

Meeting of the

STRATEGIC DEVELOPMENT COMMITTEE

Thursday, 21 June 2007 at 7.30 p.m.

A G E N D A

VENUE

Committee Room, 1st Floor, Town Hall, Mulberry Place, 5 Clove
Crescent, London, E14 2BG

Members:	Deputies (if any):
Chair: Councillor Rofique U Ahmed	
Vice-Chair:	
Councillor Helal Abbas	Councillor Ohid Ahmed, (Designated Deputy representing Councillors Rofique U. Ahmed, Helal Abbas, Md. Shahid Ali, Sirajul Islam and Joshua Peck)
Councillor Louise Alexander	Councillor Shahed Ali, (Designated Deputy representing Councillors Shamim A. Chowdhury and Rania Khan)
Councillor M. Shahid Ali	Councillor Tim Archer, (Designated Deputy representing Councillor Simon Rouse)
Councillor Shamim A. Chowdhury	Councillor Alibor Choudhury, (Designated Deputy representing Councillors Rofique U. Ahmed, Helal Abbas, Md. Shahid Ali, Sirajul Islam and Joshua Peck)
Councillor Sirajul Islam	Councillor Stephanie Eaton, (Designated Deputy representing Councillor Louise Alexander)
Councillor Rania Khan	Councillor Motin Uz-Zaman, (Lead
Councillor Joshua Peck	
Councillor Simon Rouse	

Member, Health and Wellbeing)

[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, 21 June 2007

7.30 p.m.

1. ELECTION OF VICE-CHAIR

To elect the Vice-Chair of the Strategic Development Committee for 2007/08.

2. APOLOGIES FOR ABSENCE

To receive any apologies for absence.

3. 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
4. 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 10 th May 2007.	1 - 12	
5. RECOMMENDATIONS		
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 Corporate Director Development and Renewal along the broad lines indicated at the meeting.		
6. PROCEDURE FOR HEARING OBJECTIONS		
To NOTE the procedure for hearing objections at meetings of the Strategic Development Committee.	13 - 14	
7. DEFERRED ITEMS	15 - 16	
8. PLANNING APPLICATIONS FOR DECISION	17 - 18	
8 .1 13 to 20 Norton Folgate, 2 to 9 Shorditch High street, 5 to 11a Folgate Street, 12 to 17 & 10 Blossom Street, London E1	19 - 50	Spitalfields & Banglatown
8 .2 Olympics Applications	51 - 214	Bow East
8 .3 Alberta House, Gaslee Street, E Boyle Motor Engineering Ltd Site, Blackwall Way; and Brunswick Arms Public House, 78 Blackwall Way, London E14	215 - 244	Blackwall & Cubitt Town
8 .4 2 to 10 Bow Common Lane, London E14	245 - 268	Bromley-By- Bow
8 .5 Site south of Westferry Circus and west of Westferry Road, London	269 - 300	Millwall

LONDON BOROUGH OF TOWER HAMLETS

MINUTES OF THE STRATEGIC DEVELOPMENT COMMITTEE

HELD AT 7.30 P.M. ON THURSDAY, 10 MAY 2007

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

Members Present:

Councillor Ohid Ahmed
Councillor Alibor Choudhury (Vice-Chair)
Councillor Rupert Eckhardt
Councillor Abjol Miah
Councillor Ahmed Adam Omer
Councillor Joshua Peck

Other Councillors Present:

Councillor M. Mamun Rashid

Officers Present:

Megan Crowe – (Planning Solicitor, Legal Services)
Renee Goodwin – (Acting Applications Manager)
Michael Kiely – (Service Head, Development Decisions)
Graham White – (Legal Adviser)

Louise Fleming – Senior Committee Officer

1. APOLOGIES FOR ABSENCE

Apologies were received from Councillor Rofique Ahmed. Councillor Alibor Choudhury would be arriving late.

Therefore, in the absence of the Chair and Vice-Chair, the Committee RESOLVED that Councillor Josh Peck be elected Chair of the meeting.

2. DECLARATIONS OF INTEREST

Councillor Abjol Miah declared a personal interest in item 7.1 as the ward Member for Shadwell.

Councillor Rupert Eckhardt declared personal interests in item 7.2 as it was an important site on the Isle of Dogs and in item 7.3 as the ward Member for Millwall.

Councillor Josh Peck declared a personal interest in item 8 as Christ Church Gardens had previously received funding from his employer, the Heritage Lottery Fund.

