with the Greenway and Lea Navigation Towpath
- Lea Valley Pathway – coincides with the National Cycle Network (NCN) route 1 north of Carpenters Road.

In general the routes are poor quality due to heavily traffic roads, limited crossings and the number of waterways and railways that cross the routes. In addition there are perceived, as well as actual, personal security risks which discourage walking trips in the area (13a – 4.8.3)

Cycle Routes

There are almost no designated cycle routes crossing the Park. The main routes are (13a - 4.8.4):

- The Greenway
- A12 – Temple Mill Lane
- Carpenters Road

Gaps and constraints in the Existing Networks

There is no cycling on the A12 and is grade separated, therefore all crossings need to be provided on bridges or through underpasses. There are a number of crossings, but the underpass crossings at Wick Lane, Bow Interchange and Waterden Road present hostile environments and deterrents to walking and cycling (13a – 4.8.6)

Cycling on the A11 is permitted, but there are barriers. There is a lack of existing crossings, the severance of the Greenway and the Lea Navigation towpath, discontinuity of bus lanes and disallowing cyclists on wide footpaths (13a 4.8.7).

Usage data

Carpenters Road whilst having no dedicated facilities is well used by cyclists, due to its strategic east-west connections (13a – 4.8.14).

Mile End Road has a high cycle usage (up to 1,000 cycle movements per day) providing a fast, direct route to central London and providing wide bus lanes. Traffic free routes on the NCN Route 1 carry higher daily cycle flows than the surrounding road network (13a – 4.8.5)

Site Enabling and Construction

There are a number of elements to examining the effects of the construction of the site and its impact on transport, these are:

- The enabling works - road closures
- Construction Traffic
- Code of Construction Practice (CoCP)
- Workforce Travel

In addition the examination will consider the different modes of transport

- Public Transport – Rail, Underground/DLR and Buses
- Walking
- Cycling
- Roads and Highways
- Other modes – Water/Air

Site Enabling

To ensure that the Olympic Park is delivered on time and to ensure that security is kept at a consistently high level, the entire site will be sealed by a perimeter fence and access strictly controlled. This results in a number of roads being closed to all traffic. These closures will be in effect from July 2007. The road closures will be:

- Warton Road
- Quartermile Lane
- Marshgate Lane
- Carpenters Road
- Waterden Road
- White Post Lane
- Pudding Mill lane

The closure of White Post Lane leading into Carpenters Road across the Tower Hamlets Boundary will have the most direct effect on transport in this borough.

Highways

Highway Impacts

All assessments and modelling figures calculated for the construction phase of the site include the road closures detailed above. In addition the closure of the site to the public also means the relocation of businesses and commercial operations within the boundary. This equates to some 4,936 jobs (13a – 5.9.2).

Origin destination surveys undertaken in 2006 show that 2,500 vehicles enter and leave the site boundary during the AM and PM peaks; of these approximately 50% were through trips. Therefore around 1,250 vehicles will be diverted onto to the highway network as a result of the closure. The remainder will be lost due to the relocation of commercial activities to another site.

The effect of the 1,250 vehicles using other road networks has been modelled (13a 5.9.5) and the results show increases/decreases in the following:

- Leyton High Road +4%
- Angel Lane -14%
- A11 Stratford High Street +17%
- A12 East Cross Route +6%
- The Eastway + 55%
- Ruckholt Road -20%

These figures indicate that the main impact of the road closures will be on The Eastway. However it is felt that whilst the modelling is robust there will be more impacts experienced on the East Cross Route and Bow Interchange due to increases in construction traffic to the North of the site and east of routing the East Cross Route and High Street Stratford offers.

The site closures will affect junctions around the site, some junctions already experience congestion. Junction modelling has identified some junctions that will experience an increase of over 2% above 85% current saturation (12c 8.5.28); these are:

- Bow Interchange
- Junctions associated with Wick Road/ East Cross Route intersection
- High Road Leyton/Grove Green Road
- Tredegar Road/St Stephens Road

Whilst it is considered that the road traffic impact on Bow Interchange will not exacerbate the junction operation from a vehicular point of view, there is concern that the impacts on the bus interchange and the pedestrian crossing at this junction may be negative. Consideration must be given to bus, pedestrian and cycling activities at this point. This should take the form of signal priorities, more legible and desirable crossing facilities and signal timing changes.

The Wick Lane/Tredegar Road/East Cross Route Interchange may also suffer from congestion as traffic attempting to enter or exit the East Cross Route from either direction may encounter more delays. Continuous monitoring of queuing on the slip roads should be considered throughout the construction period. Should any increases in delays and queuing be experience here, mitigation measures must be considered and implemented.

In addition monitoring of Tredegar Road should be considered as a potential route to avoid Bow Interchange. If queuing of traffic at the Bow Interchange occurs, traffic may use Tredegar Road/Fairfield Road area as an alternative route to avoid the Bow Interchange. Should this occur, mitigation measures along Tredegar Road should be implemented to slow traffic and discourage this potential 'rat run.'

Construction Traffic

Much of the modelling for the construction traffic impacts is considered in the modelling for the road closures. However there is an important concern over the plans submitted in this application. It has been impossible for full assessment of the impacts of construction traffic, mainly deliveries and removals from site, due to no detail of where the construction vehicle entry and exit points will be, with exception of comments stating:

“...with HGVs mainly routed along the M11 and A12. Most vehicles will access the construction site from the Lea Interchange. Whilst there will be additional access points to the south and southwest of the Olympic Park, these are secondary in importance.” (13c – 5.5.2)

There is no location detailed, and comments such as construction traffic will arrive and leave via the North are insufficient to assess the impact fully. It is important, from an impact on residents and business point of view, to establish the proposed routes. The access points to the south could impact in the A12 Blackwall Tunnel Northern Approach, A13 East India Dock Road and the Blackwall Tunnel itself. Even as secondary routes, these access points could generate a negative impact on traffic in the area, as well as create problems for local residents.

A number of measures detailed in the Code of Construction Practice are welcomed and discussed later, but without details of the exact entry and exit points it is impossible to assess the impacts on local roads. Such ameliorative matters are secondary to the entry and exit points.

Routing is the single most important factor in considering the impacts of construction traffic and the omission of detail from the Transport Assessment is extremely disappointing.

It is noted that the number of vehicles anticipated daily will be 275 vehicles per day per direction, totalling 550 trips (13a – 5.5.2) this is a significant number and the true effects will need to be fully examined once construction routes are finalised.

A condition needs to be placed on the ODA to provide this information in advance of work starting and in consultation with the Highway Authority. This is of public concern and will need to be viewed and agreed in public.

Workforce Travel

It is anticipated that 10% of construction workers will arrive by car this equates to 225 vehicles entering and leaving the site a day (13c – 5.5.4). This shows a significant number will be travelling by public transport. This is acceptable from a highways and sustainability perspective.

However it should be noted that detailed monitoring and enforcement should be undertaken through the Olympic Park Travel Plan Group. 10% should be the absolute maximum and should be limited at that point. Again details of workforce access points will need to be submitted along with parking locations.

The locations of construction worker access points need to be detailed. Any non vehicular access points to the East, North East and South East corners of the site could encourage parking outside of the site. A particular concern is Fish Island, where no controlled parking zones exist at present.

Residents and businesses will need to be protected from construction parking and a CPZ should be a mitigation measure that is enacted as a priority.

A shuttle bus is mentioned in the application (13a – 5.5.4) that will operate from off-site railway stations to accredited entry points. The entry points need to be identified, as do the rail stations.

Highways Measures Envisaged

Vol13a – 5.10 details a number of potential measures that could be enacted to mitigate the level of impact created by the road closures and construction workforce. These include:

- *Signal timing optimisation at perimeter junctions*
- *Kerb and carriageway widening at perimeter junctions*
- *Improvement and replacement of signage, road markings, and street and junction lighting*
- *Restriction of movements at junctions as part of managing the proposed diversionary/alternative routes which may be required to assign traffic from congested junctions. This may be required at the junctions of B142 Tredegar Road/ A12 East Cross Route/ A12 Blackwall Tunnel Northern Approach and Cadogan Terrace/ A106 Wick Lane*
- *Construction management/ control of perimeter junctions to include*
 - *A12 Bow Interchange*
- *Local access schemes could be developed by the Contractor*
- *Off site junction management/Control*
 - *Tredegar Road/St Stephens Road*
 - *Devas Street/ A12 Blackwall Tunnel Northern approach*
 - *St Pauls Way/ Burdett Road*
 - *Cambridge Heath Road/ Old Ford road*
- *Enforcement of parking restrictions along routes to and from the Olympic Park to aid the movement of pedestrians, cyclists, public transport, construction workers and vehicles; to include*
 - *A106 Ruckholt Road*
 - *Leyton Road and High Road*
 - *Stratford High Street*
- *Introduce management and enforcement of parking within residential areas; to include:*
 - *Bow*
 - *Old Ford*
 - *Bromley by Bow*

It is felt that these are acceptable solutions, although they lack detail. This is of greater concern as construction will commence in the later part of this year and measures will need to be consulted and implemented very quickly.

It is possible that OPTEMS will deliver these in detail, however the OPTEMS system has yet to be set up and the Lower Lea Valley Transport Investment Group is not operational and only an idea in this application. It is a matter of priority that these groups be established and start work on the mitigation measures in time for the start of construction.

It is in the interests of the ODA to have established a significant level of detail concerning mitigation measures surrounding construction to assure and comfort local residents.

It is of vital importance that monitoring, enforcement and effect control is established to protect local residents and businesses from adverse impacts. Aspirations to inform residents, focus groups and information telephone hotlines and reporting lines are important but measures need to be detailed on what will happen to complaints and

what penalties will be applied to construction offenders. Similarly the measures need to be identified to prevent continued re-offending.

The Bow/Tredegar Road area has significant traffic claming measures in place currently. These appear not to have been taken into consideration. The current measures need an area wide review and new and replacement measures need to be implemented to ensure that the area is more efficiently managed and prepared for Olympic traffic impacts.

Permanent signalling of the A12/Wick Lane junction should be seen as a priority and will act as a control opportunity. This is welcomed.

The Olympic Travel Plan Group should monitor the effects of construction traffic and its impact on the highway network and inform OPTEMS of the need of mitigation measures which should then be carried out.

Public Transport

Bus Routes affected by closures

Service 276 – The closure of Carpenters Road will require amendment of the 276 bus route; the diversionary route will be in place throughout construction and the Games phase. The route agreed with London Buses is around the southern and western perimeter, via Stratford High Street, Bow Interchange, A12 East Cross Route, Wick Lane and Wansbeck Road. This diversionary route has been agreed by Newham, Hackney and Tower Hamlets and incurs an additional 2.2km and between 7-8 minutes additional journey (13a – 5.6.5).

This route whilst acceptable would be preferable if it was to include areas of Tower Hamlets currently lacking in adequate provision, it is not accurate to say that the diversion route has been agreed by Tower Hamlets. There is also concern over London Bus's potential plan covering changes to the S2 and new 425 routes, which appear to contradict plans agreed by Tower Hamlets and the ODA.

There is potential for further bus priority in the area and discussions regarding bus priority are on-going (13a – 5.6.11). These discussions need to be increased and action taken as a priority to deliver significant mitigation measures.

The relocation of East London Bus and Coach Company's 'Stratford' and 'Waterden Road' bus garages and First Capital East's 'Hackney' garage to a site in Wyke Road on Fish Island are currently pending application. Should this proposal be enacted bus routing needs significant discussion to ensure that Tower Hamlets realises significant bus route improvements for local residents and businesses.

Public Transport Effects

A significant number of workers are expected to arrive to the site by public transport, most arriving at Stratford Regional Station by rail services. It has been anticipated that 85% of the workforce will arrive by public transport (13a – 5.7.3)

It is anticipated that some 4,936 industrial jobs will be lost due to the relocation of businesses in the site; these will be replaced with 2,250 Olympic workers, rising to 5,000 in 2010. Therefore the impact on public transport would not be considered significant in terms of passenger increases and crowding (13a - 5.7.4).

Public Transport Measures Envisaged

Bus

The re-routing of buses will ensure the services are still running and bus priority measures will be discussed (13a - 5.8.2).

There needs to be discussion and agreement between the ODA, Boroughs and London Buses to enact these measures immediately. In addition real agreement needs to be made between all parties on the exact nature of route changes on the 276, S2 and 425 routes before implementation occurs.

Rail

The management of the effects of construction workers on rail services will be undertaken through implementation of the Travel Plan prepared by the contractors (13a – 5.8.3).

Severe concern is raised over the effectiveness of handing the Travel Plan responsibility to contractors when the ODA travel plan is so weak and appears to be lacking in any real guidance, enforcement or monitoring criteria.

Walking and Cycling

Planned closures

The closure of Carpenters Road will result in no cycle or walking access on east-west routes across the Park (13a – 5.11.1). The closure of Temple Mill Lane and part of the cycle path adjacent to the A12 will reduce northern access routes (13a – 5.11.2). Mitigation measures were assessed and preferred alternative routes were identified and agreed with the ODA in consultation with the stakeholders (13a – 5.11.3).

Walking and Cycling Measures Envisaged

Carpenters Road Closure – The use of the Greenway and then the Lea Navigation towpath will be implemented. This is the shortest route that minimises disruption and inconvenience (13a – 5.12.1)

Improvements to the Greenway and Lea Navigation towpath by July 2007 to include:

- *Vegetation removal to improve width and sightlines*
- *Railing and barrier removal to provide a continuous route*
- *Surface treatments and drainage to improve user comfort*
- *Lighting and treatment of vertical surfaces to create a safe, attractive environment*
- *Produce and disseminate new promotional route map/information*
- *Additional security measures such as CCTV and regular patrols*

(13a – 5.12.3)

These improvements are welcomed but the following measures need to be included to ensure that the best facilities are provided: the improvements to width and sightlines should be of a high standard and accommodate maximum demand for cycle and pedestrian flows anticipated. The improvements to surface treatments should be made to the London Cycle Design Standards. Approaches and treatments

to the Greenway should accommodate mobility impaired users. Measures will need to be designed and implemented to prevent the use of these routes by motorcycles.

It is possible that sections of both the Greenway and Lea Navigation towpath will be closed for periods during construction; requiring mitigation measures and signage. An alternative route would be along Stratford High Street and the River Lea Navigation towpath (13a – 5.12.5).

Concern is raised for inexperienced cyclists using the busy A11 as an alternative route, a dedicated cycle lane should be provided, the use of the Rover Lea Navigation towpath would be idea; but it must be to a standard to accommodate shared pedestrian and cyclist traffic.

Improvements to the A11 will be welcomed but particular focus must be made on the Bow Interchange which will be a critical crossing point coming off the River Lea and significant measures must be implemented to ensure safe, direct and fast crossing at this point.

Improved security measures will include:

- Permanent lighting
- CCTV and patrols on the corridors
- Random policing by the Metropolitan bicycle team
- Positive promotion and publicity to encourage usage and reduce the feeling of isolation

These measures are welcomed; a regular log of patrols and monitoring of patrols needs to be kept by the ODA for the duration of the construction, Games and transformation phases.

London 2012 Olympic Games and Paralympic Games

It is the ambition of the ODA to host a 'public transport Games' (13c - 6.2.3). Car parking will not be provided for ticketed spectators, with the exception of disabled people. Strict parking controls will be implemented around the Park during the Games to support the strategy to minimise car use. Visitors will be expected to access the Olympic Park through:

- *Public Transport*
- *Cycling*
- *Walking*
- *Park and ride services*
- *Coaches*

Highways

The Olympic Route Network (ORN)

This has been identified in the Olympic Transport Plan First Draft, which was open to consultation in the early part of 2007. The anticipated route will be along the Highway and then following the A12 Blackwall Tunnel Northern Approach.

A variety of temporary traffic management measures will be implemented along the ORN to ensure a reliable journey for Olympic Family vehicles (13a – 6.2.8). The ODA will have a range of temporary powers to manage traffic along the ORN to ensure the smooth operation of the road network during the Games.

It is essential that along with TfL, Tower Hamlets is consulted and included in the development of any traffic management measures implemented. With the effects of temporary traffic measures along East India Dock Road and The Highway impacting on local traffic, combined with increases in bus traffic and activities, such as the marathon, along Mile End Road/Whitechapel Road; could impact heavily on local residents and businesses. All measures need to be co-ordinated with Tower Hamlets as the Highway Authority.

In addition, any temporary measures to control traffic will need to be assessed and considered as to their effectiveness. It should also be considered as to whether the temporary measures would be better put in place earlier than 2012 and be permanent; creating a lasting legacy to local communities.

The Olympic Family will access the site through an accreditation area adjacent to the A12, accessed from Wick Lane, at the junction with the East Cross Route. As this is the main entry and exit point on the ORN a significant amount of traffic will be utilising this junction and will have priority over other traffic.

Diversions tactics and notices will need to be in place to reduce traffic flows from the Bow and Old Ford area to this Junction.

The International Broadcast Centre and Main Press Centre (IBC/MPC)

This is situated on the Northwest corner of the Park; it is the centre of all media activities. Access to the IBC/MPC is from the A12 Eastway (13c – 6.6.25). The media forms 20,800 people and are part of the Olympic Family and are at present allocated 1,100 cars as transport (13c – 6.2.34/6). The IBC/MPC will have facilities for 30

coaches to pick up and drop-off; in addition there will be 1,300 car parking spaces in a multi-storey car park, which will be retained in legacy (13c - 6.6.25).

As the Media will have access to the ORN, they will be impacting on to roads that traverse Tower Hamlets. In particular the Bow Interchange. It is essential that effective management of this route and the junction is considered in conjunction with local needs and the needs of the bus network that will continue to serve local residents during Games events.

It is a concern that with the increases in the bus patronage by event visitors, particularly the Number 25 and those routes that interchange under the Bow Flyover, delays as a result of the ORN and associated transport, local residents will be unable to access the bus network at the intermediate stops. This coupled with crowding on the underground network, especially the Central Line and DLR routes; and local traffic measures preventing car access; could mean that residents in Bow and between Mile End Road and East India Dock Road could find themselves isolated from essential services and amenities.

Highway Effects

Forecast models has predicted a general decrease in background traffic as a result of reductions due to natural August/Summer holiday downturns, reduced traffic due to Olympic Games reducing the attractiveness of travelling by vehicle in the area (13a - 6.11.2). Forecasts show the following (13a – 6.11.4):

- *Leyton High Road +2%*
- *Angel Lane +110%*
- *Stratford High Street +70%*
- *East Cross Route -9%*
- *Ruckholt Road -26%*

Junctions

During 2012 there will be a number of junctions that will exhibit increased capacity above 85%; these are (13a – 6.11.6):

- *Bow Interchange*
- *Stratford Gyratory*
- *Hackney Wick*
- *Along the ORN and North of the Blackwall Tunnel*
- *Junctions in Bethnal Green and Mile End area caused by traffic displaced by the ORN*

It is anticipated that during the Games junctions that provide direct access to the Park will be managed by a range of measures to include (13a – 6.11.8):

- *Manned junctions*
- *Temporary traffic signals*
- *Changes to existing signal timings*
- *Modifications to Public Transport access to the park and benefit pedestrian/cycle movements*

Specific measures to Junctions in Tower Hamlets

A12 Bow Interchange – AM peak increases to 86% capacity, PM peak increases to 91% capacity, will require optimised signal timings to ensure that this junction operates satisfactorily as apart of the ORN (13a - 6.11.17).

Whilst the ORN traffic is given priority, necessary consideration of the bus interchange under the Bow flyover must be taken into account to preserve local accessibility to the bus network.

B142 Tredegar Road/A12 East Cross Route – This junction will provide access to the Olympic Family accreditation area. AM flows show an increase, but below 85% saturation, but could result in queues, PM peaks show increases to 111%. Signal controls will have to be implemented for the duration of the games. (13a – 6.11.18)

It should be investigated as to whether permanent signals should be installed to facilitate safer pedestrian and cycle crossing and to regulate flow in legacy. This junction could also suffer from increased flows following legacy transformation and residential and commercial occupation of legacy land uses.

Highway Measures Envisaged

The application states that measures will be developed following responses on the first draft of the Olympic Transport Plan (13a - 6.12.1). Whilst this is understandable, more details could have been presented at this stage based on traffic modelling and known facts. These measures will need to be planned into the existing highway maintenance programmes so as to avoid and minimise further disruption; in addition work that should mitigate the construction phase may also be helpful for Games period. Completing the work at the same time would again minimise disruption. Therefore, it is essential to have full details as early as possible. OPTEMS should see this as a priority.

General transport management measures envisaged are:

- *Appropriate signage for pedestrians and cyclists to use alternative/diverted routes*
- *Appropriate highway and kerbside signage for diverted bus routes and temporary bus stops as well as notification to all users*
- *Improved lighting and security measures in order to increase usage of routes by pedestrians, cyclist and workforce*
- *Improved streetscaping, surface treatments and landscaping on routes and diversionary routes to communicate to vehicle users to respect the existing community they are passing through*
- *Monitoring and maintenance of road/line markings, lighting, signage, and general street cleaning and sweeping*
- *Improved streetscaping, surface treatments and landscaping or disabled people.*

(13a – 6.12.2)

The Olympic Transport plan sets out the overall games management proposals including the ORN, Olympic Lanes and management of all Games movements (13a – 6.12.3) this document was deficient in man areas covering the management of transport and was mainly aspirational with few details to examine. It is felt that this application does little to fill in the gaps that exist in the OTP.

Highway measures during the games will include management and maintenance of access to side roads where possible, particularly managing the movement of non-local traffic. Measures could include:

- *Signal timing optimisation at perimeter junctions*
- *Management of junctions vital to the operations, such as the transport malls, accreditation areas and at grade crossings to prevent disruption and delay to the traffic*
- *Selected access to areas for residents and businesses only*
(13a – 6.12.4)

New or improved signalling of junctions at Bow Interchange and Tredegar Road/East Cross Route/Blackwall Tunnel Northern Approach (13a – 6.12.5)

Redirection of general traffic away from specific junctions in the vicinity of the Park to ensure efficient operation and movement of pedestrians, cyclists, public transport and games vehicles.

Management of Black Taxi traffic, providing a rank suitable for need at Stratford Regional Station, as well as providing access to taxi's carrying disabled passengers at the transport malls (13a – 6.12.7).

It is felt that taxi traffic scheduled for the rank should have a specific route to the drop off zone that avoids the A11 Mile End to Stratford route to prevent the event visitors hailing taxis along this important transport corridor, which could block bus lanes, and cause a public safety issue.

Public cars will be dissuaded from pick up and drop off around the site (13a – 16.12.8), this will need to be enforced and managed. The area of enforcement and control will need to extend for a considerable distance around the park, taking into account large areas around Bow.

Traffic claming in neighbouring areas will be considered to manage undesirable diversion of traffic into commercial or residential communities. This will be required in a number of areas including Bow, Victoria Park (13a – 6.12.9). This will be essential and necessary in Bow and the area between the A11 and the A13. The ORN in combination with the high traffic demands along the A11 will put pressure on this area and could result in accidents and negative impacts on the community.

The management, monitoring and control of off-site junctions (13a – 6.12.10/11). These are unspecified but a detailed plan needs to be included and needs to take into account other Games time operations, such as cultural events at Victoria Park, events at the Excel centre and at Greenwich.

Enforcement of parking and loading restrictions along routes to and from the Olympic Park (13a – 6.12.12), to include:

- *Bow*
- *ORN route*
- *Mile End Road*
- *Bow Road*

Enforcements and extensions to current CPZs in areas such as Bow (13a – 6.12.16), this needs to be extended to include Fish Island, areas around Bethnal Green (the predicted main cycle route), areas north of Poplar and around Bromley by Bow.

Coach Transport

The Olympic Transport Plan sets out an 8% arrival and departure by direct coach services, these services will terminate in dedicated coach facilities at the transport malls (13a – 6.17.1). In addition a further 10% of spectators are expected to use coach based park and ride services. These will shuttle between the Park and locations in the south-east of England. 8.1% of the Olympic workforce are also expected to use park and ride services (13a – 6.17.2).

Parking for direct service coaches – those who are chartered specifically for the Games or part of package tours, and park and ride coaches will have dedicated coach parking within the transport malls and off the public highway. This is welcomed.

Scheduled coach services will also operate, these will have defined drop off and pick up points outside the park entrances, which have yet to be defined. It is of concern that these stops will interrupt the flow of the highways and cause narrowing of pavements where passengers wait to alight.

The timing of pick ups and drop offs will have to be closely managed. It is highly likely that the times for pickups and drop offs will be similar and could cause queuing on the public highway. This must be managed effectively and no public highway disruption must be allowed, as this could interrupt the effectiveness of public transport operations. Similarly coaches should not be permitted to use bus lanes that will serve the Park; this will slow down the efficiency of the bus operation.

In addition there is concern that once these coaches have completed their drop off they will have to wait somewhere until they can collect their passengers at the end of the day. These locations will have to be defined and will have to be managed effectively to prevent overcrowding and disruption to the highway on entry and exit.

Water Transport

The River Lea could provide services from a number of areas; from the north – Edmonton, Broxbourne, Hertford and Luton. Alternatively services could come from the Thames along the Limehouse Cut (13a – 6.18.3). Entry to the Park would not be permitted, but moorings could be established on the Lea Navigation and the Rover Lea. (13a – 6.18.4).

Hertford Union Canal and Regent's Canal could also take services servicing Shoreditch, Islington, Kings Cross, Camden and Paddington; at Paddington connections to the Grand Union Canal link into the national canal network. (13a – 6.18.5)

The River Thames does not serve the Park directly but there are good connections from many of the East London Piers with interchanges with other public transport services (13a – 6.18.6).

The use of river services should not be underestimated. The establishment of a river based infrastructure for the Olympics will provide a valuable legacy post games. The more people using the rivers as a transport route for the Olympics the more use

these networks will gain in legacy, this will bring about rejuvenation effects along all river and canal routes, this will increase to a greater use of towpaths and river walkways. This in turn will provide greater natural surveillance and increase activity.

The use of rivers and canals should not be seen as an aspiration, but as essential for delivering legacy benefits not just to the Park but to all the routes the canal and river networks traverse.

Public Transport

The London Olympics is planned to be a 'public transport games' with all ticketed spectators to travel on public transport or by walking or cycling, with those driving for part of their journey using park and ride services (13a – 6.2.3)

Rail

Three Stations have been identified as the 'Olympic Park Gateway Stations.' They are Stratford Regional, Stratford International and West Ham stations. 12 different rails services will operate through them. (13a – 6.2.11) The OD and other stakeholders are developing a capacity enhancement scheme for Stratford Regional Station for Legacy and temporary Games passenger use (13a – 6.2.12). Proposals for West ham include new public transport links and spectator access through the Greenway to the Park (13a – 6.2.13).

Eurostar services will operate from St, Pancras International station when Stratford international opens. During the Games the Javelin rail shuttle will be operated between St Pancras and Ebbsfleet via Stratford. The service will be 7 minutes with up to 10 trains per hour; it will deliver some 25,000 people per hour to Stratford International. (13a – 6.2.14/15)

Local Bus and Coaches

The additional demand for local bus travel associated with the Olympics will be accommodated through the utilisation of spare capacity on existing services and temporary frequency enhancements to existing services (13a – 6.2.20)

Olympic Trips

Day 7 of the Games is anticipated to be the highest demand in attendance to the Park. The following mode splits have been forecast, these do not include the western pedestrian/cycle access and the Olympic family:

Mode	Spectators	Workforce	Entry/Exit Point		
			Northern	Eastern	Southern
Rail	78%	81%	0%	83.5%	16.5%
Bus	3%	6%	0%	100%	0%
Park and Ride	10%	8%	70%	0%	30%
Coach	8%	0%	70%	0%	30%
Walk/cycle	1%	5%	33%	34%	33%
Total	100%	100%			

(13a – 6.2.33 – table 6.2)

Assessment of Public Transport Effects

It is anticipated that Pudding Mill Lane station will be closed for the duration of the Games and that demand management and ticketing measures will seek to ensure that Hackney Wick Station is not used for access to the Park (13a – 6.9.2).

Seasonal adjustments were made to the assessments along with a further adjustment by an Olympic downturn factor of 8% taken into account (13a – 6.9.5).

There are large increases in flow eastbound passenger travel in the morning peak in the order of 97,000 passengers, for both spectator and workforce trips. Large increases are also forecast on National Rail 'one' services from Liverpool Street (13a – 6.9.8).

The evening peak shows increases that are smaller and more balanced, but the westbound flows are set to increase by 45% (13a – 6.9.10).

Crowding levels on rail services appear to be not significantly affected, with the exception of counter-peak flows from Mile end to Stratford and the Jubilee Line between London Bridge and North Greenwich. (13a – 6.9.15)

The DLR between Bank and Poplar will experience an increase in an appreciable level of crowding (13a – 6.9.46).

In the evening peak sections of the DLR network between Bow Church and Poplar become very crowded (13a – 6.9.18). The closure of Pudding Mill Lane station is accommodated by the use of Bow Church as an alternative (13a – 6.9.19).

Bus Demand

Local Bus services will cater for 3% of spectators and 6% of workforce travel, accounting for 7,500 spectators and 4,650 workforce trips. In the AM peak this will represent some 2,500 passengers and in the PM peak 2,700 trips (13a – 6.9.20).

Public Transport Measures Envisaged

Rail

There are a wide range of public transport projects either being delivered or funded by organisations other than the ODA or are 'Olympic' Schemes funded partly or wholly by the ODA (13a – 6.10.1).

Station/rail upgrade works are proposed for:

- *Stratford Regional Station*
- *West Ham Station*
- *The North London Line Conversion to DLR between Stratford and Canning Town*
- *Increasing frequency from Stratford to Highbury and Islington up to 8 trains per hour*
- *LUL line, capacity and station upgrades as part of the PPP improvements*
- *The Javelin rail shuttle service*

(13a – 6.10.2-5)

Some DLR services are considered to be operating at severe overcrowding levels during the Games. DLR and Serco are undertaking detailed analysis of potential service enhancements, in particular 3 car extensions (13a – 6.10.6).

Bus Measures Envisaged

London Buses intends to undertake detailed planning of the Games bus network during 2008/9 once more is known of the distribution of spectators and workforce, taking into account progress in implementing ongoing modifications to the bus network and bus priority in East London. London Buses have agreed design principles as follows:

- *Local bus services to provide access to the eastern, southern and northern entrances; with ticketing strategies reserving the western access for pedestrian and public transport.*
- *New regional bus station at Stratford*
- *Existing capacity will be utilised with temporary frequency enhancements implemented on certain routes*
- *Temporary extensions to bus routes and new dedicated bus routes will be considered*
- *Route extensions on the west side of the Park which may be needed to serve the northern entrance – in particular routes 26, 30, 236, 399 and 388.*
- *A reserve fleet of buses may be used to cater for peak demand and highly tidal demand.*
- *Planning for Games phase services assuming 90% occupancy.*
- *Temporary traffic management measure on bus routes*

There is concern that longer distance bus routes to Stratford have sufficient capacity to accommodate all demand. In particular, the number 25 should not reach overcrowding with spectators before reaching Tower Hamlets. This will prevent the local population from accessing this service for daily needs. It has been suggested that there are direct/express services with minimal stops, supplemented by services on the same route that serve all stops or inter-stop services during Games time.

With West Ham as a destination station for the Olympic there is concern that the Jubilee Line will not be able to serve both the Olympics and Canary Wharf. There appears to be no mention of working with the Canary Wharf business to promote flexible working over the Olympic and Paralympic Games period.

Far more detail is needed on crowd dispersal measures that are planned for Stratford stations and West Ham, and ensuring that they do not compromise local and commuter traffic not linked to the Games.

There is concern about the increases on the Central Line at Mile End, the North London Line at Hackney Wick and the Jubilee Line. Will passenger increases on these lines prevent access on to the services at non-Olympic destination stations, causing station overcrowding and passengers, not related to the Olympics, being unable to access services. Further

Research and details of crowd management and service accessibility is needed at these stations and on these routes.

Similar studies need to be carried out on the DLR and associated stations; particularly at Poplar, which is an interchange station. With Pudding Mill Lane station

closed for the Olympics there may be an increase in traffic at Bow Church DLR, this needs to be assessed and management measures agreed and implemented.

DLR potential service patterns greatly enhance the capacity of the Woolwich Arsenal branch, but reduces capacity on the Stratford branch; this leads to overcrowding North of Poplar. Research and mitigation measures need to be implemented

The Bus network lacks detail and is awaiting further details promised in 2008/09. There is no mention of bus crowding. The 25, 108, 276, D8 and S2 all pass within 200m of the southern entrance and spectators may choose to alight here rather than continue to Stratford. Measures need to be in place to deal with this eventuality.

The 26, 339 and 388 currently terminate on the western side of the park; these should be extended to Homerton Road to serve the northern entrance.

In view of train overcrowding the introduction of the D5 service between Canary Wharf and Liverpool Street would help to relieve the demand experienced and could provide wider legacy benefits.

Walking and Cycling

Promoting sustainability is at the heart of the transport strategy. Walking and cycling play an important role in supporting this objective, The 'Active Spectator Programme' will ensure that spectators are encouraged to walk and cycle to venues.

Three main spectator demand groups have been identified, each with different distribution characteristics:

- *Greater London residents (32%)*
 - *Overseas spectators (33%)*
 - *UK regional spectators (35%)*
- (13a – 6.15.3)*

It is anticipated that the majority of visitors walking and cycling trips will be generated from the Greater London residents (13a – 6.15.4).

Routes and Entrances

There is scant mention of the most important access route from Victoria Park along the Greenway to the western access. This route will require significant upgrading and measures to facilitate the volume of pedestrian traffic anticipated. These improvements need to be permanent and remain as a Legacy.

Cycle Parking Locations

There have been 2,000 temporary spaces provided in Victoria Park for cycle parking (13a – 6.15.11). It has been anticipated that 2% of all visitors to the park will use the western entrance 13a – 6.15.13).

Cycle Parking Design

Criteria for good cycle parking facilities include:

- *Located as closely as possible to the Park entrances*
- *Well signed and easy to find, enter and leave*
- *Secure entry/exit system*
- *Free of Charge*
- *Additional attractions e.g. bike maintenance, demonstrations and information.*
(13a – 6.15.17)

Provision will be made to allow mobility impaired cyclists to park their machines as close to entrances where possible, this to be increased during the Paralympics (13a – 6.15.18).

Walk Cycle Measures Envisaged

During the Games the Greenway from Stratford High Street across the Park and sections of the Lea navigation towpath will be closed, the preferred alternative being along Stratford High Street (13a – 6.16.1). This is dependent on appropriate cycle and pedestrian facilities along Stratford High Street Bow Interchange and those necessary portions of the Lea Navigational towpath (13a – 6.16.2).

Improvements to the primary pedestrian and cycle routes to access the northern, southern and western entrances include:

- *Appropriate direction signage and road markings*
- *Environmental enhancements to the streetscape, lighting, paving*
- *Appropriate management of cycle routes along waterways due to capacity issues*
- *Environmental enhancements along A11 and to pedestrian/cycle crossings at Bow Interchange*

(13a – 6.16.5)

More detail needs to be supplied on the operational and management arrangements for the secure parking facilities. It is unclear as to the effect of cycle parking locations, Victoria Park may be considered too far for some users and additional facilities may be needed to meet needs.

Is there provision for informing cyclist when facilities are full and where additional facilities may be located, will there be overspill arrangements? This needs to be considered and planned for by the ODA in plenty of time and in locations that are equally as accessible.

A route audit needs to be commissioned similar to Cycle Route Implementation and Stakeholder Plan (CRISP) methodology.

There are seven stations within walking distance of the site, whilst passengers will be directed to use the 3 main hub stations of Stratford International, regional and West Ham, many passenger s who are London based may choose to alight at other stations, based on local knowledge, to access the Park. Walking audits need to be implemented to ensure these routes are accessible and safe, plus appropriate measures put in place.

Olympic and Legacy Facilities Transformation

The Legacy Transformation of the Park is based on the fact that 18 -24 months after the Games the temporary facilities in the Park will be dismantled and removed and the remaining venues will have been transformed to Legacy use. In the intervening periods the Park will be re-opened in phases, with limited access. It is anticipated that the venues will be operational in 2013/14 (13a 7.1.1).

Highways

The dismantling of the temporary facilities will require some heavy goods vehicle activity, but this will be less in number than the enabling and construction phase, but with higher numbers of specialist contractor and service vehicles. However numbers are due to be less than in the peak in construction phase, making the impact less significant (13a – 7.1.2).

There is an aspiration to manage construction traffic during inter-peak and off peak periods. There will be limited car parking on site although travel by public transport is to remain an important mode for many construction workers.

The reduction in HGV traffic is welcomed, the increases in service and smaller vehicles will be of some concern, as it will generally be more difficult to route manage their entrance and exit routing from the park. Managing traffic at inter and off peak times should be a fundamental guiding principal of the delivery of the Legacy Transformation. The use of public transport by construction workforce should not just be an “important” mode, it should be the primary mode and target figures should be established to enable the Travel Plan Group to have figures that can be monitored.

Legacy Venue Demands

The assessment of venue travel demands have been considered in conjunction with the reduction in capacity of the venues left in Legacy (13a – 7.3.2).

Looking at event calendars similar to the venues that are considered trip generation is likely to occur at weekends and late/afternoon and evenings weekdays. This also illustrates that there is more dependency on car travel to venues on a weekend compared to a weekday, which is predominately public transport use. Travel plan strategies can reduce car dependencies (13a – 7.3.10)

It is of major concern that an assumption has been so car-centric. Whilst there is an understanding that there may be car demand for the venues in legacy, the applicants should have begun with a premise of zero car activity to access the venues and worked from that starting point back to design of the legacy venues. There is much discussion of the improvements to the public transport networks as a result of the Games, this should be capitalised upon for legacy venue operations. Travel plan strategies would be far more effective should car travel be considered as zero.

Legacy Venue Car Parking

Car parking requirements have been calculated for each venue in legacy based on daily requirements and event demand and listed below (13a – 7.3.12/13):

Venue	Capacity	Daily Demand	Parking (staff +	Event Demand	Parking
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		visitors)	
Aquatics	3,500	65	140
Main stadium	25,000	45	960
Handball Arena	10,000	190	960
Handball Arena (concerts)	11,500	n/a	1,180
Hockey	5,000	135	600
Tennis	n/a	110	n/a
Velodrome	3,000	285	360
BMX Track	n/a	55	n/a
Totals		885	4,200

There will be regulation of car trips by spectators and a reduction in the space given over to car parking; consideration of this will be enacted with a travel plan framework for legacy venues:

- *Use of other car parking spaces within the Park*
- *Use of park and ride and local car parks*
- *Temporary on-street parking measures outside CPZ*
- *Ticket sales including public transport advanced tickets*
- *Parking charges to dissuade car use*
- *Disabled parking to be advertised with assisted transfers*

(13a – 7.3.15)

The retention of the IBC/MPC multi-storey car park is identified, which will house 1,300 spaces. This is within walking distance to all venues (13a – 7.3.17).

Whilst a zero car assumption would be ideal for the venues, it is acceptable that some parking will be required, particularly for event contributors and workforce needing transport outside of public transport hours. It is welcomed that the venues are looking to rationalise as much parking in the IBC/MPC car park, a statement of operation of this car park needs to be agreed, to ensure that there is sufficient space allocated for venue parking, and that parking isn't allocated to the businesses that take over the IBC/MPC building in Legacy.

With the exception of the Hockey venue, all event figures are within 10% of capacity. A full understanding of the need for the Hockey venue to have nearly 40% parking during the event needs to be submitted and agreed. A standard of less than 10% should be applicable across the whole site.

Legacy Venue Coach Parking

A base coach provision of 2 to 5 spaces at each venue is considered appropriate for drop off and pick up for daily demand and could be utilised for events as well (13a – 7.3.19/20).

The IBC/MPC provides space for 30 coaches to park. This should be more than enough to accommodate most events at the Park; however the main stadium hosting an event may need up to 105 coach spaces. These could be accommodated in the following way (13a – 7.3.22/23)

- *On site at each venue including the use of the IBC/MPC car park*
- *An off site and nearby temporary facility*

- *Shared coach parking provisions at other nearby off-site venues*

The use of coach services is preferable to car parking and efforts should be made to transform more of the car parking spaces in the IBC/MPC to accommodate coaches. The Travel Plan must include detailed management and control of coach traffic, including scheduled pick up and drop off times and locations, to ensure queuing does not occur on the public highway.

Legacy Transformation Highway Network

The highway networks constructed and used internally in the Park during the Games will be returned to the Highway Network gradually over the transformation period, they will be delivered according to the following timetable (13a – 7.4):

End of Games plus one month

The opening of a loop road around the IBC/MPC using Waterden Road and the Lea Interchange. A new junction will be required on Carpenters road and Stratford High Street to facilitate east-west traffic.

A temporary junction at White Post Lane and the Loop Road to facilitate transformation traffic.

End of Games plus 6 months

The Western Access route to Stratford City will be completed and the remaining parts of Waterden Road.

The use of bridges adjacent to Carpenters Road and the railway line will enable a two-way route from Waterden Road and Carpenters Road/White Post Lane Junction enabling access to Legacy venues and enabling the Legacy bus routes to begin.

A highway link between the Stratford City Southern Access Road and the Loop Road to enable greater connectivity between Carpenters Road, Stratford High Street and Stratford City.

End of Games plus 12/18 Months

The road network is envisaged to be completed in 12 -18 months, dependent on the final scope of the transformation works.

The junction with the Loop Road and White Post Lane would still be required as part of the 2013/14 network to facilitate access to the main stadium, and until such time as development occurs in Zone 4 and the permanent internal road connections and highway bridge to Monier Road are made.

Western Bridges

Connection to the surrounding network will initially be via the existing bridge at White Post Lane. Provision is being made for the western bridges linking Wallis Road, Monier Road and Stour Road to be provided as the project develops.

The opening of the highway network in 18 months is welcomed and should alleviate any congestion issues that have been in place since the site was closed for construct.

Extreme concern surrounds the bridges on the western side of the park; it appears that there is no guarantee that these bridges will be constructed as permanent bridges in legacy. The construction and Games bridges are only identified as temporary bridges and it appears from the comments in the application that these bridges will become permanent dependent on development in Zones 3, 4 and 5.

These bridges are essential to the regeneration of Fish Island and the accessibility of the Western areas of Tower Hamlets to the Park and Stratford from Tregedar Road. These bridges must be constructed as permanent bridges in the Legacy Transformation. It would be preferable that they be constructed as permanent structures during construction.

Road Hierarchy

A number of design considerations have been taken into account for Legacy roads including (13a – 7.4.22):

- *Widened footways on streets that will form main pedestrian routes to event venues*
- *Accessible bus stops*
- *Appropriate kerb spaces or designated areas for coach/bus parking for district or local distributors where they are located near event venues in order to accommodate vehicles*
- *Ensuring pedestrian/cycle routes use appropriate streets where they can be visible to all other users*
- *Pedestrian and cycle routes should be barrier free where possible and not segregated*
- *Emergency vehicle access to development and venues*
- *Waste/servicing access and bays on/off street considered during design*

The strategy provides a number of opportunities for improving pedestrian, cycle and vehicle connections across the Park. The issues considered include (13a – 7.4.23):

- *Designing roads fronting parkland as local access streets where possible to minimise severance to the Olympic Park from existing and proposed residential areas*
- *Locating and designing roads adjacent to proposed Legacy Venues with the view to minimise effects of events on future residents and neighbouring residential communities.*
- *Keeping any through traffic on appropriate roads*
- *Improved pedestrian/Cycling connections across the River Lea*
- *Improved pedestrian/cycling connections from the Greenway to Victoria Park*
- *Proposed high profile cycle and pedestrian links via Wallis Road to/from the west*
- *Improved pedestrian/cycle connections north-south across the site*
- *Possible future connections from Hackney Wick Station to the site*
- *Improved pedestrian/cycle crossing of Stratford High Street for the Greenway*
- *Potential new bus connections to Hackney Wick*

These design statements are welcomed and will do much to provide a more accessible and permeable route through the site.

More emphasis should be placed on connecting existing communities, such as Fish Island and Bow with the site and through to Stratford. This would bring about significant benefits to the regeneration of these areas; thereby providing greater residential and commercial opportunities.

Highway Network Assessment

The 2013/14 traffic flow assessments are considered with the Legacy venues as transformed and a partially operating IBC/MPC. In addition changes in population and employment are consistent with the Opportunity Area Framework (13a – 7.10.1).

The scenarios generally show small increases in traffic flows, limited and localised around the Park (13a – 7.10.2). Flow increases on the perimeter of the Park are seen as minor, whilst internal Park flows are larger, associated with increases in population and employment (13a – 7.10.3). The East Cross Route is seen to demonstrate a reduction in traffic flows of around 1%.

Junction Assessments

A12 Bow Interchange – General traffic management and signal optimisation will be required to ensure the junction operates satisfactorily during legacy operations and additional event traffic, particularly with respect to monitoring/controlling internal queuing (13a – 7.10.14).

B142 Tredegar Road/East Cross Route – general management as well as the signalisation of this junction is proposed for legacy operations. The temporary signals were proposed in the Games phase, it is proposed to introduce a pedestrian phase across the Northern side. Signalisation will bring a reduction from 105% saturation to around 57% during AM peaks, with PM peaks remaining below 85% saturation (13a – 7.10.15).

These proposals are welcomed.

Highway Measures Envisaged

General transport management measures envisaged are:

- Appropriate signage for pedestrians and cyclists to use alternative/diverted routes*
- Appropriate highway and kerbside signage for diverted bus routes and temporary bus stops as well as notification to all users*
- Improved lighting and security measures in order to increase usage of routes by pedestrians, cyclist and workforce*
- Improved streetscaping, surface treatments and landscaping on routes and diversionary routes to communicate to vehicle users to respect the existing community they are passing through*
- Monitoring and maintenance of road/line markings, lighting, signage, and general street cleaning and sweeping*
- Improved streetscaping, surface treatments and landscaping or disabled people.*

(13a – 7.11.1)

There will be a need for a number of off-site junctions that will experience saturations above 85% in legacy. The management and monitoring of these junctions will be considered along with TfL and the boroughs. These include (13a – 7.11.6):

- *Tredegar Road/ St Stephens Road*
- *A11 Whitechapel Road/ Osborn Street*
- *A1209 Bethnal Green Road/ Vallance Road*
- *B118 Old Ford Road/ Globe Road*
- *South Colonnade Canary Wharf*
- *A11 Bow Road/ Fairfield Road*

Mitigation/Improvement measures should be considered by the boroughs, particularly where there is little scope for any significant physical changes to improve traffic flow or for introducing bus priority measures. It is also noted, by the applicant, that there are developments currently under construction or proposed which may introduce further changes to their operation or improvements which by 2013/14 will need to be taken into account by the local authority.

These comments about the above junctions and putting the responsibility on the Local Authority appears to be a wilful discharge of the ODA's responsibility to mitigate the impacts of their development on the wider area. It introduces a Park-centric view of their responsibilities in Legacy and does not further the regeneration of the wider area.

These junctions will require designing in conjunction with the wider network, which will be severely affected by the Legacy proposals. It is, therefore, essential that these junctions be taken under the proposed OPTEMS system of delivering highway improvements and mitigation.

The section of Wick Lane from the junction by the bridge to Monier junction is a serious concern in view of the relocation of the bus depot, the new links from Monier Road across the river and the Greenway emphasis. To provide safe access to the western access, as well as deal with all these changes, this site needs new a major highway scheme to improve safety and traffic flows before the Games - not afterwards as currently suggested.

Parking and Loading Measures.

Enforcement of loading restrictions to facilitate better pedestrian, cyclist, public transport and construction workforce and vehicles will be needed, in particular Bow (13a – 7.11.9).