3. UNRESTRICTED MINUTES

The minutes of the meeting held on 15th March 2007 were confirmed as a correct record by the Chair, subject to an amendment to the recommendation on item 6.2 relating to a contribution to the lighting of the towpath.

4. RECOMMENDATIONS

The Committee RESOLVED that, in the event of amendments to recommendations being made, the task of formalising the wording of any amendments be delegated to the Corporate Director Development & Renewal along the broad lines indicated at the meeting.

5. PROCEDURE FOR HEARING OBJECTIONS

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

6. DEFERRED ITEMS

The Committee noted the current position in relation to deferred items.

7. PLANNING APPLICATIONS FOR DECISION

7.1 John Bell House, 10 King David Lane, London

Mr Michael Kiely, Head of Development Decisions, introduced the site and proposal for the redevelopment to provide a 10 storey plus ground floor building comprising 132 bedroom student accommodation and landscaping at John Bell House, 10 King David Lane.

Mr Ron Osborne addressed the Committee on behalf of the residents in objection on the grounds of height, proximity to neighbouring properties, pollution, disruption and noise and disturbance from the student accommodation use.

Mr Stuart Black addressed the Committee on behalf of London Metropolitan University. He informed the Committee that the site was currently in use as student accommodation and that there was only one other facility in the Borough for the University, with a large number of students to house. He

believed the proposal would improve the current accommodation and security at the site.

Ms Renee Goodwin presented a detailed report and update report. She detailed the objections received and the conditions which would mitigate against the concerns raised. She advised the Committee that the Council's Conservation officers were satisfied with the design amendments to the scheme and did not believe it would have an adverse effect on the nearby St Paul's Church. Ms Goodwin outlined the issues for consideration and advised that the London Plan recognised the need for student accommodation across London. She emphasised that the use on the site had already been established, the proposal was to upgrade it.

Members asked questions relating to the Section 106 legal agreement and the demand for student accommodation in the Borough. Concern was expressed that there had been a number of similar applications and that Tower Hamlets should not be providing more than its share of student accommodation when there was a current housing shortage for its residents.

The Committee RESOLVED that planning permission for the redevelopment to provide a 10 storey plus ground floor building comprising 132 bedroom student accommodation and landscaping at John Bell House, 10 King David Lane be GRANTED 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:
 - a) Car Free Agreement
 - b) Preparation of a Green Travel Plan
 - c) Public realm improvements including footpath upgrade, signage and street furniture: £150,000
 - d) Transport improvements: £25,000
 - e) Use of Local Labour in Construction
 - f) TV reception mitigation measures
- C 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:
 - Elevational treatment including samples of materials for external fascia of building;
 - Ground floor public realm (detailed landscape plan for ground floor public realm improvements)
- 3) Student housing Management Plan required

- 4) Terrace use hours restriction
- 5) Archaeological investigation
- 6) 278 (Highways) agreement required for public realm works
- 7) Hours of construction limits (0800 – 1800, Mon-Fri, 0800 – 1300 Sat)
- 8) Details of insulation of the ventilation system and any associated plant required
- 9) Hours of operation limits – hammer driven piling (10am – 4pm, Mon – Fri)
- 10) Details required for on site drainage works
- 11) Full particulars of the refuse/recycling storage required
- 12) Code of Construction Practice, including a Construction Traffic Management Assessment required
- 13) Details of finished floor levels required
- 14) Details of surface water source control measures required
- 15) Biomass heating and renewable energy measures to be implemented
- 16) Black redstart habitat provision required
- 17) Land contamination study required to be undertaken
- 18) Any other condition(s) required necessary by the Head of Development Decisions.

Informatives

- 1) Environment Agency advice
 - 2) Site notice specifying the details of the contractor required
 - 3) Standard of fitness for human habitation, means of fire escape and relevant Building Regulations
- D That if by 10th August 2007 the legal agreement had not been completed to the satisfaction of the Chief Legal Officer, the Head of Development Decisions be delegated power to refuse planning permission.

(Councillor Alibor Choudhury arrived at 7.45 pm and therefore could not take part in the vote on this item.)

7.2 The London Arena, Limeharbour, London E14

Ms Renee Goodwin introduced the site and proposal for the redevelopment by the erection of 8 buildings 7 to 43 storeys to provide 149,381 sq m of floor space over a podium for use as 1057 residential units, 25,838 sq m of Class B1 (offices), a 149 room hotel; a 10,238 sq m apart-hotel; a Class D1/D2 community facility of 1,329 sq m, 2,892 sq m for use within Classes A1, A2, A3, A4 and A5, Class D2 health club of 1,080 sq m, associated car parking, landscaping including new public open spaces and a dockside walkway at the London Arena, Limeharbour.