During Transformation phase, particularly during events, the continuation of the Games CPZs should be made in order to discourage event traffic. This is particularly pertinent to Bow and Bromley areas (13a – 7.11.10). These measures will need to have funding secured against the event venues and should be included in all travel plan requirements in perpetuity of the venue operations.

Any traffic calming measures introduced for the Games will need to be reviewed, it is likely that these will remain and refined to maximise environmental benefits.

These measures are all welcomed and the OPTEMS route seems the best avenue to deliver these operations with contributions from the Park.

Legacy Parking Standards

These will be delivered in accordance with the London Plan and will be as follows (13a 7.12.1):

Land Use	Rate
Residential	2-1.5 spaces detached & Semi detached 1.5-1 spaces: Terrace/Flat 1 or less space: mostly flats
Retail	PTAL type dependent
Employment	1 space/ 600-1000 sqm
Education	Individual basis
Community/Leisure	Individual basis

There are proposals for the uptake of car clubs as part of the travel plan (13a – 7.12.2). No proposals are in place for motorcycle parking and will be considered in conjunction with the relevant borough and TfL (13a – 7.2.3).

No public parking will be provided close to railway stations (13a - 7.12.4) Cycle parking will be provided to comply with the relevant standards (13a – 7.12.5).

These parking standards are to be considered as both lazy and extremely poor, in both their proposals and in the potential to reduce car travel. The residential figures are far in excess of Tower Hamlets standards that currently exist in the LDF. These are proposals for 7 years in the future when it is anticipated that both Tower Hamlets and the GLA's plans will be far more stringent in reducing car dependency.

As a minimum all residential parking standards should be set at a maximum of 0.5 spaces per unit, only in areas with a PTAL rating below 3 and the rest of the site should be car free.

These standards, as proposed, do nothing to promote a sustainable legacy; they will mean that the aspiration to have the most sustainable Games will be balanced with the least sustainable legacy.

The non-inclusion of motorcycle and cycle parking standards is again lazy and extremely poor. The Legacy site should be aiming to be a world leader in providing cycle facilities, parking and a severe reduction in car dependency.

Public Transport

Trip generation for the Legacy venues illustrates that most weekday trip demand will be in the late afternoon/early evening peaks as well as demands over weekends (13a – 7.3.10).

Public Transport Trips

Without event traffic there is an increase in Public Transport use of around 12% in both AM and PM peaks (13a – 7.5.4).

Assessment of the Public Transport Effects

The assessment includes partial operations at the IBC/MPC facility, with general increases in the population and employment in the area and the effect of Legacy venue operations (13a – 7.6.1).

There appear only minor increases on the North London Line and Central Line during AM peak (13a – 7.6.4). There will be small increases on Public transport due to the effect of the legacy venues themselves and the partial uptake of the IBC/MPC (13a – 7.8.3).

There could be small increases on the Jubilee line due to increases in population access in the network for employment opportunities (13a – 7.8.4). The effects are more pronounced in the PM peak due to the event operations. There is a possibility of people bound for the Main Stadium interchanging at Mile end for bus services. It is anticipated that the crowds at the rail termini would be managed similar to the Games management plans (13a – 7.8.5).

The enhancements to transport put in place for the Games will provide a major benefit in Legacy (13a – 7.8.6).

Bus Network

The enhancement of bus provision is likely to be aligned with the level of development and will ramp-up as new development comes on-line (13a – 7.13.1).

The 2013/14 network is based on the indicative 2021 bus network with some modifications to reflect the highway infrastructure and level and location of development in place by 2013/14. It comprises of the following elements:

- *Diversion of routes 276, 308, D8 into Stratford City*
- *Service frequencies will have to be changed due to Stratford City*
- *Route extensions and diversions are as close as possible to the planned routes for 2021*

(13a – 7.13.2)

Analysis indicates that there is sufficient capacity on buses on each corridor in 2013/14, on both weekdays and Saturdays. London Buses intends to refine the indicative bus network over time as the development progresses. (13a – 7.13.6)

Bus Priority

TfL have identified a number of bus priority measures in the area comprising of Selective Vehicle Detection to provide bus priority at certain junctions, in Tower Hamlets these include:

- *A11 Bow Road – westbound bus lane from the exit of the Bow Roundabout towards Campbell Road*
- *A12 bus lanes between Bow Interchange and Wick Lane*

(13a – 7.13.9)

Public Transport Measures Envisaged

The public transport network with event management is expected to be able to absorb demand in Legacy Transformation when an event is taking place. (13a – 7.9.2)

Walking and Cycling

End of Games plus 1 month

Re-opening of the NCN 1 on the Lea Navigation towpath, the improved elevated Greenway and a series of new pathways running north-south through the Park and east-west to connect Stratford City. There will also maximum permeability, as practicably possible, through the Park. Carpenters Road will be opened with a temporary connection to the Loop Road (13a – 7.15.3-5).

Plus 6 months

All dedicated strategic cycling and walking routes will be completed and fully accessible (13a – 7.15.6)

12/18 months

The A12 underpass at Temple Mills will be opened. (13a – 7.15.7)

Cycle Parking Provisions and Standards

All locations will have cycle parking that meets or exceeds the TfL design standards.

Venue	Capacity	Minimum Level	Parking
Aquatics	3,500	200	
Main stadium	25,000	140	
Handball Arena	10,000	140	
Handball Arena (concerts)	11,500		
Hockey	5,000	100	
Tennis	n/a		
Velodrome	3,000	200	
BMX Track	n/a		
IBC/MPC		500	
Totals		885	

(13a – 7.5.13 – table 7.24)

Walking and Cycling Measures

The cycle and pedestrian measures are intended to be designed to the highest standards available. Ongoing monitoring of cycle provision for residents, visitors and event spectators at the Legacy Park should be undertaken to ensure sufficient supply and appropriate located facilities (13a – 7.16.1/2).

There needs to be clearly identified monitoring standards and guidelines for monitoring need and provision; this will enable effective improvements to be commissioned. Ownership of the monitoring process has not been identified. It is suggested that the monitoring is handled by the Olympic Park Travel Plan Group, who should commission regular surveys by independent specialists such as Sustrans or the London Cycling Campaign.

Olympic and Legacy Facilities Operational (2021)

Highways

This phase sees the completion of the transformation phase, the Legacy venues are fully operational and increases in the population and employment in the Lower Lea Valley are largely realised. (13a – 8.1.1) It is noted that the Legacy venues traffic and trip demand will be the same as figures discussed in the Transformation phase, but the IBC/MPC facility will be fully operational (13a – 8.2.1). The highway network will be in full operation as stated in the Transformation stage with added connections facilitated by the Bridges to Monier Road, Wallis Road and Stour Road (13a – 8.3.1).

Monier Road Connection

This will provide a direct route towards Monier Road/ Wick Road and Dace Road junctions and towards the A12 on/off slips via Wick Lane. This junction suffers poor visibility due to bridge alignment and is likely to require environmental and junction improvements (13a – 8.3.3). Monier Road is proposed to function as a district distributor in Legacy 2021 (13a - 8.3.4).

This bridge access and junction improvement at Wick Lane is welcomed and should be part of the deliverables under the OPTEMS system.

Stour Road Connection

Stour Road will provide a primarily pedestrian and cycling connection from the west (13a – 8.3.5). The junction with the Loop Road and White Post Lane will be downgraded with a new junction created to the east for vehicles connecting with Carpenters Road from Waterden Road. The section of the Loop Road from White Post Lane towards the Monier Road Bridge will be downgraded to facilitate access to developments and to provide for future cycle and pedestrian use (13a – 8.3.7).

The establishment of Stour Road bridge as a pedestrian and cycle link is welcomed and the pedestrian/cycle prioritisation measures will be a benefit to sustainable communities both within the Park and to the West in Fish Island and Bow.

Assessment of Cumulative Highway Effects

The cumulative effect of additional housing and employment in 2021 has significant effect on traffic flows; in particular there are anticipated increases on the East Cross Route by 3%. This will be significant on an already high demand route.

These increases will come from both new residential and employment in the Park site. These can be reduced by a more responsible and stringent approach to parking standards and travel plans in the Park. It should be the responsibility of the Olympic Park Travel Plan group to implement measures to reduce car dependency.

Junction Impacts

A12 Bow Interchange – Marginal effects are anticipated, management and signal optimisation, particularly during events should be implemented.

B142 Tredegar Road/ A12 East Cross Route – General traffic management and monitoring of junction operations will need to be implemented to ensure that the

junction operates at an acceptable level. Funding through the OPTEMS system should be secured for the long term monitoring in Legacy.

Cumulative Highway Measures Envisaged

General transport management measures envisaged are:

- *Appropriate signage for pedestrians and cyclists to use alternative/diverted routes*
- *Appropriate highway and kerbside signage for diverted bus routes and temporary bus stops as well as notification to all users*
- *Improved lighting and security measures in order to increase usage of routes by pedestrians, cyclist and workforce*
- *Improved streetscaping, surface treatments and landscaping on routes and diversionary routes to communicate to vehicle users to respect the existing community they are passing through*
- *Monitoring and maintenance of road/line markings, lighting, signage, and general street cleaning and sweeping*
- *Improved streetscaping, surface treatments and landscaping or disabled people.*

(13a – 8.10.1)

General monitoring, maintenance and management of the surrounding network is proposed to react to the evolving road hierarchy (13a – 8.10.2).

The A12, A11 and Bow Interchange will experience greater flows; this will be in part due to the overall regeneration effects of the Lower Lea Valley (13a – 8.10.5). The Lower Lea Valley Transport Investment Group should work with the Olympic Park Travel Plan Group, the ODA, LDA and developers as sites progress through planning to ensure that parking is kept to a minimum in commercial and residential developments. This will ease pressure on the road network. It should be highlighted that the lead and best practice examples must be set by the Park. These are not evident in this application.

On going management of off site junctions will need constant management and maintenance (13a – 8.10.9). Funding should be reserved through OPTEMS to maintain this during Legacy.

Parking and Loading

These remain the same as the Legacy Transformation comments stated earlier.

Public Transport

Public Transport Assessment

General

The largest increases in passenger flows in 2021 are in the AM peak and on National Rail with around 2,000 additional Passengers, LUL services increase by around 1,250 primarily on the Central Line with minor increases on DLR and buses. In the evening peak the picture to eastbound flow increases (13a – 8.7.3).

Bus Network

The 2021 proposals incorporate all of the Stratford City bus route extensions and frequency enhancements, with some modifications to routings to serve the development within the Olympic Park; these will include: (13a – 8.11.2)

- *Diversions to bus routes 278, 308 and D8 into Stratford City*
- *Bus routes serving the Stratford International Station (services 8, 30, 97, 145, 262, 388, 339, D8, W14)*
- *Bus routes to serve Stratford Regional station (services 8, 30, 97, 145, 276, 308, 339, 388, D8, W14)*
- *Enhanced frequencies for bus services 25, 97, 104, 308, 339, D8, W14*

Public Transport Measures Envisaged

Analysis of the public transport loadings and crowding levels associated with the 2021 scheme indicates that proposed level of service and infrastructure should be sufficient to cater for the forecast demand (13a – 8.8.1).

A number of bus priority measures have been identified by the London boroughs. The prioritisation and timescale for implementation of these measures as the level of development increases is a matter of further investigation and discussion. (8.11.8)

Bus route enhancements and priority measures to support the 2021 Legacy development, together with enhancements, will be undertaken through consultations between the boroughs and London Buses (13a - 8.12.1).

On-going enforcement and management of on-street parking and loading, particularly on approaches to and from bus stops in order to minimise delays (13a – 8.12.2).

The overcrowding of Mile End station as visitors interchange with the bus network to access the main stadium is of great concern. Provision for crowd management at this station and physical measures need to put in permanently to accommodate this regular occurrence.

In addition there is a need to understand the real effects of this, or would passengers really continue on to Stratford?

Bus priority should include a westbound bus lane from the exit of the Bow Roundabout towards Campbell Road and the A12, with bus lanes between Bow Interchange and Wick Lane.

Walking and Cycling

Walk and Cycling Measures Envisaged

Bridge connections to the west of the Park to Hackney Wick and Bow will bring further enhancements to Legacy Networks. On-going monitoring and maintenance of the network and the use of these new links will ensure on-going attractiveness and increased usage (13a – 8.14.1)

Ongoing monitoring of cycle parking provisions for residents, visitors and event spectators will be undertaken to ensure efficient supply and appropriate location of facilities (13a – 8.14.2).

There needs to be clearly identified monitoring standards and guidelines for monitoring need and provision; this will enable effective improvements to be commissioned. Ownership of the monitoring process has not been identified. It is suggested that the monitoring is handled by the Olympic Park Travel Plan Group, who should commission regular surveys by independent specialists such as Sustrans or the London Cycling Campaign

Bridge improvements must be guaranteed and should be funded by the ODA through the OPTEMS system to ensure they are built in a timely and appropriate method, and so that they are not waiting for speculative development to fund them. This should be seen as an essential regeneration tool to attract development, not as a mitigation measure from future development.

More details are needed as to how the bridge will link in with existing cycle networks and who will be responsible for maintenance and development in Legacy.

A clear plan needs to be undertaken to ascertain the level of enhancement necessary for Legacy walking and cycling.

Links out of the park, the greenway beyond the Park to Victoria Park, the access routes across the A12 all need to be considered in legacy. It appears at present that the improvements and development is Park-centric. There is a need to ensure links are accessible, attractive and safe which service the Park beyond its boundaries. Otherwise the new links will rapidly become redundant, unused and unsafe.

Travel Plan Framework

This is an acceptable framework to begin to design a Travel Plan for all phases of the site from Construction to Legacy 2021. However it needs to be refined and developed to become a world class travel plan. At present it does not shine above existing travel plans currently in operation in many London developments. More innovation and exciting new strategies need to be included.

This should be the remit of the Olympic Park Travel Plan Group to develop for each of the phases of development. There is substantial scope for improvement.

Construction Phase

This will be discussed under the Code of Construction Practice Olympic Games and Paralympic Games Travel Plan.

The details of this should be enshrined in the Olympic Travel Plan, the revisions that are due after Beijing should be informed by the Olympic Travel Plan Group and should seek to be innovative and Stringent in reducing carbon emissions and delivering a pioneering attitude to sustainable transport. This was significantly lacking in the original transport plan.

There is no mention of internal transport during the Games; all internal transport should be facilitated by a fleet of electric and carbon neutral vehicles. The provision of recharging stations and top up points would be a lasting legacy during transformation and the infrastructure to provide this would be better supplied during construction.

Legacy Travel Plan

The legacy Travel Plan is in far more detail.

Car Parking/Car Clubs (13a – 9.6.4/9.6.7/9.6.17/9.6.18) – this does not reflect an appropriate and responsible attitude for reducing car dependency. There needs to be strict standards in place and a commitment to being the largest car free development in Europe, if not the world. The introduction of car clubs are welcomed. However many new developments are actively promoting these through benefits to members, price reductions and positioning spaces in priority spaces.

Cycle Parking (13a – 9.6.6/9.6.9/9.6.15) - These policy goes no further than many older aspirations in developments that have been in operation in the borough for many years. There should be more emphasis in providing more than 1:1 cycle parking, imaginative, accessible and well located cycle parks for residential, commercial, venues and business. There should be a minimum level of support on site, through changing and shower facilities, lockers, repair and maintenance areas, plus the commitment to provide a cycle retail hub. The Legacy should be the best in the world, not a provision at 2004 levels. However the free transport home in the event of an emergency shows a step in the right direction.

Public Transport (13a – 9.6.12) – Personalised travel information is a great step towards providing transport information and is welcomed. This is supported by a season ticket loan scheme.

Motorcycling (13a – 9.6.16) – This basic policy could be enhanced with provision for electric two wheeled alternatives.

Servicing and deliveries (9.6.20) – These policies are only promotion and encouragement policies. There is scope for more direct means, the site would be ideal for a consolidation hub for deliveries, where deliveries could be then distributed around the site with carbon neutral vehicles. Businesses could be tied by their applications and lease agreements into more sustainable measures.

Workplace practices and policies (13a – 9.6.21) – This again is an encouragement policy, there needs to be more emphasis on delivering some building standards, lease obligations or other enforcement measures.

Optimising Fiscal Initiatives (13a – 9.6.22) – These measures are more exciting and are welcomed

Retail Uses (13a – 9.6.24) – These measures are welcomed, but possibly could go further with retail consolidation schemes for deliveries, requiring food retailers to sourcing food locally, delivery consolidation hubs.

Education (9.6.25) – The measures identified are welcomed but do not include teacher travel. All schools should be established as being car zero. In addition if the site becomes a world leader in sustainable transport and the travel plan becomes a best practice example it could be of educational benefit to the rest of the UK, this would be a true legacy.

Event Management (13a 9.7) – Park and ride is an acceptable measure and should be extended to remove more private parking. It would be good to see parking reduced to just disabled visitors and event personnel either competing or performing, where no other alternative can be made. Ticketing initiatives are welcomed.

Summary

It seems a shame that the Park that is being delivered for the Olympic Games in Legacy does not recognise the potential it has to be a world leader. The impetus for change has come from sport, but the Legacy seems quick to revert back to lazy travel options. More emphasis should be put on healthy transport; encouraging visitors to burn calories not fossil fuels.

This Travel Plan framework falls far short of being a world class example of best practice for delivering sustainability into the future.

Bridge Design and Construction

This section covers the physical structures themselves and their design from an engineering structure; the location and value of the bridges are discussed in the main text. The bridges examined are only those that affect Tower Hamlets.

The plans submitted have shown the bridge structures Temporary Bridges only; these are considered to reasonable and orthodox in design. As they will not form part of the public highway, as they are only temporary they are not the responsibility of this Highway Authority.

It is disappointing that these structures have not been designed to be permanent, particularly as they appear in legacy. It would have been far more preferable to deliver these as permanent structures for the Games and the legacy benefits would have been in place from immediately the Games has finished.

Any permanent structure that replaces these temporary bridges will require technical and highways approval by Tower Hamlets.

Code of Construction Practice (CoCP)

The CoCP supports the planning application for site preparation works, venue and infrastructure construction. Similar principles will be adopted for Legacy Transformation (15- 1.1.1). The document submitted is considered to be Part A – which sets out the general objectives and measures to achieve them for all construction works for the ODA. Part B will set out the specific standards and measures that will be used for each delivery zone or venue construction package; to be prepared in consultation with relevant local authorities prior to construction 15 – 1.1.5).

Concern is raised at this point that the Part B construction practice documents will be delivered by the contractors and will not be inclusive enough of all the effects. By diluting the CoCP by a number of contractors, the effects of construction will be worsened and become less able to be monitored and enforced.

The ODA needs to take ownership of the delivery of the CoCP at all levels and provide a dedicated body of independent monitoring and enforcement personnel, and provide real enforcement powers in the case of a breach of the CoCP.

The CoCP is split into a number of Environmental Management Plans covering a range of topics. Transportation and Highways will examine the following, where they relate to transport:

- General site operations
- Transport Management Plan
- Noise and vibration
- Dust, odour and vehicle emissions

General Site Operations

Working Hours (15 – 3.3)

The working hours of the site will be:

Monday – Friday	07:00 – 18:00
Saturday	07:00 – 14:00
Maintenance and repair	
Saturday	14:00 – 16:00
Sunday	08:00 – 16:00

In addition one hour start up and shut down period will be in operation and not include any noisy activities. Bank Holidays will operate as Saturdays. Operations that are seasonal or affected by public transport delivery may occur outside of these hours; to include overnight working, weekends and Bank holiday timings.

Road, Rail and Water deliveries will be 24 hours a day, 7 days a week to reduce the amount of deliveries affecting peak flows. Road deliveries to site will be managed and controlled through a delivery booking system.

The delivery booking system should be robust enough to accommodate early and late arrivals due to road and highway delays; this will prevent vehicles stacking on

the highway, parked in unsuitable areas and congesting the road network outside the park.

Temporary Living Accommodation

Where this is provided on site, it should comply with Local Authority Standards and be licensed accordingly. Whilst the provision of on-site accommodation will reduce workforce transport trips to the site, it should be noted that car parking for residents of this accommodation should be set at zero.

Public Access and Transport Management

The objectives of the CoCP for transport cover the following (15 – 4.1.1):

- The removal of public access from the site
- The ODA will endeavour to carry out works limiting the effect of traffic flows and disruption on the highways; including the optimisation of rail and water where reasonably practicable

The removal of public access is understood and the Transport Assessment covers alternative routing. The statement to use rail and water for deliveries is welcomed, but more emphasis and targets need to be included.

General Provisions (15 – 4.2)

- The ODA will require the stopping up of highways.
- Site access points for construction traffic, construction personnel and emergency access will be identified for vehicles, pedestrians and cyclists.
- The ODA will consider options for reducing the quantities of construction materials requiring transfer by public roads so far as reasonably practical.
- Construction transport routes will be identified and discussed as necessary with the relevant local authorities

It is alarming that the site access points have yet to be identified and the routing of traffic immediately around the site has not been provided. This is unacceptable and provides no assurance for Tower Hamlets or their residents and business as to the potential impacts of the construction. More detail needs to be submitted at a global level rather than based purely on the Planning Delivery Zone method of notification. A general condition for the whole site needs to include these details.

Transport Management Plan

The details set out in section 4.3 of the CoCP cover a wide range of measures; however the details are not set out beyond basic aspirations and protocols. There is not firm commitment to the actual measures that will be implemented. There is no comfort in this plan.

More precise details on how these measures will be implemented will need to be agreed and approved prior to any construction. Construction contracts based on this plan will result in vague and confused delivery. These criteria need to be more precise to allow for effective monitoring and enforcement.

There is no mention in the plan how the measures will be monitored and enforced. These are essential to protect the neighbourhood surrounding the park and the impacts on the highway.

Temporary and Permanent Road Closures (4.4)

- Ensure Public Notices are issued
- Provide and maintain signs and barriers
- Should be implemented for as shorter time as possible
- Discussions with known affected parties before implementation
- The site will become enclosed during construction, the Games and Transformation phases.

These issues are understood and details of mitigation measures are discussed in the Transport Assessment.

Diverted Rights of Way (15 – 4.5)

The ODA will ensure as far as reasonably practical that diverted rights of way will be provided and maintained to a similar standard to those that they replace.

This commitment should go further and provide diverted rights of way to a condition acceptable to current local authority or national standards, improvements should be made where necessary to satisfy safety, accessibility and attractiveness.

Road Cleanliness (15 – 4.6)

- Hard standing at access points cleaned regularly
- Vehicle clean down points
- Correct loading weight and sheeting of HGVs
- Mechanical road sweepers and water sprays for the suppression of dust and to clean hardstandings, roads and footpaths in the vicinity
- Flushing of gullies
- Sheeting Loads

These points are all welcomed. However there is no mention of how these will be monitored and enforced

Highway Reinstatement (15 – 4.7)

- Where temporary alterations are made the highway will be restored to the reasonable satisfaction of the Highway Authority
- The condition of the relevant parts of the highway will be recorded prior to the commencement and after completion of the ODA's works, in consultation with the Highway Authority. The Local Authority may send a representative if they wish. Remedial works will be undertaken to the reasonable satisfaction of the relevant highway authority
- Surplus materials will be removed leaving it clean and tidy.

These comments are welcomed

Large Vehicle Controls (15 – 4.8)

- As part of the Transport Management Plan, routes for large construction vehicles will be identified. These routes will primarily be major roads – A roads and Motorways, except for immediate access points to the Park. Local routes for large construction vehicles will be sought from the relevant authorities
- Deliveries will be 24 hours a day 7 days a week to alleviate pressure on the highway network. Deliveries to site will be managed and controlled through a delivery booking system with marshalling points to hold vehicles until required on site
- No parking of large vehicles on the highway in the vicinity of any work site except in specifically designed holding areas. Delivery vehicles will be required to turn off their engines when waiting within or near the park.
- Appropriate control system implemented for the dispatch of vehicles containing excavated material.
- Control requirements will be put in the contract documents for each contractor. The ODA will monitor and audit compliance, and employ enforcement measures in accordance with the enforcement protocol to ensure, as far as reasonably practicable, compliance
- Signs will be displayed in a prominent position on large goods vehicles using public highways which are dedicated to the ODA's project
- Weighbridges will be installed in suitable locations

These points are welcomed; however the enforcement and monitoring measures are incredibly vague and have no detail or substance to them. As an aspiration they are fine, but as a practical measure that can be assessed they are useless. More detail and exact procedures need to be designed and approved before any construction traffic begins to access the site.

Access for People with Reduced Mobility (15 – 4.9)

- Where reasonably practical the ODA will conform to the DDA 1995 concerning access to buildings and services outside the Park where there is disruption caused by their operations
- Where normal routes have been blocked off, alternative safe routes will be identified
- There will be a site by site account for mobility impaired access

These items are welcomed. However liaison groups should be set up specifically to deal with mobility impaired access and transport during construction.

Noise and Vibration (15 – 5)

Noise and vibration by transport will be controlled by routing measures (15 – 5.4.1).

This is welcomed but without routing details then it is impossible to determine the impact.

Dust, Odour and Exhaust Emissions (15 – 6)

- All engines of all vehicles and plant on site are not left running unnecessarily
- Use of low emission vehicles and plant fitted with catalysts, diesel particulate filters and similar devices
- Plant equipment will be well maintained and serviced, with records kept
- All project vehicles, including off road, will hold current MOT certificates

- Locating long haul routes and operating plant away from potential receptors such as houses, schools and hospitals
- Maximising energy efficiency (this may include using alternative modes of transport, maximising vehicle utilisation by ensuring full loading and efficient routing)
- Commercial road vehicles must meet European Emission Standards

In addition Construction Traffic will be required to adhere to the following:

- Switch off engines
- Vehicle cleaning and fixed wheel washing on leaving the site, plus damping down of haul routes
- All loads entering and leaving the site to be covered
- No site run-off of water or mud
- On-road vehicles to comply with set emission standards
- On road vehicles to comply with future standards of a possible Low Emission Zone
- Minimise movement of traffic around the site
- Hard surfacing and effective cleaning of haul routes and appropriate speed limit around the site.

These measures are welcomed; however there should be a commitment to use electric and alternative fuelled vehicles with in the site, where practicable.

Summary

Many of the points and aspirations in the CoCP are welcomed and will do much to reduce the impact of construction in the locality. However there is a lack of detail in many cases, in addition the points and statements are nothing more that aspirations or proposals. Without more detail it is impossible to assess the full impact that this Code will deliver and how it will mitigate any nuisance.

Most importantly neither this document nor the Transport Assessment identifies the entrance and exit points for construction traffic and the routes that are proposed. This is essential to understanding the impacts of construction traffic on the local population. This detail needs to be submitted before construction commences.

Appendix L

My Ref: PA/07/218 and PA/07/345
Your Ref: 07/90012/OUMDA

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6 March 2007

Dear Madam

TOWN AND COUNTRY PLANNING ACT 1990

TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) (ENGLAND AND WALES) REGULATIONS 1999

TOWN AND COUNTRY PLANNING (GENERAL DEVELOPMENT PROCEDURE) ORDER 1995

Re: Planning Application to the Olympic Delivery Authority pursuant to ODA (Planning Functions) Order 2006

I write in reference to the above application and wish to submit the following observations. The London Borough of Tower Hamlets has considered the particular circumstance of this application against the Council's approved planning policies contained in the London Borough of Tower Hamlets Unitary Development Plan, associated supplementary planning guidance, the London Plan and Government Planning Policy Guidance and has found that:

Overall

- In principle, the London Borough of Tower Hamlets is supportive of the Olympics and Legacy Development Proposals. However, it is considered vital that more emphasis is placed on the establishment of legacy communities and connectivity with existing surrounding communities.
- It is recommended that further work be carried out on the design and layout of the site for legacy purposes in order to ensure that these communities are appropriately designed to achieve the long term sustainable regeneration of the area. This would involve the establishment of linkages with the surrounding area and the use of these linkages in perpetuity.

LOCAL GOVERNMENT ACT 2000 (Section 97) LIST OF BACKGROUND PAPERS USED IN THE DRAFTING OF THIS REPORT

Brief Description of background papers:	Tick if copy supplied for register	Name and telephone no. of holder:
Application, plans, adopted UDP. draft LDF and London Plan		Rachel Blackwell 020 7364 0436

- Inappropriate land bridge type connection back from the Greenway to the northwest of the railway line linking Tower Hamlets with the Olympic Park and Stratford Town Centre. Despite the construction of a major land bridge, uninterrupted pedestrian and cycle traffic along the entire Greenway will not be achieved.
- Currently the site is isolated by river and road networks. The lack of connectivity and safety concerns with the existing links is required to be addressed through improvements including bridges. The proposed bridges from the park to other parts of Fish Island and Bow are temporary with no firm commitment to make them permanent beyond the lifetime of the games. Without firm commitment for improved links, Tower Hamlets residents would be isolated from the facilities within the Olympic Park and at Stratford City.
- Generally, it is felt that the renewables and CO₂ emission reduction targets should be raised higher than 20%. This is to reflect future targets of Zero Carbon developments.
- Guarantees should be sought to ensure that the design and proposed operation (i.e. traffic, hours of operation and noise emissions) of the Energy Centre respect the future residential/ community focus of this part of Fish Island.
- An appropriate conditions and Section 106 (or other relevant legal agreement) package must be established to ensure that the various mitigation measures and commitment to the delivery of facilities and infrastructure during the games and in legacy are secured.

Major Concerns

Commitment to Sustainable Regeneration and Legacy Proposals

Whilst the provision of a loop road is necessary for the functioning of the Olympics, to show its virtual complete retention in Olympic Legacy in these applications is surprising to say the least.

The lack of any clear analysis of how the area should function in 2012+ in urban design terms is a fundamental weakness in these applications. To say that these details will follow in Legacy Communities is just not acceptable. If these planning permissions are granted in the form that they have been made, planning permission will exist for a network of roads that have been largely chosen because they suit the running of the Olympics from this location and not because they provide the necessary highway and servicing infrastructure to support the future development of these areas.

Addressing this shortcoming in the application will be challenging and difficult at this late stage. The only way to address this issue is for the application to be amended so that the legacy elements are submitted as illustrative at this stage, and will therefore need to be submitted in detail following a proper urban design analysis of the legacy provision.

The provision of the Olympics legacy framework of roads and bridges would be controlled through a Grampian condition linked to the first use of any of the retained facilities, such as the main stadium or the athletes' village. This would mean that the alteration of any permanent facility could not take place until the legacy proposals have been submitted and approved and the facility could not be first used until the approved legacy proposals have been provided.

Although it is understood and accepted that a loop road is needed for the Games, such a road is an anathema to good urban design in legacy and therefore more clarity is sought on this issue. Given that regeneration and a positive legacy are primary aims of the 2012 Games the lack of commitment and the potential negative legacy are major concerns. These concerns could be addressed by:

- Producing a rigorous urban design analysis of the form the legacy communities development should take in order to provide well connected and sustainable communities and then demonstrating how the Olympics phase either provides that platform or if it cannot, how that platform will be provided in Olympic Legacy.
- Revising the application to reflect the land use designations in the Leaside Area Action Plan and LLVOAPF.
- Ensuring bridges to Tower Hamlets are built as permanent features that improve connectivity between the Olympic Park and Fish Island.
- Either alter the location of the inner ring road or ensure that it is a temporary feature that is removed as part of the deconstruction process.

The Greenway

In order to provide the most benefit for pedestrians and cyclists accessing the Greenway from the western (Tower Hamlets) end, a solution should be designed that allows direct access to the land bridge on both the northwest and the southeast side of the railway.

Footbridges Linking LBTH to the Olympic Park/ Connectivity

In order to provide the best possible benefits to Tower Hamlets' residents, guarantees should be sought that:

- The construction of the permanent bridges is mandatory and cannot be withdrawn at a later stage. Planning permission for temporary structures should only be given on the condition that these are replaced with permanent structures after the Games.
- At no point will the established connection between the Olympic Park and the rest of Tower Hamlets be severed. Construction of permanent bridges should be scheduled so that there is always one of the two bridges available at all times.

Renewable Energy

Generally, it is felt that the renewables and CO₂ emission reduction targets should be raised higher than 20%. This is to reflect future targets of Zero Carbon developments. Given that the timeframe for the application goes beyond 2014, the likelihood for more stringent legislation is very high. Raising the targets would also send a clear message to all stakeholders and interested parties that the ODA is serious about making these Games the most sustainable in history.

Regulation 19

I refer to the Environmental Statement (ES) submitted with the planning application. I write to advise you that it is considered that further information is required in accordance with Regulation 19 of the Town and Country Planning (Environmental Impact Assessment) Regulations (1999). In summary, further information is required as follows:

- The Non Technical Summary is not consistently written up in terms of environmental effects of the application and does therefore not give an accurate overview.
- Overall, the objectives of sustainable development are central to the planning application. However it is felt that more ambitious targets should be adopted to give further assurances to the relevant authorities, local communities and other stakeholders that sustainable development is not only an ambition but can be achieved with the scope of this development.

- The Sustainable Development Strategy with its 12 Sustainability Objectives is welcomed. It is felt that some targets may enhance the ability to measure and monitor progress against these objective and commitments to these should be included within the Planning Application.
- The Environmental Impact Assessment suggests a number of mitigation measures to reduce significant environmental effects. It is recommended that most if not all of these are included as some form of condition when granting planning permission. It is not sufficient to state that the development should be carried out in accordance with the Environmental Impact Assessment. Individual conditions concerning mitigation measures must be listed.
- Effective monitoring agreements between the ODA and contractors need to be put in place to ensure that the mitigation measures set in place during construction as well as during operation and beyond are effective and are achieving what they set out to achieve.
- In terms of cumulative effects, the major developments as part of the London Thames Gateway have not been assessed. This is a major omission for this chapter of the Environmental Impact Assessment.

As you are aware, the Regulation 19 information will be required to be readvertised, in accordance with the EIA Regulations.

Other Issues

Open Space

- Guarantees should be sought that these areas designated as legacy communities will include sufficient open space to meet the standards set by the London Plan.
- The Legacy Master Plan should not only address the connectivity of green space and open space within the Area, but also links with green and open spaces outside of the boundary, especially with regards to Victoria Park to the west. Further work needs to be undertaken with regard to ownership, management and maintenance of the legacy park. This should be conditioned by the ODA.

Biodiversity/ Ecology

- In principle, the proposed works to the river walls are acceptable, however due to some species and habitat sensitivity appropriate mitigation measures need to be conditioned to ensure that minimum disruption is caused.
- The decontamination of the waterways is welcomed and should lead to an overall enhancement of the rivers and canals within the site. It is in the ODA's interest that potential offsite pollution sources are identified and an assessment is made on how these can be eliminated or at least mitigated against.

Making the Best Use of Waterways

- It is important to relate water freight access to places where future employment and industry will be located and to road access to allow for intermodal transfer, particularly for waste and recyclates. A number of piers and wharves should be designed and located throughout the site to provide connections to the construction sites for water freight.
- Sources supplying wood fuel for the Biomass Plant should, if possible, be adjacent to the waterway network and access onto the waterways should be identified or created to allow road sourced fuel to transfer to barge.

Waste

- Waste has not been addressed beyond construction. It should be condition that a Waste Management Plan is produced for the Phase during the Olympic and Paralympic Games, with the aim of reducing the amount of waste produced during the Games and of reusing and recycling.

Olympic and Legacy Travel Plan

The ODA should be conditioned to provide a contribution towards revenue support for officer time, from 2007 to at least 2014, with a review period in 2014 to identify contributions going forward to 2021, when management companies for venues and new residential and commercial land-uses will be required to manage and monitor their individual travel plans.

Transport

- It is recommended that the London Plan parking standards be applied, this is especially important in the legacy proposals given that there is an excessive amount of parking proposed, the public transport accessibility of the area would be 'excellent'. The legacy would be implemented some 5 – 10 years from now where it is expected that use of private vehicles would be significantly lower.
- More generous cycle parking should be provided in line with London Plan cycle parking policies both during the Olympics and legacy.
- Insufficient detail has been provided in order to assess the impacts of construction traffic (particularly deliveries to the site) as the vehicle entry and exit points have not been identified.
- In general, further work needs to be carried out with regard to the impact of construction traffic and long term highway implications, i.e. during the Olympics and legacy on both Strategic Roads and the London Borough of Tower Hamlets road network.

Retail, Leisure and Sport

An appropriate strategy should be developed to ensure that sporting facilities provided in legacy reflect the need of local communities and wider London residents and that the funding mechanisms are in place to secure these facilities for long term community use.

Code of Construction Practise

The London Borough of Tower Hamlets would expect full compliance with the Council's Code of Construction Code of Practise.

For a complete commentary of the London Borough of Tower Hamlets, issues and views please refer to the attached report presented to the Strategic Development Committee on the 15th March 2007 and subsequently minutes of the meeting.

Should you have any further queries in relation to this matter, please contact Rachel Blackwell on 020 7364 0436.

Yours faithfully,

Michael Kiely
Head of Development Decisions

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Agenda Item 6.2

Committee: Strategic Development	Date: 15 th March 2007	Classification: Unrestricted	Agenda Item No: 6.2
Report of: Corporate Director of Development and Renewal		Title: Planning Application for Decision	
Case Officer: Rachel Blackwell		Ref No: PA/06/01992	
		Wards: Mile End East	

1. APPLICATION DETAILS

Location:	48-52 Thomas Road, London E14 7BJ
Existing Use:	The site is currently vacant. (Formally used as an open yard, recycling plant facilities and warehousing).
Proposal:	Redevelopment to provide a mixed use development within 3 buildings ranging from 5 to 12 storeys (including a mezzanine level at the top floor), 182 residential units, of which 91 will be affordable dwellings, 750 sqm of B1 floor space, 91 underground car parking spaces, 182 cycle spaces, landscaping and ancillary works.
Drawing Nos:	06074/100 Sept 06, 06074/209 Nov 2006, 06074/SK91 Sept 06, 06074/SK92 Sept 06, 06074/SK93 Sept 06, 06074/SK94 Sept 06, 06074/SK95 Sept 06, 06074/SK96 Sept 06, 06074/SK97 Sept 06, 06074/SK98 Sept 06, 06074/SK99 Sept 06, 06074/SK100 Sept 06, 06074/SK103 Sept 06, 06074/230 Sept 06, 06074/231 Sept 06, 06074/232 Sept 06, 06074/233 Sept 06, 06074/234 Sept 06, 06074/235 Sept 06, 06074/251 Sept 06, 06074/252 Sept 06, 06074/253 Sept 06, 06074/261 Oct 06, 06074/262 Oct 06, 06074/265 Oct 06, 06074/266 Oct 06, 06074/270 Oct 06, 06074/271 Oct 06, 06074/280 Oct 06, 06074/281 Oct 06, 06074/282 Oct 06, 06074/283 Oct 06, 06074/284 Oct 06, 06074/285 Oct 06, Planning Statement – Hepher Dixon Design & Access Statement – Child Graddon Lewis Sustainability Statement – RYBKA Transport Assessment – Paul Mew Associates Air Quality impact Assessment – Environs Wind/Microclimate Assessment – RYBKA Energy Strategy – RYBKA Ecohomes Pre Assessment Report - RYBKA TV and Radio Reception Report – Tom Paxton Geoenvironmental Conditions Survey – Southern Testing Code of Construction Practice – Durkan Socio Economic Impact Assessment – Hepher Dixon Ecology Report – Thompson Ecology Unexploded Ordinance Report – RPS Sunlight/Daylight Report – Gordon Ingram Associates Bat Survey – Thomson Ecology
Applicant:	Genesis Housing Group C/- Hepher Dixon
Owner:	ASDA Properties
Historic Building:	N/A
Conservation Area:	N/A

LOCAL GOVERNMENT ACT 2000 (Section 97) LIST OF BACKGROUND PAPERS USED IN THE DRAFTING OF THIS REPORT

Brief Description of background papers:	Tick if copy supplied for register	Name and telephone no. of holder:
Application, plans, adopted UDP. draft LDF and London Plan		Rachel Blackwell 020 7364 0436

2. SUMMARY OF MATERIAL PLANNING CONSIDERATIONS

2.1 The local planning authority has considered the particular circumstance of this application against the Council's approved planning policies contained in the London Borough of Tower Hamlets Unitary Development Plan, associated supplementary planning guidance, the London Plan and Government Planning Policy Guidance and has found that:

- a) In principle the redevelopment of the site to provide 182 units is acceptable, subject to an appropriate planning obligations agreement and conditions to mitigate against the impact of the development and minimise any adverse impact to future occupiers of the development; and,
- b) It is considered that the redevelopment of the site for 182 units would not have an adverse impact upon the amenity of surrounding properties. A number of conditions are recommended to secure submission of details of material, landscaping, external lighting, sound insulation and to control noise and hours of construction.

3.0 RECOMMENDATION

3.1 That the committee resolve to **GRANT** planning permission subject to:

- A. The prior completion of a **Legal Agreement** to the satisfaction of the Chief Legal Officer, to secure the following:
 - a) Affordable Housing provision of 50% of the proposed residential units measured by habitable rooms with an 80/20 split between rented/shared ownership in accordance with the mix specified in this committee report.
 - b) A contribution of **£763,755** towards healthcare to mitigate the demand of the additional population on healthcare services.
 - c) A contribution of **£345,576** towards education to mitigate the demand of additional school places generated by the proposal.
 - d) A contribution of **£100,000** towards access to employment initiatives.
 - e) A contribution of **£150,000** towards highways, pedestrian & cycle improvements within the surrounding area and the funding of a study to investigate improved linkages in the wider area.
 - f) A contribution to TfL of **£20,000** towards improving bus accessibility and bus stop upgrades in the surrounding area.
 - g) Completion of a car free agreement to restrict occupants applying for residential parking permits.
 - h) Preparation of a Travel Plan (for both the residential and commercial component).
 - i) A contribution of **£10,000** towards improvements to the riverside walkways and access to the canal to be implemented by British Waterways. This would equate to approximately 25% of the current estimated cost of canalside works in the vicinity of the site.
 - j) Code of Construction Practice
 - k) TV and Radio Reception
- B. An agreement under Section 278 of the Highways Act for highways, pedestrian & cycle improvements within the surrounding area.

3.2 That the Head of Development Decisions be delegated power to impose conditions and informatives on the planning permission to secure the following:

Conditions

- 1) Permission valid for 3 years;
- 2) Submission of samples / details / full particulars;
- 3) Submission of a Secured by Design Statement;
- 4) This scheme shall include an unobstructed access strip of at least six metres between the new development and the canal wall;
- 5) Submission of a Landscaping scheme and landscape management plan, including the provision of landscaping within 6m buffer zone to the Limehouse Cut;
- 6) Submission of investigation to assess the degree of contamination of the site and determine water pollution potential;
- 7) Submission of details of site drainage;
- 8) No soakaways shall be constructed in contaminated ground;
- 9) Submission of details of site foundations;
- 10) Submission of an Investigation and remediation measures for land contamination;
- 11) Submission of a Noise and Vibration Survey and details of sound insulation/attenuation measures to ensure minimal impact during construction to surrounding properties and to protect future residents from surrounding industrial impacts.
- 12) Provision of a minimum of 214 cycle spaces;
- 13) Submission of a traffic management plan detailing all routes to be used by construction vehicles and maintenance programmes;
- 14) Parking, access and loading/unloading, manoeuvring;
- 15) No parking on site, other than in the basement car park;
- 16) Vehicular access;
- 17) Refuse and recycling facilities;
- 18) Hours of Construction (8.00am to 6.00pm Monday to Friday 9.00am to 5.00pm on Saturdays. You must not carry out the required building works on Bank Holidays.)
- 19) Power/hammer driven piling/breaking (10am – 4pm Monday – Friday);
- 20) Submission of full details of the proposed lighting and CCTV scheme;
- 21) Submission of a survey of the condition of the waterway wall, and a method statement and schedule of the repairs identified;
- 22) Submission of a Risk Assessment and Method Statement outlining all works to be carried out adjacent to the water;
- 23) Implementation of the mitigation measures detailed in the Bat Survey.
- 24) Any other condition(s) considered necessary by the Head of Development Decisions;
- 25) Lifetime Homes;
- 26) 10% Disabled Access; and
- 27) Renewable Energy Measures (at least 10% reduction in carbon dioxide emissions).

Informatives

- 1) Section 106 of the Town and Country Planning Act 1990.
- 2) Locally native plant species only, of UK genetic origin.
- 3) During construction no solid matter shall be stored within 10 metres of the banks of the Limehouse Cut.
- 4) No lightspill onto the Limehouse Cut.
- 5) Adequate sewerage infrastructure in place
- 6) With regard to (Decontamination), contact Council's Environmental Health Department.
- 7) Code of Construction Practice, discuss this with Council's Environmental Health Department.
- 8) Consult with the Councils Highways Development Department regarding any alterations to the public highway.
- 9) During construction consideration must be made to other developments within the area and the impact to traffic movements on Bow Common Lane
- 10) Any discharge of surface water into the waterways requires British Waterway's written permission before development commences.
- 11) In the event of any balcony overhangs or other encroachments into British Waterway's

- airspace, land or water, enter into an appropriate agreement with British Waterways
- 12) Contact British Waterways engineer, "Code of Practice for Works affecting British Waterways."
 - 13) Contact the GLA regarding the energy proposals.

- 3.3 That if by the 15th September 2007 the legal agreement has not been completed to the satisfaction of the Chief Legal Officer; the Head of Development Decisions be delegated power to refuse planning permission.

4. PROPOSAL AND LOCATION DETAILS

Proposal

- 4.1 An application has been made for full planning permission to redevelop land located at 48-52 Thomas Road, E3 for the construction of 182 residential units. The buildings would comprise three separate blocks with a multi storey form rising up to 12 storeys in height at the corner of Bow Common Lane and the Limehouse Cut (canal). The development also proposes 750m² of ground floor B1 commercial space provided at the Bow Common Lane frontage.

- 4.2 Of the 182 units proposed a total of 91 would be affordable and 91 for private sale. This would equate to 51% affordable housing provision calculated on a habitable room basis. In total, there would be 43 one bedroom units, 102 two bedroom units, 30 three bedroom units, 5 four bedroom units and 2 five bedroom units.

Site and Surroundings

- 4.3 The application site comprises land at 48-52 Thomas Road, Bow. The site has an overall area of 0.61ha and is bounded by Thomas Road to the north, Bow Common Lane to the east and the Limehouse Cut to the south.
- 4.4 The site contains a collection of buildings that have been developed over time and therefore the building, heights, styles, etc, vary across the site. The warehouse uses on the site ceased in 2005/06 and the buildings are currently vacant.
- 4.5 Located directly opposite to the site to the north of Thomas Road is residential development containing a block of flats rising to 3 storeys in form. To the east of the site on the opposite side of Bow Common Lane and to the west of the site on Thomas Road are commercial uses containing class B1, B2 and B8 uses. Directly to the south of the site is the Limehouse Cut a canal which forms part of the Lea Valley Regional Park and Blue Ribbon Network. Beyond the canal to the south is Cottal Street and Bartlett Park, which currently contains a block of flats.
- 4.6 The site has a public transport accessibility level of 2 (where 6b is the highest). Devons Road DLR Station is located approximately 700 metres to the north east of the site and Westferry DLR Station is located approximately 800 metres to the south. Bow Road Underground Station (Hammersmith & City and District Lines) is located approximately 1.16 kilometres to the north and can be reached in about 20 minutes by foot. There is a bus stop located on Bow Common Lane, which operates the 309 bus service (London Chest Hospital to Canning Town). Other bus services also operate from St Pauls Way and Burdett Road.