Ms Goodwin presented a detailed report and update report. She outlined the amendments to the proposal from the previously approved scheme and advised the Committee of the response from the GLA in respect of affordable housing, which was optimum for the site. She detailed the issues for consideration and the conditions proposed.

Members asked questions relating to the financial contribution to medical facilities, the amount of affordable housing and the traffic congestion. Ms Goodwin informed the Committee that a contribution would be made to the Tower Hamlets PCT and the money would be allocated to areas of need. The percentage of family sized affordable housing had increased from the previous scheme and TfL had carried out a traffic assessment and was satisfied.

The Committee RESOLVED that planning permission for the redevelopment by the erection of 8 buildings 7 to 43 storeys to provide 149,381 sq m of floor space over a podium for use as 1057 residential units, 25,838 sq m of Class B1 (offices), a 149 room hotel; a 10,238 sq m apart-hotel; a Class D1/D2 community facility of 1,329 sq m, 2,892 sq m for use within Classes A1, A2, A3, A4 and A5, Class D2 health club of 1,080 sq m, associated car parking, landscaping including new public open spaces and a dockside walkway at the London Arena, Limeharbour be GRANTED 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:
 - a) A proportion of 35% on a gross floor space basis of the proposed units to be provided as affordable housing with the socially rented mix as specified in the table attached in Section 8.15.
 - b) Provide £150,000 towards the installation of Docklands Arrival Information System (DAISY) within the London Arena development.
 - c) Provide a minimum of £400,000 towards the D5 bus service or new bus service (TFL proposal) and potential new bus stops on East Ferry Road.
 - d) Implement measures to offset signal interruption to mitigate the adverse effects on DLR radio communications.
 - e) Provide £125,000 towards general improvements to pedestrian and cycle routes in the area including crossings and new paving surfaces.
 - f) Provide £75,000 towards the signalisation of the junction of Marsh Wall/ Limeharbour with a green man phase.
 - g) Provide £108,848 towards open space improvements to cater for the demand that will arise from the new housing on existing open space and recreational facilities.
 - h) Set of measures for the public realm including provision of the public piazza and access to the Dockside Walkway.
 - i) Provide £524,877 towards education to mitigate the demand of the additional population on education facilities.

- j) Provide £2,856,640 towards medical facilities to mitigate the demand of the additional population on medical facilities.
- k) Provide £125,000 towards the Local Labour in Construction (LliC) programme.
- l) Provide £75,000 towards Skillsmatch to maximise the employment of local residents.
- m) Preparation of a Workplace Travel Plan (including welcome pack for residents).
- n) Preparation of a Service and Delivery Plan.
- o) Obligations in relation to construction works (noise levels, hours of work, transport arrangements, air quality, method statements) to be secured through a Code of Construction Practice.
- p) TV Reception monitoring and mitigation
- q) Preparation and implementation of a public art strategy including involvement of local artists.
- r) Completion of a car free agreement to restrict occupants applying for residential parking permits.
- s) Preparation of an Environmental Management Plan – post construction.
- t) Provision of a health club incorporating a football pitch and associated facilities for community use.
- u) Further negotiation to provide the following to LDA's requests:
 - A portion of the business space to be provided as managed affordable workspace
 - Firming up and further developing initiatives to create training and employment opportunities for local people and businesses both during construction and within the completed development through the production of employment and training strategy.

C 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:
 - Elevational treatment including samples of materials for external fascia of building
 - Ground floor public realm (detailed landscape plan for amenity courtyards and ground floor public realm improvements)
 - Interface of retail areas with public space
 - Cycle parking design and location
 - The design of the lower floor elevations of commercial units including shopfronts and indoor football pitch
 - External lighting and security measures
- 3) Landscape Management Plan required
- 4) 278 agreement to be entered into for Highway works surrounding the site
- 5) Parking maximum cars and minimum cycle and motorcycle spaces