Planning History

- 4.7 The following planning decisions are relevant to the application:

PA/06/1537 (48-50)	Full planning permission was granted on the 13 th October 2006 for a change of use from business (class B1) to storage and distribution (class B8) and additional internal mezzanine floor.
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- PA/03/1381 (48-50 unit 3/4) Full planning permission was granted on the 9th March 2004 in accordance with condition 5 of the councils planning permission of the 2nd May 1980 for the change of use from B1 (business) to B8 (Storage and distribution) with ancillary trade counter and business use.
- TH/1826/P495/0051 (unit 5) Existing use as a book packing plant deemed lawful on the 11th August 1995.
- PA/89/120 (48-50 unit 6/7) Planning permission was granted on the 27th March 1990 for a change of use to storage and distribution within classes B8 (units 6 and 7).
- TP/14164 (48-50) Planning permission was granted on 4th June 1982 for a change of use to a cash and carry textile warehouse.
- TH11826/1370 (unit B 48-50) Planning permission was granted on 20th November 1981 for external alterations to allow for additional internal office accommodation.
- TP/13701 (48-50) Planning permission was granted on the 20th November 1980 for external alterations to allow for additional internal office accommodation (unit B).
- TP/11811 (48-50) Planning permission was granted on 2nd may 1980 for the erection of 15 industrial and warehouse units and alteration to the elevation of existing warehouse unit A.
- TP/10517 (48-50) Planning permission was granted on the 16th May 1979 for the erection of 40,000sqft single storey building for the storage and parking of toys and books and construction of 28000sqft of industrial floor space/small units.
- TP/10082 (48-50) Planning Permission was refused on the 18th October 1978 for the construction of 75000sqft of single storey warehousing with ancillary parking and loading.

5. POLICY FRAMEWORK

- 5.1 For details of the status of relevant policies see the front sheet for “Planning Applications for Decision” agenda items. The following policies are relevant to the application:

Unitary Development Plan

Proposals:		Industrial Employment Areas Green Chain Lea Valley Regional Park
Policies:	DEV1 DEV2 DEV3 DEV4 DEV6 DEV12 DEV13 DEV46 DEV48 DEV50 DEV51 DEV55 DEV56 DEV69	Design Requirements Environmental Requirements Mixed Use Developments Planning Obligations High Buildings Outside the Central Area & Business Core Provision of Landscaping in Development Design of Landscape Scheme Protection of Waterway Corridors Strategic Riverside Walkways and New Development Noise Soil Tests Development & Waste Disposal Waste Recycling Efficient Use of Water

EMP2	Retaining Existing Employment Uses
EMP8	Encouraging Small Business Growth
HSG2	Provision for Housing Development
HSG3	Affordable Housing
HSG7	Dwelling Mix & Type
HSG8	Mobility Housing
HSG9	Density of New Housing Development
HSG13	Standard of Dwelling
HSG16	Housing Amenity Space
T15	Location of New Development
T17	Planning Standards (Parking)
T21	Pedestrian Needs in New Development
T24	Cyclists Needs in New Development
OS9	Children's Play Space
OS14	Lea Valley Regional Park

Emerging Local Development Framework

Proposals:	CP34	Development Sites
	CP34	Green Chain
	CP35	Lea Valley Regional Park
	CP36	Blue Ribbon Network
	CP43	Proposed Cycle Route – Thomas Road

Core Strategies:	IMP1	Planning Obligations
	CP1	Creating Sustainable Communities
	CP2	Equal Opportunity
	CP3	Sustainable Environment
	CP4	Good Design
	CP5	Supporting Infrastructure
	CP9	Employment Space for Small Businesses
	CP19	New Housing Provision
	CP20	Sustainable Residential Density
	CP21	Dwelling Mix & Type
	CP22	Affordable Housing
	CP25	Housing Amenity Space
	CP35	Lea Valley Regional Park
	CP36	The Water Environment & Waterside Walkways
	CP38	Energy Efficiency and Production of Renewable Energy
	CP39	Sustainable Waste Management
	CP40	A Sustainable Transport Network
	CP41	Integrating Development with Transport
	CP42	Streets for People
	CP46	Accessible and Inclusive Environments
	CP47	Community Safety
	CP48	Tall Buildings

Policies:	DEV1	Amenity
	DEV2	Character & Design
	DEV3	Accessibility & Inclusive Design
	DEV4	Safety & Security
	DEV5	Sustainable Design
	DEV6	Energy Efficiency & Renewable Energy
	DEV7	Water Quality and Conservation
	DEV8	Sustainable Drainage
	DEV9	Sustainable Construction Materials
	DEV10	Disturbance from Noise Pollution
	DEV11	Air Pollution and Air Quality

DEV12	Management of Demolition and Construction
DEV13	Landscaping and Tree Preservation
DEV15	Waste and Recyclables Storage
DEV16	Walking & Cycling Routes & Facilities
DEV17	Transport Assessments
DEV18	Travel Plans
DEV19	Parking for Motor Vehicles
DEV20	Capacity of Utility Infrastructure
DEV22	Contaminated Land
DEV27	Tall Buildings Assessment
EE2	Redevelopment/Change of Use of Employment Sites
HSG1	Determining Residential Density
HSG2	Housing Mix
HSG3	Affordable Housing Provisions in Individual Private Residential and Mixed-use Schemes
HSG4	Varying the Ratio of Social Rented to Intermediate Housing
HSG7	Housing Amenity Space
HSG9	Accessible and Adaptable Homes
HSG10	Calculating Provision of Affordable Housing
OSN3	Blue Ribbon Network & the Thames Policy Area

Planning Standards

- Planning Standard 1: Noise
- Planning Standard 2: Residential Waste Refuse and Recycling Provision
- Planning Standard 3: Tower Hamlets Density Matrix
- Planning Standard 4: Lifetime Homes

Supplementary Planning Guidance/Documents

- Designing Out Crime
- Sound Insulation
- Residential Space
- Landscape Requirements
- Canalside Development

Spatial Development Strategy for Greater London (London Plan)

- Policy 3A.7 Affordable Housing Targets
- Policy 3A.8 Negotiating Affordable Housing in Individual Private Residential and Mixed Use Schemes
- Policy 3C.2 Matching Development to Transport Capacity
- Policy 2C.24 Freight Strategy
- Policy 4A.6 Improving Air Quality
- Policy 4A.7 Energy Efficiency and Renewable Energy
- Policy 4A.8 Energy Assessment
- Policy 4A.9 Providing for Renewable Energy
- Policy 4A.10 Supporting the Provision of Renewable Energy
- Policy 4A.11 Water supplies
- Policy 4A.14 Reducing Noise
- Policy 4B.1 Design Principles for a compact city
- Policy 4B.2 Promoting world class architecture and design
- Policy 4B.3 Maximising the potential of sites
- Policy 4B.4 Enhancing the Quality of the Public realm
- Policy 4B.5 Creating an inclusive environment
- Policy 4B.6 Sustainable Design and construction
- Policy 4B.7 Respect Local context and communities
- Policy 4B.8 Tall buildings, location
- Policy 4B9 Large scale buildings, design and impact
- Policy 4C.1 The strategic importance of the blue ribbon network

- Policy 4C.2 Context for sustainable growth
- Policy 4C.3 The natural value of the blue ribbon network
- Policy 4C.8 Sustainable Drainage
- Policy 4C.12 Sustainable growth priorities for the blue ribbon network
- Policy 4C.14 Freight uses on the blue ribbon network
- Policy 4C.17 Increasing access alongside and to the blue ribbon network
- Policy 4C.20 Design Starting from the water
- Policy 4C.28 Development Adjacent to Canals

Government Planning Policy Guidance/Statements

- PPG1 Generally Policy and Principles
- PPG3 Housing
- PPG13 Transport
- PPG24 Planning & Noise
- PPS1 Delivering Sustainable Development
- PPS22 Renewable Energy

Community Plan The following Community Plan objectives relate to the application:

- A better place for living safely
- A better place for living well
- A better place for creating and sharing prosperity
- A better place for learning, achievement and leisure
- A better place for excellent public services

6. CONSULTATION RESPONSE

- 6.1 The views of officers within the Directorate of Development and Renewal are expressed in the MATERIAL PLANNING CONSIDERATIONS section below. The following were consulted regarding the application:

LBTH Housing

- 6.2 The provision of affordable housing exceeds the minimum policy requirement for 35% affordable housing, meeting the target of 50%.

Within the affordable housing, the scheme proposes 63% social rent, and 37% intermediate (as shared ownership), and thus exceeds the targets set within the LDF.

The scheme complies with the LDF requirements on unit mix in relation to the affordable housing for social rent, providing 45% family units, and including 4 and 5 beds in the mix. The mix for the private and intermediate housing provides between 10% and 11% 3 beds, against a target of 25% in the emerging LDF.

The affordable housing is fully integrated within the scheme; larger units are on the ground floor with separate entrances, with smaller units on the higher floors.

All of the units have private balconies or terraces.

It is recommended that a condition be included to ensure that the units meet lifetime homes standards and 10% of the units are wheelchair accessible or easily adaptable for residents who are wheelchair users.

LBTH Education Development

- 6.3 This mix of units will generate a need for 28 additional primary school places @ £12,342 = £345,576. The funding would be pooled with other contributions and other funding to

provide additional school places to meet the rising need in the Borough as a whole. This sum is sought at 100%.

LBTH Corporate Access Officer

6.4 No reply received.

LBTH Energy Efficiency Unit

6.5 No reply received.

LBTH Highways Development

6.6 This development is acceptable. Approval should only be granted the provision of a car free agreement for the site and pedestrian improvements.

Section 278 Requirements

Consideration must be given to the footways surrounding the site, due to large scale construction and the likely effects it will have on the road surface along Bow Common Lane and Thomas Road. The bridge on Bow Common Lane must also be included in any S278 contributions and consultation with the Council's structural engineers must be sought and given approval prior to construction.

Section 106 Requirements

The developer should enter into a car free agreement.

The development should contribute to wider pedestrian enhancement and improvement works from St Paul's Way School to Mayflower Primary and St Mary and St Joseph's Primary School. This contribution should be shared between this development and the development opposite known as 8-10 Bow Common Lane.

There is also a need to simplify and redesign the junction with Bow Common Lane and Devons Road to the North of the developments. This junction gets very congested because of right turning traffic, plus there is a need to facilitate better and safer crossing to St Pauls Way School. All the developments in this area will impact both on the pedestrian flows and the vehicle movements at this junction.

Therefore, £150,000 is sought as contributions to the Bow Common Lane/Upper North Street Corridor Improvements. This would include the funding of a study to investigate improved linkages in the wider area. The works envisaged will upgrade this corridor, improving safety, pedestrian facilities, road layout, pedestrian crossing and vehicular movements, all of which will be exacerbated by the developments that will be completed in this area. This will be of significant benefit to the developments in this area.

LBTH Environmental Health

6.7 Air Quality

The following conditions must be complied with:

- A traffic management plan must be submitted detailing all routes to be used by construction vehicles. The plan must also detail any vehicle maintenance programmes to be employed.
- All on and off-road vehicles must comply with the applicable European Emission Standards at the time construction begins.

Bonfires

- No bonfires shall be lit on the construction site.

Smoke Emission

- All vehicles and plant must be maintained so as to not emit black smoke
- No plant must be operated on site which emits black smoke.

Contaminated Land

No reply received.

(OFFICER COMMENT: Standard conditions can be applied in this instance.)

Noise

The proposed development is expected to be exposed to road traffic noise levels falling into Noise Exposure Category "B" of PPG 24. It is recommended that consideration should be given to change of layout, to place habitable rooms on quieter facades. Where this is not possible, windows giving higher sound insulation than normal single glazing should be fitted to habitable rooms, along with sound attenuating ventilators.

LBTH Sun/Daylight Officer

No objections.

LBTH Cleansing Officer

6.8 No reply received.

LBTH Horticulture & Recreation

6.9 No reply received.

London City Airport

6.10 No safeguarding objection.

Tower Hamlets PCT

6.11 Based on 2 years revenue contribution, calculates that the proposal would generate a requirement in revenue and capital contributions respectively of £763,755 + £164,150 = £927,905.

Metropolitan Police

6.12 No objections to the proposal. Recommendations made regarding improvements to safety and security within the development. These issues can be dealt with via a suitable management plan.

British Waterways (Statutory Consultee)

6.13 BW raises no objection to the proposed development subject to a legal agreement and suitable conditions.

Since the development would bring more people to the area, thus putting more pressure on local open spaces, including the canal and its towpath, it is considered that this scheme and other proposed developments in the area present opportunities for funding local canal side environmental improvements to enhance the attractiveness and capacity of the canal infrastructure.

(OFFICER COMMENT: It has been agreed that the developer contribute £10,000 to British Waterways to secure works to Bow Common Bridge, access improvements to the tow path and upgrade works. This is approximately 25% of the current estimated cost of canalside

works in the vicinity of the site).

Environment Agency (Statutory Consultee)

- 6.14 No objection to the application subject to a number of conditions relating to maintenance of the canal wall, drainage and sewerage, flood defences, landscaping, lighting, and contamination. The Environment Agency request that they are consulted on the details submitted in relation to the above conditions.

Lea Valley Regional Park Authority (Statutory Consultee)

- 6.15 No reply received.

Greater London Authority (Statutory Consultee)

- 6.16 In summary the GLA concluded that:
- The permanent net loss of employment land on this historically industrial site raises some UDP policy concern and the provision of a greater amount of employment space would have offered a better balance of land uses for a genuine mixed-use development. However, the Council's UDP is dated; there is no indication in the emerging development framework that the area would be allocated solely for employment uses, and perhaps even more significantly, it is not identified as a strategic employment location in the London Plan.
 - For a location with good to moderate public transport accessibility, the site has evidently been underused both in terms of the existing quantum of development and the amount of employment it generated even before it became vacant. The submitted proposal would replace the old poor quality and dilapidated employment space with modern, albeit significantly less, business accommodation which is more likely to be let and to generate a significantly higher employment density on the site than would otherwise be the case.
 - The scheme has the additional and important benefit of delivering a high density residential accommodation that would maximise the development potential of the site, secure an affordable housing provision exceeding the London Plan 50% target for the local area, with an appropriate mix of tenures and unit sizes, and deliver a landmark development that provides a satisfactory design solution to the prominent junction of Thomas Road and Bow Common Lane and set the tone for the regeneration of this declining locality.

7. LOCAL REPRESENTATION

- 7.1 A total of 192 neighbouring properties within the area shown on the map appended to this report were notified of the application and invited to comment. The application has also been publicised in East End Life and on site. The number of representations received from neighbours and local groups in response to notification and publicity of the application were as follows:

Consultation

No of individual responses: 2 Objecting: 2 Supporting: 0
No of petitions received: 0

- 7.2 The following issues were raised in representations that are material to the determination of the application, and they are addressed in the next section of this report:

Objecting

Impact to surrounding businesses

- Adjoining printing company is concerned about damage during demolition and construction in terms of vibration, which may upset the balance of printing presses resulting in damage to this business.
- The rear of the adjoining building will be open to the public during demolition and construction on the subject site and security of the business may be compromised during this period.

Traffic & Car Parking

- Disruption to the traffic flow during demolition and construction may have the potential to impact upon local businesses.
- The proposed development would increase the amount of traffic in the area, resulting in traffic problems at the junction of Bow Common Lane and St Pauls Way.
- The proposed development does not accommodate enough car parking given that the road network in the surrounding area can only accommodate minimal car parking.

Amenity

- The proposal would result in loss of sun/daylight to surrounding residential properties.
- The proposed development will interfere with TV/radio and satellite reception. Other buildings approved and constructed in the past in the area have impacted upon the reception of surrounding residents.

Other

- Low rise flats are more appropriate for this site.

8. MATERIAL PLANNING CONSIDERATIONS

8.1 The main planning issues raised by the application that the Committee must consider are:

1. Land Use
2. Density
3. Design and layout and the suitability of a tall building at this location
4. Affordable housing, dwelling mix and housing standards
5. The Blue Ribbon Network
6. Energy Efficiency
7. Transport and Parking
8. Associated amenity impacts to surrounding properties

Land Use

8.2 The subject site and the surrounding area are nominated as an employment area in the UDP proposals map (1998). Land use within the area is presently evolving and the site and surrounds have been designated in the Local Development Framework Core Strategy and Development Control Submission Document as a suitable location for mixed use development. In essence the proposed development comprising both residential and B1 use is contrary to the adopted UDP (1998) yet is consistent with the emerging LDF, thereby reflecting the evolution of the area.

8.3 The site presently contains a number of buildings/warehouses which are vacant. The scheme proposes 750m² of B1 floor space at ground level. The provision of commercial floor space at the Bow Common Lane frontage of the site will make a positive contribution to the vibrancy and character of this frontage which presently exhibits minimal activity.

8.4 The applicant advised that when the previous businesses were operating on the site less than 15 people were employed. Based on the floor area proposed it is considered that the scheme would have the potential to provide B1 office/workspace for a greater number of persons (in the vicinity of 40 persons), than the previous uses, well above the current level of employment generated on the site. The commercial floor space has been designed to be

suitable to the needs of modern businesses. In order to complement and ensure compliance with Policy EMP2 of the UDP (1998). In addition, should the development be supported it is recommended that planning contributions be sought for employment and training initiatives for local people as well as physical and social infrastructure.

Residential Density

- 8.5 UDP policy HSG9 which refers to a density of 247hrh has largely been superseded by the density policies of the London Plan 2004 and Policies of the Local Development Framework – Core Strategy and Development Control Submission Document. Core policy CP20 of the Local Development Framework states that Council will seek to maximise residential densities, taking into account the individual relative merits of sites and their purposes. The London Plan and LDF policy HSG1 include the implementation of a density, location and parking matrix, which links density to public transport availability as defined by PTAL (Public Transport Accessibility Level) scores which are measured on a scale of 1 (low) – 6 (high).
- 8.6 The site has a public transport accessibility level (PTAL) of 3. For urban sites with a PTAL range of 1 to 3 the appropriate density of 200-450 hrh. The proposed density of 900hrh exceeds the greater level of the density range, however the scheme is acceptable based on the following grounds:
- The development of the site for mixed use development is consistent with emerging policy and will assist in the regeneration of this area. Development within this area will enhance the appearance and character of the area and will promote investment in infrastructure and services in the long term which will benefit both existing and future residents.
 - A number of contributions towards health, education and public infrastructure have been agreed to mitigate any potential impacts on local services and infrastructure.
 - The development is located within an area with reasonable access to public transport services, open space and other local facilities. The site is located within walking distance of several DLR stations, (Devon's Road, Westferry and All Saints). The proposed Langdon Park DLR station (within 500m of the site) will further improve the PTAL of the site. Bus services also operate on Bow Common Lane. The site also has good cycle pedestrian linkages along the Limehouse Cut.
 - The proposal does not result in any of the common symptoms of overdevelopment, i.e., inappropriate height, bulk and massing, excessive site coverage, undersized flats and open space, or significant amenity impacts to surrounding properties, etc.
 - The proposal is of a high quality and complies with the Council's objectives for new development as outlined in the UDP and the Local Development Framework– Core Strategy and Development Control Submission Document.

Design & Layout and Suitability of a Tall Building at this Location

- 8.7 The proposal is designed to the highest design quality standards and generally accords with policies DEV6 of the UDP (1998) and Policy DEV27 of the Local Development Framework – Core Strategy and Development Control Submission Document in relation to tall buildings.
- 8.8 In addition to tall building policies, the proposal also generally accords with the design and environmental Policies DEV1 and DEV2 of the 1998 UDP and Policy DEV2 of the Local Development Framework – Core Strategy and Development Control Submission Document, which requires the bulk, height and density of development to positively relate to surrounding building plots and blocks, and the scale of development in the surrounding area.
- 8.9 Furthermore the proposal provides a positive response to the general scale and character of the canal environs as required by policy DEV47 of the UDP (1998) and OSN3 of the Local Development Framework – Core Strategy and Development Control Submission Document.

Site layout

- 8.10 The surrounding urban form is presently industrial in nature with residential development to the north. Buildings in the area range in height from 5-6 storeys, with 9-13 storey residential building to the west adjacent to the canal at Abbots Wharf.
- 8.11 A 5-6 storey form rising up in height to 12 storeys is proposed. The tall 12 storey element has been incorporated into the design given the site's prominent junction at a bridge crossing over the Limehouse Cut and adjacent to Bartlett Park, an area of open space.
- 8.12 Blocks A and D are designed to align with both Bow Common Lane and Thomas Road frontages. The building is further setback at the canal side to provide an open space linkage from which to access Bow Common Lane and the bridge which traverses the Limehouse Cut. Block A/D has been set back at the 5th floor level to allow for an improved relationship with Bow Common Lane.
- 8.13 A feature of block A is the cantilevered building line with walkway feature underneath adjacent to the canal. In accordance with British Waterways and Environment Agency requirements the development is setback 6 metres from the canal edge.
- 8.14 Block B fronts the canal. The setback between blocks A/D and B is utilised as an open space linkage between the core of the development, the canal edge and Bow Common Bridge. Changes in level at this location have been dealt with via the provision of ramped access.
- 8.15 The canal side walkways would be landscaped in accordance with the landscape plan details of which would be agreed as a condition of approval.
- 8.16 Block C containing larger family units would be located central to the Thomas Road frontage and is afforded access to the landscape courtyard accommodating amenity and play space.
- 8.17 It is considered that the design and layout of the scheme as discussed above seeks to provide appropriate linkages from the surrounding pedestrian network through the site to the central and canal side communal open space on the site and Bow Common Bridge to the south and surrounding community spaces at Bartlett Park. In addition the proposed commercial component will seek to provide an active frontage to Bow Common Lane which will greatly improve the interface of development with the road frontage whilst also promoting safety and security at this location.

Building height, form & materials

- 8.18 The surrounding context is generally industrial in nature with surrounding residential development ranging in heights of up to 13 storeys. As discussed above Block A/D on Bow Common Lane has been set back at the 5th floor to provide an improved relationship with the width of Bow Common Lane whilst also seeking to maintain the characteristics of surrounding development to the north.
- 8.19 The tallest element of the scheme which is 12 storeys in height seeks to provide a landmark at this prominent junction of the bridge crossing over the Limehouse Cut. The diagonal orientation of this element seeks to address the relationship of the building to the canal side setting the adjacent parkland to the south.
- 8.20 The tall element is continued through to ground level and steps down to 6 storeys along the remainder of the canal frontage and at Bow Common Lane thereby providing a positive relationship to both of these frontages.
- 8.21 The design of the tower element is slim line incorporating the use of light reflective glazed and opaque panels. It is recommended that additional information be submitted as a condition of approval regarding the architectural treatments of all elevations including

materials and finishes to ensure that all elevations are appropriately articulated to ensure a high quality finish.

Amenity space

- 8.22 All residential units within the development would have direct access to private amenity space. The development also incorporates communal open space in terms of landscaped gardens, incorporating children's play space as well as roof gardens to all blocks.
- 8.23 In addition the site is located adjacent to the Limehouse Cut which provides an open space linkage in terms of the Blue Ribbon Network and Lea Valley Regional Park. Bartlett Park and Furze Green open space areas are also located in proximity to the site.
- 8.24 All residential units within the development achieve or exceed the Council's space standards. The distance between habitable room windows exceeds the Council minimum standard of 18 metres.

Accessibility & Inclusive Design – Safety & Security

- 8.25 UDP policies DEV1 and 2 and policy DEV 3 of the Local Development Framework – Core Strategy and Development Control Submission Document seeks to ensure that development incorporates inclusive design principles and can be safely, comfortably and easily accessed and used by as many people as possible. It is considered that the design and layout of public and private spaces within the development are inclusively designed resulting in improved permeability and connectivity and a high standard of amenity for future occupants.
- 8.26 Further UDP Policies DEV1 and 2 and Policy DEV 4 of the Local Development Framework – Core Strategy and Development Control Submission Document seek to ensure that safety and security within development and the surrounding public realm are optimised through good design and the promotion of inclusive environments.
- 8.27 The commercial component of the development is oriented to Bow Common Lane providing for an active frontage. The entries to the residential component of the development and individual units are provided off the central courtyard areas and would be visually identifiable and accessible promoting a high standard of amenity for future occupants.
- 8.28 The layout of the site and the through linkages proposed results in good accessibility and inclusive design which would lead to a high quality environment for future occupants.
- 8.29 Overall it is considered that the proposal represents a design, massing and scale which achieves a positive response to the sites context, including its relationship with the Limehouse Cut, Bow Common Lane, Thomas Road, and existing and emerging development in the surrounding area.

Housing

Affordable Housing

- 8.30 Adopted UDP Policy HSG3 seeks an affordable housing provision on sites capable of providing 15 or more units in accordance with the Plan's strategic target of 25%. Policy 3A.8 of the London Plan states that borough's should seek the maximum reasonable amount of affordable housing taking into account the Mayor's strategic target that 50% of all new housing in London should be affordable and in line with the Borough's own affordable housing targets.
- 8.31 The Local Development Framework – Core Strategy and Development Control Submission Document Policy CP22 seeks 50% affordable housing provision from all sources across the Borough with a minimum of 35% affordable housing provision on sites capable of providing

10 or more dwellings. Policy HSG10 confirms that affordable housing will be calculated in terms of habitable rooms with the exception of where this yields a disparity of 5% or more compared to calculation in terms of gross floor space.

- 8.32 The application provides 91 affordable housing units out of the total 182 units proposed, representing 50% provision overall (50% in terms of units and 50% in terms of the total habitable rooms). This scheme meets the Council's minimum target of 35% and the London Plan and LDF target of 50%.

Affordable Housing (Social Rent) Dwelling Mix

- 8.33 The affordable housing for social rent would comprise the following dwelling mix:

Affordable Rented	1 bed	2 bed	3 bed	4 bed	5 bed	Total
Units	12	16	16	5	2	51 (28%)
Habitable Rooms	24	48	64	25	12	173 (31%)

- 8.34 The scheme provides 45% family housing (including 4 and 5 bedroom units) in the social rent affordable housing component. The dwelling mix of the affordable housing thus complies with the Council's policies.

Affordable Housing (Intermediate) Dwelling Mix

The intermediate housing would comprise the following dwelling mix:

Intermediate	1 bed	2 bed	3 bed	4 bed	5 bed	total
Units	23	13	4	-	-	40 (24%)
Habitable rooms	50	42	16	-	-	108 (20%)

Ratio of Social Rented to Intermediate Housing

- 8.35 Of the affordable housing provision 63% would comprise social rented accommodation and 37% intermediate in terms of habitable rooms. This generally accords with the London Plan's objective that 70% of the affordable housing should be social rented and 30% intermediate. Policy HSG5 of the Local Development Framework – Core Strategy and Development Control Submission Document requires a social rented to intermediate ratio of 80:20 for affordable housing. The proposal exceeds this policy target and is generally consistent with the emerging LDF policy.

Overall Dwelling Mix

- 8.36 On appropriate sites, UDP Policy HSG7 requires new housing schemes to provide a mix of unit sizes including a "substantial proportion" of family dwellings of between 3 and 6 bedrooms.
- 8.37 Local Development Framework – Core Strategy and Development Control Submission Document HSG2 specifies the appropriate mix of units to reflect local need and provide balanced and sustainable communities. In terms of family accommodation, the Policy requires that 25% of intermediate and market housing to comprise units with 3 or more bedrooms respectively.
- 8.38 The overall housing would comprise the following dwelling mix:

	Total No of units	% of total units	HSG2 policy requirement
1 bed	43	23.6%	
2 bed	102	56%	
3 bed	30	16.5%	25%
4 bed	5	2.7%	
5 bed	2	1.1%	
TOTAL	182	100%	

8.39 It is considered that on balance the scheme provides a reasonable match with the Council's preferred unit mix specified in the Local Development Framework – Core Strategy and Development Control Submission Document. Within the intermediate and market housing, the scheme provides a total of 21% family housing against a target of 25%. On balance this is acceptable, taking into account the higher amount of affordable housing proposed.

The Blue Ribbon Network – Limehouse Cut

8.40 Immediately to the south of the subject site is the Limehouse Cut, which is designated in the proposals maps of both the UDP (1998) and Local Development Framework – Core Strategy and Development Control Submission Document as a site of nature conservation.

8.41 In addition the Limehouse Cut is part of the public realm contributing to London's Open Space Network. The Blue Ribbon Network identified in Section 4C of the London Plan sets out general policies for regeneration related to London's network of rivers, docks, canals and other open spaces, this is reiterated in Policy OSN3 of the Local Development Framework – Core Strategy and Development Control Submission Document.

8.42 It is acknowledged that in accordance with Policy DEV47 and DEV48 of the UDP (1998) the proposal will improve the aesthetic amenity of the site and the canal environs whilst also allowing for improved pedestrian access linkages through the site to the canal and its associated tow path.

8.43 Policy OSN3 of the Local Development Framework – Core Strategy and Development Control Submission Document states that development adjacent to the Blue Ribbon Network must respect its waterside location.

8.44 British Waterways were consulted given their role in the management, maintenance and preservation of the network of canals and other navigations. Both British Waterways and LBTH officers concur that the layout of the development has been designed to improve the relationship and to minimise the impact to the Limehouse Cut. The tallest element of the development is sited adjacent to the road bridge over the canal to give it a nodal function, and due to its orientation would not have any unacceptable overshadowing impact on the canal.

Energy Efficiency

8.45 The Local Development Framework – Core Strategy and Development Control Submission Document contains a number of policies to ensure the environmental sustainability of new development. Policy DEV6 requires major development to incorporate renewable energy production to provide at least 10% of the predicted energy requirements on site. In addition all new development is required include a variety of measures to maximise water conservation (Policy DEV7) incorporate sustainable drainage systems (Policy DEV8) and construction materials (Policy DEV9). In addition all new development is required to make sufficient provision for waste disposal and recycling facilities (Policy DEV15).

8.46 The applicant has submitted an energy statement which outlines the proposed and potential energy efficiency and renewable energy measures within the scheme consistent with the London Renewables toolkit and Part L of the building regulations. Biomass heating supplying

the community heating system is proposed. Biomass gas fired boilers would be arranged in parallel with the biomass boiler(s) as lead. The proposed development incorporates fuel storage at basement level with fuel deliveries to be carried out at ground level. The applicant states that during the detailed design of the scheme the system would be developed and sized to ensure that a 10% reduction in carbon dioxide emissions is achieved.

- 8.47 The GLA concludes in their Stage 1 Referral response that further discussions are required on the final details of how the applicant's energy proposals would be delivered to secure the Mayor's policy objectives. Suitable planning conditions and an informative can ensure that this undertaking is upheld.

Transport & Parking

- 8.48 Both the UDP and the Local Development Framework – Core Strategy and Development Control Submission Document contain a number of policies which encourage the creation of a sustainable transport network which minimises the need for car travel, lorries and supports movements by walking, cycling and public transport.
- 8.49 In accordance with Policy DEV17 the applicant has submitted a transport assessment which demonstrates the impacts of the development upon the local transport network and details a number of appropriate mitigation measures.
- 8.50 The site, which has a PTAL of 3 is generally well located in terms of public transport. TfL would expect a contribution towards bus services in the area via a Section 106 Agreement between the developer and the Borough.
- 8.51 Appropriate contributions as well as a Section 278 agreement, contributions for pedestrian and cycling improvements in the vicinity of the site, and a car free agreement are required and would be included in the Section 106 agreement. These contributions could be shared with other developments within the area.
- 8.52 76 cycle parking spaces are proposed in the basement area. TfL considered this level of provision inadequate and requires the level of cycle parking provision to be revised in line with TfL's Cycle Parking Standards. All the spaces should be secure and sheltered with lockers and changing room facilities provided for cyclists. CCTV is recommended for additional security in the basement parking area.

Amenity

- 8.53 UDP Policy DEV2 and policy DEV 1 Amenity of the Local Development Framework – Core Strategy and Development Control Submission Document seeks to ensure that development where possible protects and enhances the amenity of existing and future residents as well as the amenity of the public realm.
- 8.54 It is considered that the proposed development would not result in overlooking or loss of privacy to surrounding development. The proposal is massed in three separate buildings each with a separate relationship, to Thomas Road, Bow Common Lane and the Limehouse Cut. Given the siting of the buildings on the site, habitable room windows of dwellings within the development would be located in excess of 18 metres from adjoining development to the north of the site thereby minimising potential for loss of privacy and overlooking of surrounding properties. Internally the Thomas road and the Limehouse Cut blocks are adequately separated in excess of 18 metres thereby minimising impacts of internal overlooking and providing a high standard of privacy and amenity for future occupants. There are no other opportunities for direct overlooking within the development. The roof terraces proposed to each of the blocks would be suitably landscaped/treated to ensure minimal overlooking impacts both from within the development and to surrounding properties.

- 8.55 In relation to sun and daylight the applicant has undertaken a daylight study which indicates that the proposal maintains a good level of daylight and sunlight to surrounding properties. Generally the scheme is compliant with the BRE daylight guidance with only one window (9-43 Upper North Street) from all of the surrounding buildings not meeting the guidance. This window 14/20 at 4-43 Upper North Street to the north of the site fails to meet the ADF value of 1.5 by 0.6 achieving 1.44. In comparison to the existing condition this represents a 24% reduction which would be considered minimal in the context of the site.
- 8.56 The microclimatic conditions (wind assessment) as a result of the development have been assessed. The report concludes that comfort conditions at the selected locations would remain unaltered for all activities with the exception of long term sitting at the following locations:
- Junction of Bow Common Lane and Thomas Road
 - Bow Common Lane – Bridge over Limehouse Cut
 - South Bank Limehouse Cut
 - Corner of Kiln Street and Thomas Road

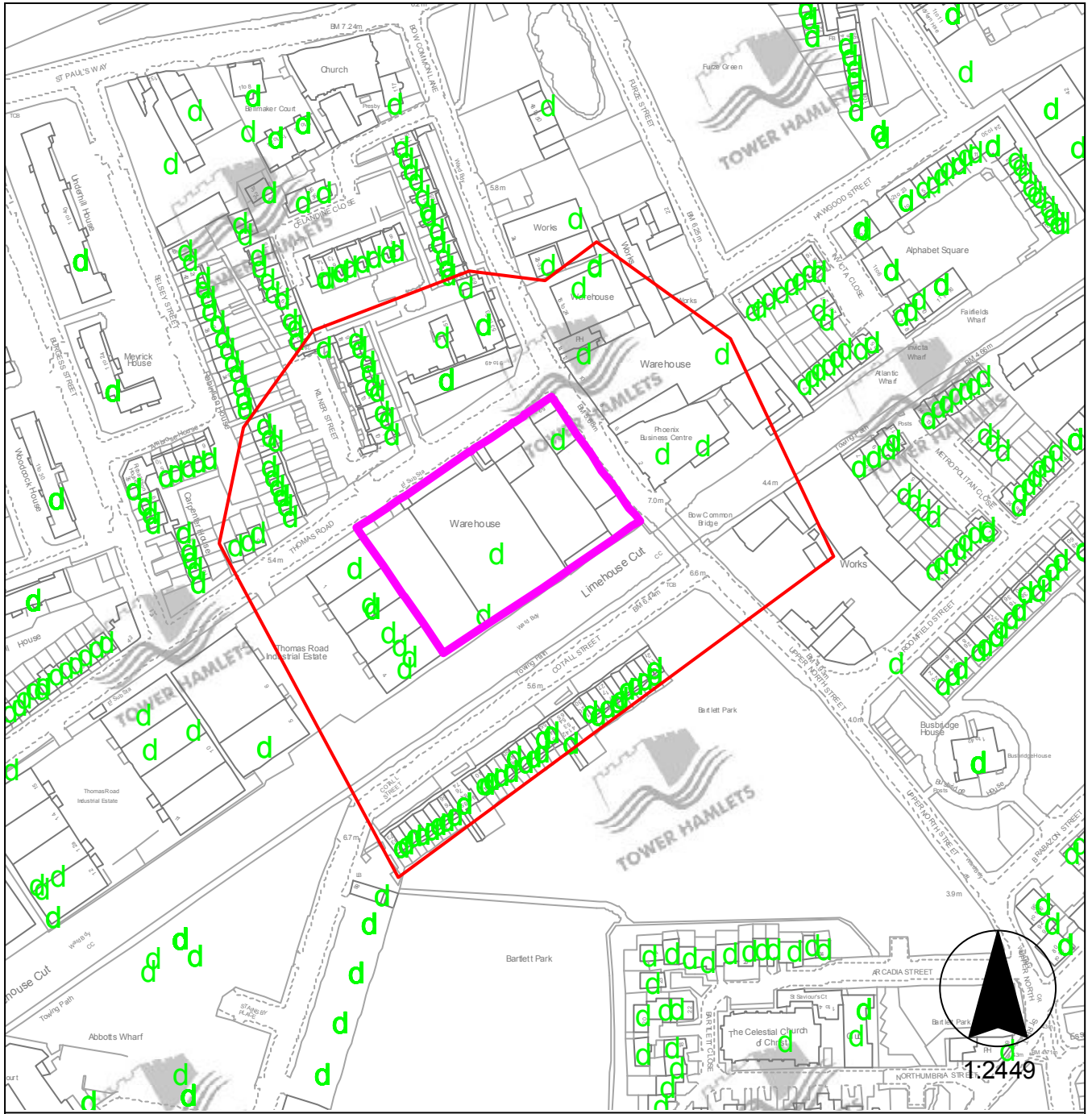
The microclimatic conditions are therefore considered to be acceptable.

- 8.57 Concerns have been raised as to the potential demolition and construction noise and vibration and associated impacts to the surrounding properties. A Demolition and Construction Method Statement (DCMS) would be required to be approved by the Council, prior to works commencing on site. The DCMS will also be required to comply with the Council's Code of Practice for Construction Sites.
- 8.58 Concerns have been raised regarding the impact of the development upon TV and radio reception in the surrounding area. The applicant has conducted a study on the effects of the development upon reception. It is concluded that there may be an adverse impact to the TV and radio reception of properties to the north depending on whether reception is provided from the Croydon/Crystal Palace or Poplar transmitters. Satellite dishes within the surrounding development are currently located close to the ground and may have to be relocated in order to improve reception. It is recommended that the developer consult with surrounding neighbours to ensure the reception is not adversely affected and if so reception is improved.

9.0 CONCLUSIONS

- 9.1 All other relevant policies and considerations have been taken into account. Planning permission should be granted for the reasons set out in the SUMMARY OF MATERIAL PLANNING CONSIDERATIONS and the details of the decision are set out in the RECOMMENDATION at the beginning of this report.

Site Map



Legend

- Planning Application Site Boundary
- Consultation Area
- d Land Parcel Address

This Site Map displays the Planning Application Site Boundary and the neighbouring Occupiers / Owners who were consulted as part of the Planning Application process. The Site Map was reproduced from the Ordnance Survey mapping with the permission of Her Majesty's Stationery Office © Crown Copyright. London Borough of Tower Hamlets LA086568

Agenda Item 6.3

Committee: Strategic Development	Date: 15th March 2007	Classification: Unrestricted	Agenda Item No: 6.3
Report of: Corporate Director of Development and Renewal		Title: Planning Application for Decision	
Case Officer: Tim Porter		Ref No: PA/06/01439	
		Ward(s): Millwall	

1. APPLICATION DETAILS

Location: 22-28 Marsh Wall and 2 Cuba Street and 17 to 23 Westferry Road, Marsh Wall, London

Existing Use: Vacant

Proposal: Construction of one building of 44 storeys (within the existing consented envelope - PA/05/00052), one building of 30 storeys (within the existing consented envelope - PA/05/00052) and two buildings of eight storeys to provide 802 dwellings, and a total of 3,267sq.m of retail (A1, A2, A3), Office (B1) and Community Uses (D1) at lower ground, ground and level 1, 5833 sq.m plant, public spaces and parking. (The application is accompanied by an Environmental Impact Assessment).

Drawing Nos: [15.1]_P001 (Rev. A), [15.1]_P002 (Rev. A), [15.1]_P003 (Rev. A), [15.1]_P108 (Rev. A), [15.1]_P109 (Rev. A), [15.1]_P110 (Rev. A), [15.1]_P111 (Rev. A), [15.1]_P112 (Rev. A), [15.1]_P113 (Rev. A), [15.1]_P114 (Rev. A), [15.1]_P115 (Rev. A), [15.1]_P116 (Rev. A), [15.1]_P117 (Rev. A), [15.1]_P118 (Rev. A), [15.1]_P119 (Rev. A), [15.1]_P120 (Rev. A), [15.1]_P121 (Rev. A), [15.1]_P122 (Rev. A), [15.1]_P124 (Rev. A), [15.1]_P129 (Rev. A), [15.1]_P131 (Rev. A), [15.1]_P133 (Rev. A), [15.2]_P001 (Rev. A), [15.2]_P002 (Rev. A), [15.2]_P003 (Rev. A), [15.2]_P010 (Rev. A), [15.2]_P011 (Rev. A), [15.2]_P012 (Rev. A), [15.2]_P013 (Rev. A), [15.2]_P014 (Rev. A), [15.2]_P015 (Rev. A), [15.2]_P016 (Rev. A), [15.2]_P017 (Rev. A), [15.3]_P001 (Rev. A), [15.3]_P002 (Rev. A), [15.3]_P003 (Rev. A), [15.3]_P004 (Rev. A), [15.3]_P005 (Rev. A), [15.3]_P006 (Rev. A), [15.3]_P007 (Rev. A), [20.1]_P001 (Rev. A), [20.1]_P002 (Rev. A), [62.1]_P001 (Rev. A), [62.1]_P002 (Rev. A).

Applicant: Chalegrove Properties Ltd C/- GVA Grimley

Owner: Celtic House (CM) Limited

Historic Building: N/A

Conservation Area: N/A

2. SUMMARY OF MATERIAL PLANNING CONSIDERATIONS

2.1 The local planning authority has considered the particular circumstances of this application against the Council's approved planning policies contained in the London Borough of Tower Hamlets Unitary Development Plan, associated supplementary planning guidance, the London Plan and Government Planning Policy Statements and Guidance and has found that:

a) In principle, the redevelopment of the site to provide one building of 44 storeys (within

LOCAL GOVERNMENT ACT 2000 (Section 97) LIST OF BACKGROUND PAPERS USED IN THE DRAFTING OF THIS REPORT

Brief Description of background papers:	Tick if copy supplied for register	Name and telephone no. of holder:
Application, plans, adopted UDP. draft LDF and London Plan		Tim Porter 020 7364 5291

the existing consented envelope - PA/05/00052), one building of 30 storeys (within the existing consented envelope - PA/05/00052) and two buildings of eight storeys to provide 802 dwellings, and a total of 3,267sq.m of retail (A1, A2, A3), Office (B1) and Community Uses (D1) at lower ground, ground and level 1, 5833 sq.m plant, public spaces and parking, is acceptable, subject to an appropriate planning obligations agreement and conditions to mitigate against the impact of the development;

- b) It is considered that the proposed uses would not have an adverse impact on the residential amenity of any nearby properties. A number of conditions are recommended to secure submission of details of materials, landscaping, external lighting and to control noise and hours of construction;
- c) The submitted Environmental Impact Assessment addendum is considered to satisfactorily identify the likely impacts and the necessary mitigation measures;
- d) The proposed development would deliver regeneration benefits comprising: improved townscape; public open space; modern employment facilities; and new residential accommodation;
- e) The proposed development would result in a sustainable, high quality, high density, mixed-use scheme that would contribute to the regeneration of the wider area; and
- f) The proposal includes contributions towards transport, health, education, employment, training and open space.

3. RECOMMENDATION

3.1 That the Committee resolve to **GRANT** planning permission subject to:

A. Any **direction** by **The Mayor**

B. The prior completion of a **legal agreement**, to the satisfaction of the Chief Legal Officer, to secure the following:

- (1) A proportion of 26.67% habitable room basis of the proposed units (i.e. 158 units) to be provided as on site affordable housing with the mix as specified in 8.49 of this report.
- (2) Provide £400,419 towards open space improvements to relieve the pressure that will arise from the new housing on existing overcrowded open space and recreational facilities within the Borough.
- (3) Preparation of a right of way “walking agreement” for crossing through the proposed site across to Marsh Wall.
- (4) Provide £452,649 (being £150,883 per annum for three years) to London Buses towards bus capacity.
- (5) Equipment upgrade to mitigate the adverse effects on DLR radio communications (Such as a booster to offset signal interruption).
- (7) Provide £116,064 towards the upgrade of the section of highway south of Westferry Circus.
- (8) Provide £406,223 for pedestrian and cycle environment improvements (i.e. to make 20m/ph zone or pedestrian friendly) to Cuba Street, Manilla Street, Tobago Street and Byng Street.

- (9) Provide £292,480 towards employment initiatives such as the Local Labour in Construction (LliC) or Skillsmatch in order to maximise the employment of local residents.
- (10) Provide £583,618 towards education to mitigate the demand of the additional population on education facilities.
- (11) Provide £2,927,377 towards healthcare to mitigate the demand of the additional population on health care services.
- (12) Preparation and implementation of a public art strategy including involvement of local artists.
- (13) TV reception monitoring and mitigation.
- (14) Preparation of a Travel Plan (for both the residential and commercial component).
- (15) Completion of a car free agreement to restrict occupants applying for residential parking permits.

Section 278 agreement to secure the following:

- (1) Off site highway works from Byng Street to the roundabout south of Westferry Circus Roundabout, and along boundary of property on Marsh Wall prior to the commencement of works on site. (This work is currently estimated at £464,255. Should the work not cost this amount the Council will reimburse the difference, should it cost more, the developer will be invoiced direct).

3.2 That the Head of Development Decisions be delegated power to impose conditions and informatives on the planning permission to secure the following:

Conditions

- (1) Time limit for Full Planning Permission
- (2) Details of the following are required:
 - Samples of materials for external fascia of building
 - Ground floor public realm (including children's play space and pedestrian route)
 - All external landscaping (including lighting and security measures), walkways, screens/ canopies, entrances, seating and litter bins;
 - The design of the lower floor elevations of commercial units including shopfronts;
 - Signage strategy; and
 - Roof treatment (Biodiversity roof for Black Redstarts and amenity space)
- (3) Landscape Management Plan required
- (4) Parking – maximum of 195 cars and a minimum of 813 cycle and 20 motorcycle spaces
- (5) Hours of construction limits (Between the hours of 8am and 6pm Mondays to Fridays and between the hours of 8am and 1pm Saturdays).
- (6) Details of insulation and of the ventilation system and any associated plant required
- (7) Hours of operation limits – hammer driven piling (10am – 4pm)
- (8) Wheel cleaning during construction required
- (9) Details of surface and foul water drainage system required
- (10) Impact study of water supply infrastructure required
- (11) Details required for on site drainage works
- (12) Details of finished floor levels required
- (13) Land contamination study required to be undertaken
- (14) The refuse/ recycling storage strategy to be implemented

- (15) Ground borne vibration limits
- (16) Construction Environmental Management Plan
- (17) Renewable energy measures to be approved in writing by the Local Planning Authority in consultation with the Greater London Authority and implemented in perpetuity
- (18) Details of the proposed D1 use
- (19) The southern elevations of Levels 2 to 7 of the two apartments of block 2 are required to have a visually opaque translucent frit
- (20) All residential accommodation to be built to Lifetime Homes standard, including at least 10% of all housing being wheelchair accessible.

Informatives

- (1) Thames Water advice
- (2) Environment Agency advice
- (3) Entertainment licensing advice
- (4) Site notice specifying the details of the contractor required
- (5) Surface water drainage advice
- (6) Construction Environmental Management Plan Advice
- (7) Highways Department Advice

3.3 That, if by 15th September 2007 the legal agreement has not been completed to the satisfaction of the Chief Legal Officer, the Head of Development Decisions be delegated power to refuse planning permission.