- 6) Hours of construction limits (0800 – 1800, Mon-Fri: 0800 – 1300 Sat)
- 7) Details of insulation of the ventilation system and any associated plant required
- 8) Hours of operation limits – hammer driven piling (10am – 4pm)
- 9) Details required for on site drainage works
- 10) Full particulars of the refuse/ recycling storage required
- 11) Code of Construction Practice, including a Construction Traffic Management Assessment required
- 12) Details of finished floor levels required
- 13) Details of surface water source control measures required
- 14) Renewable energy measures to be implemented
- 15) Black redstart habitat provision required
- 16) Green roofs
- 17) Land contamination study required to be undertaken
- 18) Signage for basement parking
- 19) Foundation design and ground works
- 20) Construction operations and impact on dock walls
- 21) Horizontal access strip from dock wall
- 22) Materials, openings and maintenance regime for boundary with DLR
- 23) Use of barges for construction traffic
- 24) Access by construction vehicles limited to Limeharbour
- 25) Limit A1 retail floorspace
- 26) Health club management plan required (to secure access for local people etc)
- 27) Recycling plan
- 28) Access and circulation
- 29) Amended plan indicating the location and number of disabled and cycle parking places.
- 30) Any other condition(s) considered necessary by the Head of Development Decisions.

Informatives

- 1) Environment Agency advice
 - 2) Site notice specifying the details of the contractor required
 - 3) Standard of fitness for human habitation, means of fire escape and relevant Building Regulations
 - 4) Landscape management plan
 - 5) Thames Water
 - 6) English heritage – London region
 - 7) Code of Practice for Works affecting British Waterways
 - 8) Entertainment licensing
 - 9) Control of Pollution Act
 - 10) Link the combined Heat and Power System with other nearby developments
- D That if by 10th August 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.

7.3 Arrowhead Quay (East of 163 Marsh Wall), Marsh Wall, London

Mr Michael Kiely, Head of Development Decisions, introduced the site and proposal for the redevelopment of site to provide a 16 storey and 26 storey plus plan (119m AOD to top of plant) office building including retail (Class A1)/ restaurant (Class A3) uses on part of the ground floor and basement car park (79,244 sq m gross), dockside walkway and landscaped plaza at Arrowhead Quay (East of 163 Marsh Wall), Marsh Wall.

Ms Renee Goodwin, Strategic Applications Manager, presented the report and update report on the application. She detailed the changes which had been made to the application since the previously approved application and outlined the main issues for the Committee to consider when making its decision.

The Committee RESOLVED that planning permission for the redevelopment of site to provide a 16 storey and 26 storey plus plan (119m AOD to top of plant) office building including retail (Class A1)/ restaurant (Class A3) uses on part of the ground floor and basement car park (79,244 sq m gross), dockside walkway and landscaped plaza at Arrowhead Quay (East of 163 Marsh Wall), Marsh Wall be GRANTED 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:
- A contribution of £50,000 to public art
 - A contribution of £4,971,376.62 in accordance with the Millennium Quarter Masterplan Tariff.
 - A contribution of £20,000 towards the provision of (Docklands Arrival Information System) boards at appropriate locations within the proposed development.
 - Contributions towards any equipment upgrade required to mitigate the adverse affects of this development on DLR's radio communications. Furthermore, a radio survey is to be conducted before and after the construction phase to assess the level of impact the development may have on the DLR radio signal.
 - The provision of a public walkway through the site as part of the east-west dockside walkway and a north – south link for the public piazza.
 - Commitment towards utilising employment initiatives such as the Local Labour in Construction (LliC) in order to maximise the employment of local residents.
 - TV reception monitoring and mitigation.
 - Environmental Management Plan

- Restrictions on Additional Floorspace
- Preparation of a Travel Plan

A Section 278 agreement to secure the following:

Associated highways works to the frontage along Marsh Wall and the area under public ownership across the junction with Admirals Way.

C 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. Details of the following are required:
 - Samples of all building materials;
 - The design of the lower floor elevations, including shopfronts;
 - Signage strategy;
 - External lighting;
 - Design of new plaza area and all other landscaping, including details of the extent of outdoor seating associated with potential café/restaurant uses;
 - Details of glazing (including acoustic performance) for all external sensitive facades by DLR train noise;
 - Public art/craft; and
 - The provision to be made for the storage and collection/disposal of rubbish.
3. Landscape Management Plan.
4. Completion of the restaurant/retail units prior to occupation of any other part of the development.
5. Archaeological investigation.
6. Full details of access for people with disabilities
7. The following parking spaces are to be provided:
 - A maximum of 48 car parking spaces of which 5 have been allocated for disabled drivers
 - A minimum of 266 cycle spaces at basement level for the office accommodation and 20 at ground level for the retail units and office visitors
 - 90 motorcycle spaces
8. Limit hours of construction to between 8.00 Hours to 18.00 Hours, Monday to Friday and 8.00 Hours to 13.00 Hours on Saturdays.
9. Level of noise emitted from the site to be restricted.
10. Ground borne vibration limits.
11. Limit hours of power/hammer driven piling/breaking out to between 10.00 Hours to 16.00 Hours, Monday to Friday.
12. Details of route for construction traffic.
13. Details of on-site parking and delivery arrangement during construction stage
14. Environmental Management Plan.