4. PROPOSAL AND LOCATION DETAILS

Proposal

- 4.1 The application is for the construction of one building of 44 storeys, one building of 30 storeys and two buildings of eight storeys to provide 802 dwellings, and a total of 3,267sq.m of retail (A1, A2, A3), Office (B1) and Community Uses (D1) at lower ground, ground and level 1, 5833 sq.m plant, public spaces and parking. The application is accompanied by an addendum to the previously submitted Environmental Impact Assessment.
- 4.2 The current planning application is the second planning application for this site. Planning permission for a mixed use scheme on the subject site was granted on the 24th of May 2006 (PA/05/00052).
- 4.3 The new landowner has submitted the current planning application to propose the following changes:
 - Reduction in floor to floor height from 3.2m to 2.9m.
 - Reduction of the plant areas within the buildings.
 - Duplex apartments to be sub-divided into single level apartments.
 - Reconfiguration of internal layouts.
 - Increase in number of storeys within Block 1 from 27 to 30 within the existing consented envelope.
 - Increase in number of storeys within Block 2 from 40 to 44 within the existing consented envelope.
 - New roof top terraces to Blocks 3 and 4 (the two 8-storey blocks for affordable housing), accessible by the residents of each block.
 - Additional 111 apartments (an increase from 691 to 802).
 - Increase in height of the roof-top plant level of Block 1 (from 100.6m to a maximum height of 103.85m AOD) and of Block 2 (from 142.2m to a maximum height of 145.25m AOD).

Site and Surroundings

- 4.4 The site is located on the Isle of Dogs, immediately south-west of the Canary Wharf estate, and is bound by Marsh Wall to the north east, Westferry Road to the west and Cuba Street to the south.
- 4.5 The total site area is 1.03 hectares. The site at the time the application was assessed was removed of the previous vacant industrial buildings (3 – 4 storeys) in accordance with the existing planning approval (PA/05/00052).
- 4.6 The site has a level difference of three metres from the south west corner to the north eastern boundary. The highest part of the site is at the north east portion at Marsh Wall.
- 4.7 Land use surrounding the site is characterised by a mix of uses, including high density office developments to the north and east (as part of Canary Wharf) and residential blocks to the south.
- 4.8 Directly north of and adjacent to the site is the City Pride Public House, which is two stories high. Adjacent to the site on the eastern boundary is No. 30 Marsh Wall, a six storey building. To the west of the site on the other side of Marsh Wall are “Sufferance Wharf” and “Anchorage Point”, residential developments of approximately five and eight stories, respectively. North west of the site is “Cascades”, a 20 storey residential building.
- 4.9 Opposite the site, on the corner of Westferry Road and Cuba Street is the Rogue Trader Public House, which is three stories high. Directly to the east of the site is the International Hotel and an office block. These buildings are approximately 9/5 storeys high. South of the site, the buildings along Westferry Road range in height from 4 – 6 storeys. Further south of the site the land on the southern side of Cuba Street has been cleared to make way for a mixed use development.
- 4.10 North west of the site (approximately 150m away) is Riverside South, a consented office development of two towers of 43 and 27 storeys.

Planning History

- 4.11 The following planning decisions are relevant to the application:

PA/05/00052 The Council granted consent on 24th May 2006 for the construction of one building of 40 storeys, one building of 27 storeys and two buildings of eight storeys to provide 691 dwellings, and a total of 3,107sq.m of retail (A1, A2, A3), Office (B1) and Community Uses (D1) at lower ground, ground and level 1, 6636 sq.m plant, public spaces and parking. The application was accompanied by an Environmental Impact Assessment.

5. POLICY FRAMEWORK

- 5.1 For details of the status of relevant policies see the front sheet for “Planning Applications for Decision” agenda items. The following policies are relevant to the application:

5.2 Unitary Development Plan

Proposals: Flood Protection Areas

Policies:	DEV1	Design Requirements
	DEV2	Environmental Requirements
	DEV3	Mixed Use Development
	DEV4	Planning Obligations
	DEV6	Buildings Outside the Central Area and Business Core

DEV7	Protection of Strategic Views
DEV8	Protection of Local Views
DEV12	Provision of Landscaping in Development
DEV13	Design of Landscaping Schemes
DEV18	Art and Development Proposals
DEV50	Noise
DEV51	Soil Tests
DEV55	Development and Waste Disposal
DEV56	Waste Recycling
DEV67	Recycled Materials
DEV68	Transportation of Materials
EMP1	Encouraging New Employment Uses
EMP6	Employing Local People
EMP10	Development Elsewhere in the Borough
HSG1	Quantity of Housing
HSG2	New Housing Development
HSG3	Affordable Housing
HSG7	Dwelling Mix
HSG8	Access for People with Disabilities
HSG9	Density
HSG13	Internal Standards for Residential Developments
HSG16	Amenity Space
T15	Transport and Development
T16	Impact of Traffic
T17	Parking Standards
T19	Pedestrians
T21	Pedestrians
T23	Cyclists
S6	New Retail Development
OS0	Children's Play Space
U2	Tidal and Flood Defences
U3 & U5	Flood Protection
U9	Sewerage Network

5.3 Emerging Local Development Framework

Proposals:		Flood Risk Area
	ID25	Residential (C3)
		Employment (B1)
		Retail & Leisure (A2, A3, A4)
		<i>(In accordance with the minor errata for London Borough of Tower Hamlets Local Development Framework Submission Documents)</i>
Core Strategies:	IMP1	Planning Obligations
	CP1	Creating Sustainable Communities
	CP2	Equal Opportunity
	CP3	Sustainable Environment
	CP4	Good Design
	CP5	Supporting Infrastructure
	CP7	Job Creation and Growth
	CP11	Sites in Employment Use
	CP19	New Housing Provision
	CP20	Sustainable Residential Density
	CP25	Housing Amenity Space
	CP30	Improving the Quality and Quantity of Open Space
	CP31	Biodiversity
	CP37	Flood Alleviation

CP38	Energy Efficiency and Production of Renewable Energy
CP39	Sustainable Waste Management
CP40	A Sustainable Transport Network
CP41	Integrating Development with Transport
CP42	Streets for People
CP46	Accessible and Inclusive Environments
CP47	Community Safety
CP48	Tall Buildings

Policies:	DEV1	Amenity
	DEV2	Character & Design
	DEV3	Accessibility & Inclusive Design
	DEV4	Safety & Security
	DEV5	Sustainable Design
	DEV6	Energy Efficiency & Renewable Energy
	DEV10	Disturbance from Noise Pollution
	DEV11	Air Pollution and Air Quality
	DEV12	Management of Demolition and Construction
	DEV14	Public Art
	DEV15	Waste and Recyclables Storage
	DEV16	Walking and Cycling Routes and Facilities
	DEV17	Transport Assessments
	DEV19	Parking for Motor Vehicles
	DEV20	Capacity of Utility Infrastructure
	DEV22	Contaminated Land
	DEV24	Accessible Amenities and Services
	DEV27	Tall Buildings Assessment
	EE2	Redevelopment /Change of Use of Employment Sites
	RT4	Retail Development
	HSG1	Determining Residential Density
	HSG2	Housing Mix
	HSG3	Affordable Housing
	HSG4	Social and Intermediate Housing ratio
	HSG7	Housing Amenity Space
	HSG9	Accessible and Adaptable Homes
	HSG10	Calculating Affordable Housing
	IOD1	Spatial Strategy
	IOD2	Transport and Movement
	IOD3	Health Facilities
	IOD4	Education Provision
	IOD5	Public Open Space
	IOD7	Flooding
	IOD8	Infrastructure Capacity
	IOD10	Infrastructure and Services
	IOD18	Employment Uses
	IOD19	Residential Uses
	IOD20	Retail and Leisure
	IOD21	Design and Built Form

5.4 Supplementary Planning Guidance/Documents

Designing Out Crime
Residential Space
Landscape Requirements

5.5 Spatial Development Strategy for Greater London (London Plan)

3B.4	Mixed Use Development
3D.12	Biodiversity
4A.7	Energy Efficiency and Renewable Energy
4A.8	Energy Assessment
4A.9	Providing for Renewable Energy
4A.10	Supporting the provision of renewable energy
4A.14	Reducing Noise
4B.1	Design Principles for a compact city
4B.2	Promoting world class architecture and design
4B.3	Maximising the potential of sites
4B.4	Enhancing the Quality of the Public realm
4B.5	Creating an inclusive environment
4B.6	Sustainable Design and construction
4B.7	Respect Local context and communities
4B.8	Tall buildings, location
4B.9	Large scale buildings, design and impact

5.6 Government Planning Policy Guidance/Statements

PPS1	Delivering Sustainable Development
PPS3	Housing
PPS22	Renewable Energy
PPG24	Noise

5.7 Community Plan The following Community Plan objectives relate to the application:

- A better place for living safely
- A better place for living well
- A better place for creating and sharing prosperity

6. CONSULTATION RESPONSE

6.1 The views of officers within the Directorate of Development and Renewal are expressed in the MATERIAL PLANNING CONSIDERATIONS section below. The following were consulted regarding the application:

LBTH Highways

6.2 Further to the comments made for the consented scheme, in view of there being no change to the transport related issues, Highways have no objection.

The following comments were made for the consented scheme:

- Planning obligations for pedestrian and cycle environment improvements (i.e. to make 20m/ph zone or pedestrian friendly) to Cuba Street, Manilla Street, Tobago Street and Byng Street;
- A right of way “walking agreement” for crossing through the proposed site across to Marsh Wall. The walkway agreement is usually under Section 35 of the Highways Act;
- S278 agreement required to carry out off site highway works from Byng Street to the roundabout south of Westferry Circus Roundabout, and along boundary of property on Marsh Wall prior to the commencement of works on site;
- Satisfied with visibility issues;
- A Travel Plan is required for both the residential and commercial component;
- The transport assessment is satisfactory and includes a cumulative assessment of future traffic conditions; and
- Recommended that a condition to ensure that a Construction Traffic Management Assessment is carried out and approved prior to the commencement of the development. (This must also be a cumulative assessment that considers the exiting construction traffic at the time).

LBTH Environmental Health

6.3 Contaminated Land Officer

Recommended that a condition be imposed requiring an investigation to assess the nature and extent of contamination (or otherwise) and consider the most appropriate mitigation measures (if any).

Air Quality

No response. However, the comments made for the consented scheme are considered relevant for this scheme:

- Development should be 'car free';
- Condition and Informative to ensure that the Code of Construction Practise (called Construction Method Statement in the ES) is approved by LBTH prior to the commencement of site works; and
- Condition to protect the amenity of future occupants and/ or neighbours in terms of air quality.

Noise and Vibration

The comments made for the consented scheme are considered relevant for the proposed development:

- Night time works are not allowed and will be considered via dispensation process under a Section 61 agreement;
- The LBTH impulsive vibration limits are 1mm/s ppv and 3mm/s ppv at residential and commercial respectively;
- Adequate mitigation measures for the construction noise will be required and should be submitted as part of the Section 61 consent application in order to ensure the Council's 75dB(A) limit is complied with; and
- The mitigation measures suggested for road traffic noise are adequate.

Micro-climate (Sunlight/ Daylight and Wind Assessment)

No response. However, given that the development is similar to the consented scheme, the scheme is considered acceptable in accordance with the comments made for the consented scheme.

LBTH Housing

6.4 The following comments were made by housing:

- *The applicant is offering 19% of units as affordable or 26.7% by Habitable room*
- *Only 4% of the units for sale are family units. The target for the scheme is 25%. There needs to be an increase in the number of family units in this segment of the scheme.*
- *Housing Development will accept the revised quantum of affordable housing at 26.67% subject to the GLA approval of the Toolkit assessment.*

LBTH Cleansing

6.5 No comment.

LBTH Leisure Services/ Landscape

6.6 No response.

LBTH Corporate Access Officer

6.7 No response, however, the comments made for the previous scheme are considered

relevant:

'Satisfied subject to the public realm being usable by all and incorporates the principles of inclusive access, i.e. accessible to people with disabilities, children, the elderly and infirm'.

Crime Prevention Officer

6.8 No comment:

Greater London Authority (GLA)

6.9 The GLA considered the proposed scheme on the 10th January 2006 at Stage 1 and in summary recommend the following:

Having considered the report, the Mayor has concluded that the scheme is acceptable in strategic planning terms subject to the clarification of the issues identified in the report. These include:

- A request for more information to fully assess the scheme in terms of sustainable development.*
- A request for more information on the Section 106 agreement, to ensure that the proposed development can be accommodated within the transport network.*

(OFFICER COMMENT: This issue is addressed at Section 8.70 of this report)

More specifically, the following comments were made:

- The current scheme is close to double the high end of the range of the London Plan density matrix. The site is, however, part of the Canary Wharf area, which is suitable for tall buildings and high density. Providing there is sufficient open space for future residents and that there is an adequate social infrastructure, the very high density is not out of context.*
- Although the open space provision falls well short of space requirements...the proposal maximises the available open space by providing dedicated children's playspace on the ground floor and on the top of the 8-storey blocks for affordable housing. Further communal space is provided at the same locations. Part of the Section 106 agreement should be dedicated for the provision of space for play and sport off-site;*
- More information is required to clarify the validity of the toolkit;*
- The break down of the affordable housing is inline with requirements of the Housing supplementary planning guidance;*
- The urban design and architecture is similar to that of the consented scheme and is therefore of high quality and commensurate with the Canary Wharf context;*
- The public open space on lower ground floor and ground floor is fully accessible and provides an inclusive environment within the topographical constraints of the site;*
- The use of energy efficient design and district heating is welcomed but more information is needed to fully assess the proposal in sustainable development terms.*
- The development is broadly in line with the London Plan policies for improving London's transport infrastructure but further information is needed on the Section 106 agreement for transport infrastructure improvements, to ensure that the proposed development can be accommodated within the transport network.*

(OFFICER COMMENT: The applicant provided further information to the GLA to clarify the validity of the Toolkit assessment and has been addressed under section 8 of this report).

Environment Agency (Statutory Consultee)

6.10 No further comments in addition to those made in their previous letter dated 22nd February 2005 regarding the consented scheme. The Agency recommended a number of conditions to

ensure that the development is subject to minimum risk of flooding, to prevent pollution of the water environment and ground water.

Countryside Agency (Statutory Consultee)

6.11 No comment

English Nature (Statutory Consultee)

6.12 No comment

Docklands Light Railway (Part of the GLA)

6.13 DLR recommended a number of items to be included as part of the S106 agreement:

- Equipment upgrade to mitigate the adverse effects on DLR radio communications (such as a booster to offset signal interruption). (OFFICER COMMENT: The developer has agreed that this will be included as an item in the S106 agreement); and
- A contribution will be required towards DLR capacity enhancement scheme, recognising that the proposal's greatest impact is on the non-critical sections of the DLR line. This contribution will also be required to enhance pedestrian links to Heron Quays, South Quay and Canary Wharf stations.

(OFFICER COMMENT: Under the previous scheme, the DLR advised that as the development is located at the end of Marsh Wall towards Westferry Road, the impact on the DLR is minimal. South Quay station is moving further away from the site and the Jubilee Line/Canary Wharf is a similar walking distance as Heron Quays station which is already built to 3-car standard. Based on this, TfL did not seek a sum of money towards DLR improvements. This position is maintained for the proposed development).

Transport for London (Part of the GLA)

6.14 TfL recommended a number of items to be included as part of the S106 agreement for the consented scheme:

- London Buses contribution towards bus capacity enhancements and increased frequencies within the Isle of Dogs on the D7 and D3 routes and towards the new D5 service resulting from the proposed development. The developer agreed to pay a sum of £130,000 per annum for three years.

Under the new proposal, the following was proposed:

- Additional bus capacity needs to be provided, either by an extension to route 330, providing new links to areas in East London that currently do not have direct links to the Isle of Dogs, or a new route between Canary Wharf and the City. TfL seeks a contribution of £150,000 each year for three years (total contribution of £450,000). (OFFICER COMMENT: This has been included in the Section 106 contribution)

London Fire and Emergency Planning Authority

6.15 No comment

London Borough of Southwark, Planning & Regeneration

6.16 No comment.

London City Airport

6.17 No safeguarding objection

BBC - Reception Advice

6.18 TV reception mitigation measures required as with the consented scheme.

British Waterways

6.19 Not consulted as they had no objection with the consented scheme. In this correspondence British Waterways requested Council to consider the potential shadowing of Harbour Quay Hotel when deciding this application.

Thames Water Authority

6.20 Recommended a number of conditions to ensure that foul and/ or surface water discharge from the site does not prejudice the existing sewerage system and to ensure that the water supply infrastructure has sufficient capacity to cope with the additional demand.

7. LOCAL REPRESENTATION

7.1 A total of 176 neighbouring properties within the area shown on the map appended to this report were notified about the application and invited to comment. [The application has also been publicised in East End Life and on site.] The number of representations received from neighbours and local groups in response to notification and publicity of the application were as follows:

No of individual responses:	2	Objecting:	2	Supporting:	0
No of petitions received:	0				

7.2 The following issues were raised in representations that are material to the determination of the application, and they are addressed in the next section of this report:

- The scale and height of development is out of character with the local area
- The local area cannot cope with the increase in new dwellings.
- The development will have a negative impact upon parking and local services
- Impact upon views and natural light.

7.3 The following issues were raised in representations, but they are not material to the determination of the application:

- The development will have a negative impact on property prices

8. MATERIAL PLANNING CONSIDERATIONS

8.1 The main planning issues raised by the application that the committee must consider are:

- Land Use
- Height, Density and Scale
- Privacy and Overlooking
- Amenity
- Open Space
- Housing
- Access and Transport
- Servicing and Refuse Provisions

- Access and Inclusive Design
- Sustainable Development/ Renewable Energy
- Biodiversity
- Planning Obligations

Land Use

8.2 The site has been removed of the vacant industrial buildings that previously existed on the site. The site is outside of the “Central Area Zone” designation of the UDP and the Millennium Quarter Master Plan area. However, the high rise Canary Wharf Estate is located to the immediate north and north east of the site, whilst east of the site are the high rise buildings of the Millennium Quarter area. Lower residential scale buildings are located to the west and south of the site. The following land uses were considered acceptable by the Council in accordance with the consented scheme (PA/05/52).

Residential Component

8.3 The proposal would provide 802 residential units, and is therefore consistent with the requirements of Policy HSG1 and Draft Core Strategy CS6 of the LDF which seeks to ensure that the Borough’s housing targets are met. The London Plan housing targets (December 2006) for Tower Hamlets from 2007 to 2016 is 31,500 new homes.

Commercial Component

8.4 A total of 2,260sq.m of Retail (A1, A2, and A3) and Office (B1) and 1,007sq.m of Community Uses (D1) at lower ground, ground and level 1 are proposed.

8.5 The proposed commercial component is slightly larger than the approved scheme which was considered to comply with Policy S6 of the UDP and Policy RT4 of the emerging LDF Core Strategy document. The proposal accords with Policy EMP1 and in particular Policy EMP2(1) of the UDP. The previous use employed approximately 30 people, though this has already been removed from the site. The proposed commercial component would generate employment for a total of 153 people.

8.6 Similarly, the proposal is considered to satisfy Policy EE2 of the emerging LDF Core Strategy document. The applicant provided a Re-location Strategy in accordance with the requirements of the London Development Agency (LDA) for the consented scheme. The strategy ensures that the current leaseholders identify suitable premises. The LDA confirmed that they were satisfied with the consented scheme, which the proposed development generally conforms to.

8.7 The preferred use for the site in accordance with the Draft IOD AAP minor errata is “Mixed Use Residential (C3), Employment (B1) and Retail & Leisure (A2, A3, A4)”. The proposal is thus considered to satisfy the mixed uses specified by this allocation.

Flood Protection Area

8.8 Both the UDP and the emerging LDF Proposals Map designate the site within a “Flood Protection Area”. Council has consulted with the Environment Agency in relation to tidal and flood defences, in accordance with Policy U2 of the UDP. In accordance with Policies U3 and U5, appropriate mitigation measures to protect against flooding, have been recommended by the Environment Agency. These will be enforced via planning conditions.

Height, Density and Scale

Height

8.9 In terms of scale, UDP Policy DEV6 specifies that high buildings may be acceptable subject to

considerations of design, siting, the character of the locality and their effect on views. Considerations include, overshadowing in terms of adjoining properties, creation of areas subject to wind turbulence, and effect on television and radio interference.

8.10 Influencing the assessment of this scheme is the previously approved development. In respect of height and scale the differences between the two schemes are as follows:

- Height of Block 1 is slightly higher than the approved tower: 103.85m compared to 100.6m (approved).
- Height of Block 2 is also slightly higher than the approved tower: 145.25m compared to 142.2m (approved).
- Height of Blocks 3 and 4 remain consistent with the approved scheme.

8.11 The proposed increase in the size of the roof top plant level for the two towers is the reason for the increase in the overall height by approximately 3m. It is considered that the proposed increase in height is de minimis.

8.12 The GLA considered the proposed scheme on the 10th January 2006 and recommended that:

“The urban design and architecture is similar to that of the consented scheme and is therefore of high quality and commensurate with the Canary Wharf context”.

8.13 Policy CP 48 of the LDF Core Strategy and Development Control Development Plan Document supports the development of tall buildings in the northern part of the Isle of Dogs where they consolidate the existing tall building cluster at Canary Wharf. The site is identified just outside of the cluster however the policy goes on to say the Council may consider proposals for tall buildings outside the cluster if adequate justification is made. All proposals for tall buildings must:

- Contribute positively to a high quality, attractive environment;
- Respond sensitively to the surrounding local context;
- Not create unacceptable impacts on the surrounding environment;
- Contribute to the social and economic vitality of the surrounding area; and
- Not create unacceptable impacts on social and physical infrastructure.

8.14 Policy DEV1 of the emerging LDF Core Strategy requires development to protect, and where possible improve the amenity of surrounding building occupants and policy DEV2 requires development to take into account and respect the local character and setting of the site including the scale, height, mass, bulk and form of development.

8.15 Policy DEV27 of the emerging LDF Core Strategy provides a suite of criteria that applications for tall buildings must satisfy. In line with comments made with the previous scheme, the proposal satisfies the relevant criteria of Policy DEV27 as follows:

- the architectural quality of the building is considered to be of a high design quality;
- it contributes to an interesting skyline, and contributes to the general graduation of maximum building heights from north to south as set out in the adopted Millennium Quarter Masterplan and the Isle of Dogs Area Action Plan;
- it meets the standards of sustainable construction and resource management;
- it meets the Council's requirements in terms of micro-climate;
- it enhances the movement of people, in particular the pedestrian movement from the southern portion of the site to Marsh Wall;
- appropriate planning obligations are included to mitigate the impact of the development on the existing social facilities in the area;
- the proposal satisfies the Council's requirements in terms of impact on privacy, amenity and overshadowing;
- the London City Airport has assessed the proposal in terms of conformity with the Civil Aviation Requirements and concluded that they have no safeguarding objection. For the

consented scheme, the BBC considered the proposal in terms of the impact on the telecommunications and radio transmission networks and concluded any impacts of the development can be mitigated via an appropriate clause in the S106 agreement;

- the transport capacity of the area now and in the future was considered as part of the Environmental Impact Assessment process. The Council's Highways Authority have concluded that the transport assessments submitted satisfy the Council's requirements;
- the scheme provides a total of 7,596sq.m of amenity space. The proposal also includes two separate child play spaces and an appropriate S106 contribution to improve existing open spaces. The amenity space arrangements are considered to satisfy the Council's requirements;
- the mix of uses proposed are considered appropriate.
- the overall sustainability of the project is considered satisfactory.

Density

- 8.16 The scheme would result in a residential density of 779 units per hectare (802 units/ 1.03 hectares) or 2002 habitable rooms per hectare (2062 habitable rooms/ 1.03 hectares). This substantially exceeds the guidance of 247 hrph provided by Policy HSG9 of the UDP 1998.
- 8.17 UDP policy HSG9 has largely been superseded by the density policies of the London Plan 2004 and Policy HSG1 of the LDF Core Strategy. These both include the implementation of a density, location and parking matrix, which links density to public transport availability as defined by PTAL (Public Transport Accessibility Level) scores which are measured on a scale of 1 (low) – 6 (high). Policy HSG1 of the LDF Core Strategy requires the local context and character to be taken into account.
- 8.18 The site is excellently served by public transport with a PTAL of 5. For 'central site's with a PTAL range of 4 to 6, the recommended density of 650-1100 hrph. The proposed density is thus some 50% greater than the advised range in the London Plan 'Density Location and Parking Matrix'. Notwithstanding this, Policy 4B.3 of the London Plan seeks to encourage the highest possible intensity of use compatible with the local context.
- 8.19 As mentioned above, influencing the assessment of this scheme is the previously approved scheme. The approved scheme had a density of 671 units per hectare (691 units/ 1.03 hectares) or 1705 habitable rooms per hectare (1756 habitable rooms/ 1.03 hectares), which was considered acceptable in accordance with Policy 4B.3 of the London Plan.
- 8.20 The GLA assessed the proposed scheme in terms of density and determined that:

"The current scheme is close to double the high end of the range of the London Plan density matrix. The site is, however, part of the Canary Wharf area, which is suitable for tall buildings and high density. Providing there is sufficient open space for future residents and that there is an adequate social infrastructure, the very high density is not out of context."

- 8.21 In consideration of the above, the height, density and scale of the development is appropriate subject to the delivery of sufficient open space and social infrastructure, which the developer has agreed to.

Views

- 8.22 The site does not lie within the foreground or background of any of the safeguarded strategic views listed in the Regional Planning Guidance (RPG) 3 Annex A: Supplementary Guidance for London on the Protection of Strategic Views, nor in the foreground or background of any new views that are introduced in the Draft SPG London View Management Framework (GLA, April 2005).

Design and External Appearance

8.23 The Council's urban design officer previously considered the elevational design and materials proposed and concluded that the scheme has the potential to be developed into high quality architecture, subject to detailed design and development. The GLA considered the proposed scheme and advised that the *urban design and architecture is similar to that of the consented scheme and is therefore of high quality and commensurate with the Canary Wharf context*. As such it is recommended that an appropriate condition be included to ensure that the samples of the materials to be used on the external face of the building(s) are submitted for approval prior to the commencement of the development to ensure that the external appearance of the development is satisfactory. Such condition is considered appropriate for the proposed scheme.

Privacy and Overlooking

8.24 Blocks 2 and 4 are located within 18m of each other at a distance of 8m. As such, the south elevations of Levels 2 to 7 of the two apartments at the south end of block 2 will have a visually opaque translucent frit. The living rooms will each retain clear unobstructed views east and west, providing both views and light. The south wall of the living room will provide additional light, while preventing views south toward block 4.

8.25 Apart from this, the configuration of the internal layout of the buildings ensures that there are no opposing habitable room windows less than 18m apart. Consequently, it is considered that the proposal complies with Policy DEV2 of the UDP which seeks to ensure that adjoining buildings are not adversely affected by loss of privacy.

Amenity

EIA

8.26 The Environmental Statement (ES) for this application is submitted by means of addenda to the 2004 ES and 2005 Regulation 19 Response Report (PA/05/00052). The addendum report provides additional environmental information to supplement the Environmental Statement (ES). The addendum report reviews the minor changes to impacts previously identified as part of the 2004 ES. A number of issues previously covered in the ES remain unchanged and require no further additional changes to the conclusions.

8.27 The Council's contracted consultants; Bureau Veritas, undertook a review of the Environmental Statement addendum. The ES was found to be appropriate for the development and is considered to meet the requirements of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999.

Open Space

8.28 Policy HSG16 of the UDP requires that new developments should include adequate provision of amenity space, and they should not increase pressure on existing open space areas and playgrounds. The Council's Residential Space SPG includes a number of requirements to ensure that adequate provision of open space is provided.

8.29 SPG Requirement

- 50sqm of private space per family unit
- 50sqm plus an additional 5sqm per 5 non-family units;

8.30 Proposal Would Generate:

- 120 family units (120 x 50) = 6000sqm

- 682 non-family units (682 + 50) = 732sqm
- This equates to a total requirement for 6732sqm in accordance with the SPG (an increase of 1434sq.m from the requirements for the approved scheme).

8.31 Following is an assessment against the residential amenity space requirements under policy HSG7 of the emerging LDF Core Strategy document.

Units	Total	Minimum Standard per Unit (sq.m)	Required Provision (sq.m)
Studio	22	6	132
1 Bed	460	6	2760
2 Bed	200	10	2000
3 Bed	80	10	800
4 Bed	40	10	400
TOTAL	802		6092 sqm
Communal amenity			
		50sqm for the first 10 units, plus a further 1sqm for every additional unit	842sq.m (50sq.m plus 792sqm).
Total Housing Amenity Space Requirement			
			6934sqm

8.33 The proposal provides the following housing and communal amenity space:

- 3,154sqm balcony space (the applicant has advised that all units have access to private balcony space)
- 852sqm of dedicated child play space
- 3,328sq.m communal space at ground level (North East Square, Central Square and Community Garden) plus 262sq.m of landscaped roof terrace
- 7,596sqm total amenity space provided on site (an increase of 1499sqm from the approved scheme provision)

8.34 The GLA has indicated that the scheme will generate 336 children. Council's SPG and emerging LDF policy require the provision of 3sqm of child play space per child. Therefore a requirement of 1008sqm of child play space is generated. A total of 852sqm of dedicated child play space is provided (in two sections for two age groups on the ground floor and on the top two 8-storey buildings).

8.35 The GLA made the following comments:

The proposal maximises the space available to provide dedicated playspace and other communal open space. Since the site is only 1.03 hectares in size any additional playspace would be at the cost of one of the buildings. The local area provides a number of additional play spaces, either formal or informal. There is a neighbourhood park circa 500 metres away to the south along Westferry Road and there are traffic free pavements along the river Thames and the various docks. Mudchute Park is circa one and a half kilometre to the southeast.

Part of the Section 106 agreement should be dedicated for the provision of space for play and sport off-site.

8.36 The emerging LDF Isle of Dogs Area Action Plan recognises that there is the relative lack of opportunity to increase the amount of open space within the Island, together with poor access to some of the existing open spaces and the general need to improve the environmental quality in key areas.

8.37 In the previous scheme which also had a shortfall, the Council's Landscape Development

Team advised that an appropriate solution is to make a Section 106 contribution towards improving open space in the area, which the applicant is providing.

8.38 The proposed development generally accords with the amenity space provisions of the Residential Space – SPG. In considering the emerging LDF, there is a deficiency in the provision of private amenity space and child play space, however, given the substantial provision of communal amenity space and further contribution towards the provision of open space in the local area, the proposed amenity space provision is considered to be satisfactory.

Housing

Affordable Housing

8.39 Policy HSG3 of the UDP states that the Council will seek a reasonable provision of affordable housing consistent with the merits of each case and with the strategic target of 25%.

8.40 Policy CP22 of the emerging LDF Core Strategy document states that the Council will seek to maximise all opportunities for affordable housing on each site, in order to achieve a 50% affordable housing target across the Borough, with a minimum of 35% affordable housing provision.

8.41 The London Plan set out a strategic target that 50% of the new housing provision should be affordable.

8.42 The proposal provides 158 affordable housing units, which equates to the following:

- 26.67% on habitable room basis
- 19.7% on unit basis

8.43 The approved scheme provided 125 affordable housing units, which equated to the following:

- 25.25% on habitable room basis
- 18.09% on unit basis

8.44 The applicant submitted an “Affordable Housing Development Control Toolkit” as an assessment of viability of the scheme. An assessment of the appropriate level of affordable housing should involve undertaking a full financial assessment of the proposal, which evaluates a range of variables, in addition to the availability of public subsidy. Other factors include the individual site costs, economic viability, and the cumulative package of the Section 106 benefits. The toolkit allows users to test the economic implications of different types and amounts of planning obligations, including the amount and mix of affordable housing.

8.45 For the consented scheme, the GLA determined:

“... it would not be financially viable to increase the proportion of affordable housing in this scheme. GLA officers have verified the appraisal and it is clear that the absence of social housing grant and the very high build costs for this scheme are significant factors contributing to the low level of affordable housing proposed. This is also in line with Policy 3A.4 of the London Plan”.

8.46 The GLA has made the following response to the proposed scheme:

“The proposed 20% affordable housing (or 158 flats) is considerably less than the 50% London Plan target. It is, however, more than the 18% of the consented scheme. The applicant has submitted a financial appraisal, highlighting various exceptional costs that, as with the consented scheme, sought to justify the low provision of affordable housing. More information is needed to clarify the validity of some of the inputs of the toolkit. Even with an affordable housing percentage of 20, the toolkit still shows a deficit of £28 million for the project”.

8.47 The applicant provided the GLA with further information to justify the deficit. Whilst the provision of the land acquisition cost assumption value is still outstanding, the GLA's Senior Strategic Officer (Housing), has advised that this is unlikely to have a significant impact upon the current viability of the Toolkit assessment.

8.48 The Council's Housing Officer concluded that "*Housing Development will accept the revised quantum of affordable housing at 26.67% on production of the GLA sign off*" of the toolkit inputs.

Social Rented/ Intermediate Ratio

8.49 Policy CP22 of the emerging LDF Core Strategy document states that the Council will require a social rented to intermediate housing ratio split of 80:20 for all grant free affordable housing.

8.50 The affordable housing provision includes 104 socially rented units and 54 intermediate rented units. The housing ratio split is represented as 66% (social rented) to 34% (intermediate housing). The applicant's Toolkit assessment is prepared on the basis of the above tenure mix. According to the Toolkit, additional social rented accommodation would have a negative impact upon the overall value of the scheme, which the scheme is not able to afford. The consented scheme contains a total of 125 units (33 less than the new application), with 102 (82%) of these being in the social rented tenures, and 23 being for shared ownership (18%).

8.51 The socially rented element continues to be provided in the two lower rise buildings where service charges can be efficiently managed. Given townscape constraints these buildings have a finite capacity. Where the applicant is providing additional affordable housing over and above that which the toolkit justifies this is provided in the taller buildings as intermediate housing.

8.52 The GLA have raised no objection to the proposed housing split.

Housing Mix

8.53 The scheme provides a total of 802 residential units. The table below summarises the overall mix of units by type:

Units	Total	% of Total
Studio	22	2.7%
1 Bed	460	57.4%
2 Bed	200	24.9%
3 Bed	80	10%
4 Bed	40	5%
TOTAL	802	100

8.54 The consented scheme provided a total of 691 residential units. The table below summarises the overall approved mix of units by type:

Units	Total	% of Total
Studio	30	4%
1 Bed	374	54%
2 Bed	194	28%
3 Bed	69	10%
4 Bed	24	3%
TOTAL	691	100

8.55 The overall mix proposed is relatively similar to the consented scheme, with a slight increase in family housing.

8.56 Policy HSG7 of the UDP specifies that new housing developments will be expected to provide a mix of unit sizes where appropriate, including a substantial proportion of family dwellings of between 3 and 6 bedrooms.

8.57 The table below summarises the proposed housing mix in comparison to the Council's Core Strategy document:

Unit size	Total units in scheme	affordable housing						market housing		
		social rented			intermediate			private sale		
		units	%	target %	units	%	target %	units	%	target %
Studio	22	0						22	3.4	
1 bed	460	16	15	20	36	67	37.5	408	63.4	37.5
2 bed	200	0	0	35	18	33	37.5	182	28.3	37.5
3 bed	80	48	46	30	0	0	25	32	4.9	25
4 bed	40	40	39	10	0			0		
5 Bed	0	0	0	5	0			0		
TOTAL	802	104	100	100	54	100	100	644	100	100

8.58 The social rented component of the affordable housing provides a total of 85% of units as family housing. The GLA concluded that the affordable housing dwelling mix is in line with the Housing Supplementary Planning Guidance (November 2006).

8.59 Further, the GLA also state:

“Chapter 3A of the London Plan stipulates a range of housing types and sizes in order to create mixed and balanced communities. There is concern that the 802 dwellings are skewed towards the smaller type dwellings and that this exacerbates the situation of the consented scheme which was already skewed towards smaller units. The current scheme has 60% studios and 1-bed flats (up from 58% from the consented scheme). While this percentage does not represent a significant increase, it does emphasise the necessity to have an adequate social infrastructure in place to accommodate the 111 extra dwellings”.

8.60 The intermediate and market housing components of the scheme do not comply with the housing mix targets of the emerging LDF. However the housing mix of the proposed scheme is relatively consistent with the approved scheme, and results in a 2% increase of family housing. Further, the applicant is providing 85% family housing in the affordable component, exceeding the Council's target of 45%.

8.61 The applicant has provided the Council with alternative toolkit assessments testing the following scenarios:

- Toolkit assessment for a 35% affordable housing scheme that is compliant with the LDF housing mix target.
- Toolkit assessment for the proposed 26.67% affordable housing scheme that is compliant with the LDF housing mix target.

- 8.62 On balance, of the three toolkit assessment scenarios, the proposed scheme is considered to be the most appropriate scenario in consideration of the site constraints. The additional appraisals would provide higher negative residual values which may result in the further reduction of affordable housing on-site if implemented.
- 8.63 In view of the comments made above, the affordable housing provision and housing mix is considered to be appropriate where the proposed contributions towards social infrastructure are secured to accommodate the 111 extra dwellings.

Access and Transport

Access

- 8.64 Vehicular access to the basement parking area, for cars, motorcycles and bicycles is provided from Cuba Street. Secondary access to the plaza area is provided from Marsh Wall in two locations for servicing the small retail and office units and to provide private drop off. The use of these secondary accesses will be restricted and controlled. A third access is to be provided on Westferry Road for limited access to the Plaza.
- 8.65 The pedestrian environment will be improved through the opening up of the site and the creation of new routes and vistas. This will be enhanced by the ground floor retail uses and open spaces, providing a connection between Marsh Wall and Westferry Road. Appropriate conditions will be included for lighting, signage and the inclusion of quality materials along the pedestrian route.
- 8.66 The applicant has advised that the development footprint, envelope, access arrangements and servicing arrangements remain unchanged from the consented scheme. The Council's Highways officer has confirmed that in view of there being no change to the transport related issues, the development is considered acceptable.

Parking

- 8.67 The 802 residential units will be provided with 195 carparking spaces at basement level. This equates to approximately 0.24 spaces per unit, or 22% of the Council's adopted maximum standard of 1.1 spaces per unit (the approved scheme equated to 0.28 spaces per unit, or 25% of the Council's adopted maximum standard). It is recommended that the S106 agreement include a clause to ensure that the development is 'car free', ensuring that no controlled parking permits are issued to the new residents of the development and thus alleviating additional pressure on the surrounding streets. Overall, the car parking provisions are in accordance with the standards set out within the UDP and are at a level, which supports current Government guidance on encouraging trips by other means.
- 8.68 The following are also proposed in the basement:
- 19 disabled carparking spaces;
 - 20 motorcycle spaces; and
 - 813 secure cycle spaces (of which a total of 11 spaces will be provided at grade and will be integrated into the landscaping within the public spaces for non-residents).
- 8.69 Transport for London support the number of cycle and car parking spaces proposed. An appropriate condition is recommended to ensure that the cycle spaces are satisfactory.

Public Transport

- 8.70 The site is well served by public transport and has a public transport accessibility level (PTAL) of 5. The GLA note that the high density proposed is above those set out in Table 4B.1 of the

London Plan. TfL will seek contributions towards transport improvements to compensate for this. TfL have determined that contributions for transport infrastructure improvements are required via the S106 agreement to ensure that the development can be accommodated within the transport network.

Servicing and Refuse Provisions

- 8.71 Servicing for each of the residential buildings would be minimal. The retail and office units will be serviced using light goods vehicles at the entry/ exit provided from the controlled access on Westferry Road.
- 8.72 The waste strategy is the same as with the consented scheme, which is acceptable to the Cleansing Department. There will be a proportional increase in the number of bins, all of which will be stored in the basement. The proposal will provide 68 non-recyclable waste bins and 35 recyclable waste bins. All types of recyclable waste will be collected in the 35 bins and sorted off site by the Council. The development allows space for 12 extra bins in case more provision is needed. Commercial waste will be stored separately.
- 8.73 It is recommended that a condition be included to ensure the adequate provision of storage of refuse and recycling facilities.

Access and Inclusive Design

- 8.74 As with the consented scheme, the proposal complies with the London Plan, Policy HSG8 of the UDP and Policy HSG9 of the emerging LDF in terms of inclusive design. The central plaza overcomes the 3-metres height difference of the site with sloping surfaces at a gradient shallower than 1:20. Stairs within the central space have been limited to one flight. All dwellings are designed to 'Lifetime Homes' standards and 10% of the dwellings are wheelchair accessible. The development includes 19 disabled car parking spaces.

Sustainable Development/ Renewable Energy

- 8.75 Policy DEV6 of the emerging LDF Core Strategy Document requires that all new development should incorporate energy efficiency measures. The proposal includes a number of renewable energy mechanisms, including biomass heating plant and CHP which will result in approximately 14% reduction in energy consumptions and 28% reduction in CO² emissions.
- 8.76 The GLA make the following comments:

The application contains measures to reduce carbon dioxide emissions beyond 2006 Building Regulations requirements, which includes energy efficient design reductions of 8% and further reductions through a district heating system led by a combined heat and power system. This will incorporate biomass boilers to reduce emissions by 12% once energy efficiency measures have been accounted for.

Nevertheless, the applicant has been asked by GLA officers to address outstanding issues in relation to the size of the combined heat and power and the use of mechanical cooling, given the proposed uses.

The applicant has undertaken to investigate if the Barkantine energy center can be used or upgraded to serve the energy demands of 22 Marsh Wall. The Barkantine plant contains a CHP engine, two gas fired boilers and two thermal stores and already serves several developments in the area.

- 8.77 The GLA have indicated that this issue has not been solved and discussions with the applicant are being undertaken. Whilst agreed measures should be secured by the Council as part of any planning permission, the GLA have advised that it would be acceptable for the Council to

present the application before the Strategic Planning Committee, as long as the energy strategy is agreed before the Stage II referral expires.

Biodiversity

8.78 The application site is within the core range of the black redstart which is a bird specially protected under Schedule 1 of the Wildlife & Countryside Act 1981 (as amended) and is a priority species in the London Biodiversity Action Plan. The applicant has carried out a survey for black redstarts, which indicated that the site is not used by nesting black redstarts. However, there is an opportunity for biodiversity enhancements aimed at black redstarts, ensuring suitable foraging habitat is present on the site after the development is completed.

8.79 The GLA made the following comments:

“The consented development contained biodiversity-enhancing brown roofs on the top of blocks 3 and 4 (the two eight-storey blocks). The current application reduces these brown roofs by half to provide communal open space. The two types of spaces can coexist provided the human activity is directed away from the brown roofs. This can be done by using the lift core (as proposed) and other elements (for example dense shrubbery) to separate the spaces. The proposed brick wall separation might not be necessary, as it would prevent some visual amenity for the communal outdoor space

8.80 It is recommended that an appropriate condition be included to ensure that biodiversity roofs on Blocks 3 and 4 (eight storeys each) are provided to enhance opportunities for the nesting and foraging of black redstarts.

Planning Obligations

8.81 An analysis of the impacts of the development on the locality has been undertaken. In keeping with the ODPM Circular 05/2005, a number of requirements for planning obligations have been identified to either:

- Prescribe the nature of the development (e.g. by requiring that a given proportion of the housing is affordable);
- Compensate for loss or damage caused by the development (e.g. loss of open space); or
- Mitigate the development’s impact (e.g. through increased public transport provision).

8.82 The identified planning obligations meet all of the following tests:

- (i) relevant to planning;
- (ii) necessary to make the proposed development acceptable in planning terms;
- (iii) directly related to the proposed development;
- (iv) fairly and reasonably related in scale in kind to the proposed development; and
- (v) reasonable in all other respects.

8.83 Refer to section 3.1 of the report for a summary of the Section 106 Heads of Term, which are generally provided proportionally to the increase of units to the approved scheme.

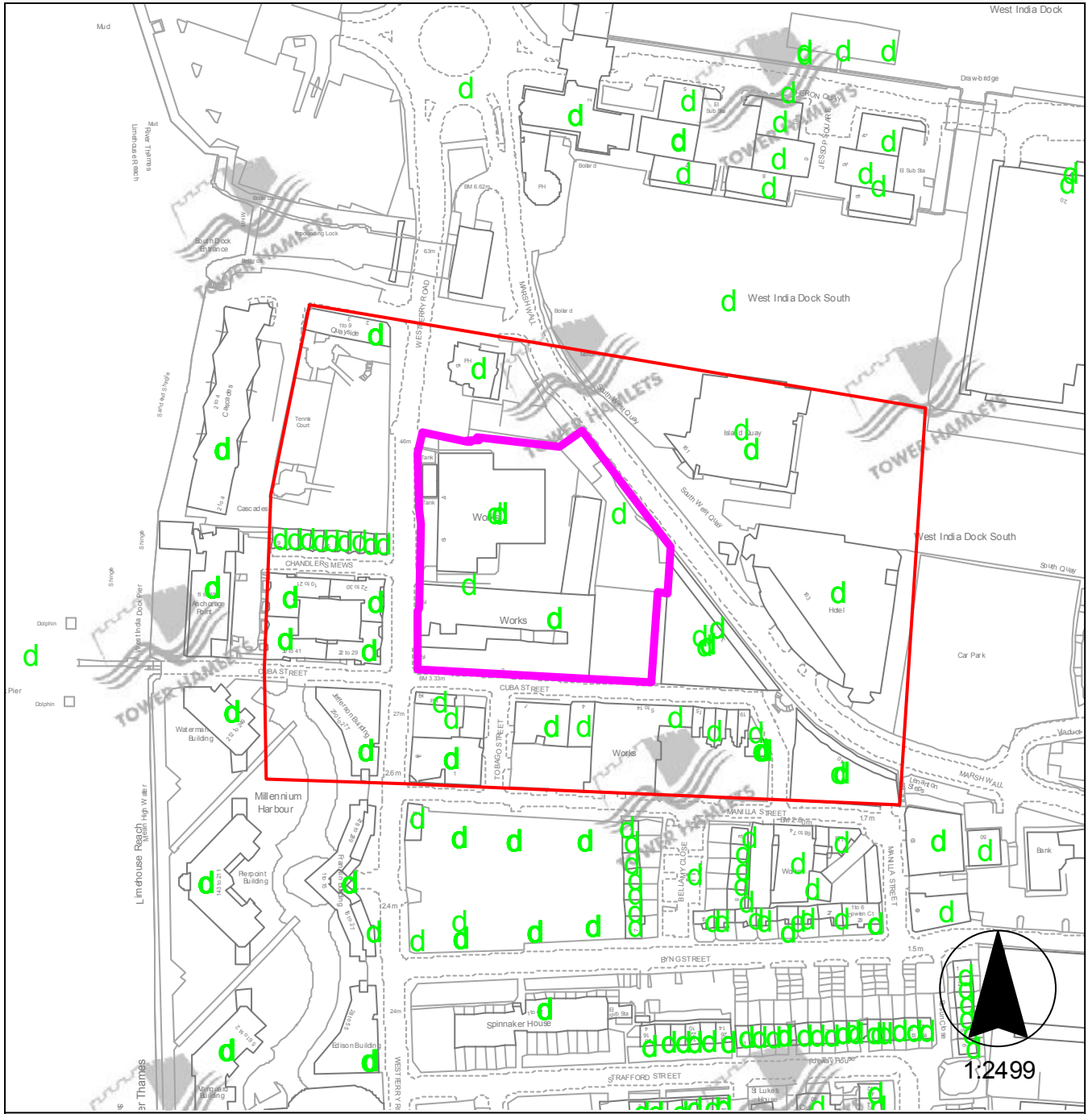
8.84 The above contributions are considered reasonable in order to address the impacts of the scheme and to address the GLA’s concern that *“providing there is sufficient open space for future residents and that there is an adequate social infrastructure, the very high density is not out of context”*.

9. Conclusions

9.1 All other relevant policies and considerations have been taken into account. Planning permission should be granted for the reasons set out in the SUMMARY OF MATERIAL PLANNING CONSIDERATIONS and the details of the decision are set out in the

RECOMMENDATION at the beginning of this report.

Site Map



Legend

- Planning Application Site Boundary
- Consultation Area
- d Land Parcel Address

This Site Map displays the Planning Application Site Boundary and the neighbouring Occupiers / Owners who were consulted as part of the Planning Application process. The Site Map was reproduced from the Ordnance Survey mapping with the permission of Her Majesty's Stationery Office © Crown Copyright. London Borough of Tower Hamlets LA086568

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