15. Details of a monitoring and control regime of the Environmental Management Plan.
16. Investigation and remediation measures for land contamination (including water pollution potential).
17. Details of the construction of the site foundations.
18. Details of surface and foul water drainage system required.
19. Impact study of water supply infrastructure required.
20. Details of Water Efficiency measures.
21. Details required for surface water drainage works.
22. Details required for surface water source control measures.
23. A strip of land 6 metres wide to preserve access to the watercourse for maintenance and improvement.
24. Assessment to identify the life of the river wall, compared to the life of the development
25. Implementation of a biodiversity measures as submitted, including green roof.
26. Renewable energy measures to be approved in writing by the Local Planning Authority in consultation with the Greater London Authority and implemented in perpetuity.
27. During construction no solid matter shall be stored within 10 metres of the banks of the West India Dock South and thereafter no storage of materials shall be permitted in this area.
28. Details of access strip to preserve access to the watercourse for maintenance and improvement shall be submitted and approved in writing by the Local Planning Authority prior to commencement of development. The development shall not be carried out otherwise than in accordance with the details so approved.
29. Any other condition(s) considered necessary by the Head of Development Decisions.

Informatives

1. Section 106 agreement required
2. Section 278 (Highways) agreement required
3. Site notice specifying the details of the contractor required
4. Construction Environmental Management Plan Advice
5. Use of dock to transport bulky materials
6. London City Airport Advice
7. Conditions 2(a), (b) and (e) to comply with microclimate and ecological studies and the remedial measures in the Environmental statement
8. Environment Agency Advice
9. British Waterways Advice
10. Environmental Health Department Advice
11. Transport Department Advice
12. Metropolitan Police Advice
13. DLR advice
14. Advertising signs and/or hoardings consent
15. Contact the GLA regarding the energy proposals
16. Any other informative(s) considered necessary by the Head of

Development Decisions

- D That, if by 10th August 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.

8. BISHOPS SQUARE S106 PLANNING OBLIGATIONS ALLOCATION FOR DECISION

Mr David Williams, Development Manager, presented a detailed report on the allocation of S106 monies from the Bishops Square development. The development, which had been completed in 2005, had generated a £8,580,377 financial contribution to be spent in accordance with the legal obligations detailed in the Section 106 legal agreement.

The Committee considered the list of projects for the S106 monies, which had been recommended by the Planning Contributions Overview Panel. Mr Williams explained that the Panel had consisted of officers representing each area of the Council and each had identified priorities for the Borough. Members asked a number of questions relating to the process of consultation and the specific projects recommended.

The Committee RESOLVED that

- (i) the project list, attached as Appendix 1 to the Committee report be approved;
- (ii) the Boundary extension indicated to enable resources to support projects recommended by PCOP which are outside the original s106 boundary, as shown on Plan 1 attached to the Committee report, be approved;
- (iii) the completion of the negotiation of a Deed of Variation to the existing s106 legal agreement, to the satisfaction of the Chief Legal Officer, to secure the boundary extension and any other variations required to allow allocation in line with the project list and subsequent re-allocations be approved;
- (iv) that the Corporate Director of Development and Renewal be authorised to amend project allocations and/or identify new projects, in relation to issues such as the following:
 - the re-allocation of any outstanding funds or resources not able to be spent if the intended s106 variation cannot be agreed;
 - additional boundary changes to secure the Deed of Variation negotiations;
 - any re-allocation if projects cannot ultimately go-ahead; and
 - allocation of any additionally accumulated interest.

The meeting ended at 8.23 p.m.

Chair, Councillor Rofique U Ahmed
Strategic Development Committee

DEVELOPMENT COMMITTEE STRATEGIC DEVELOPMENT COMMITTEE

PROCEDURES FOR HEARING OBJECTIONS AT COMMITTEE MEETINGS

Provisions in the Council's Constitution (Part 4.8) relating to public speaking:

- 6.1 Where a planning application is reported on the "Planning Applications for Decision" part of the agenda, individuals and organisations which have expressed views on the application will be notified by letter that the application will be considered by Committee at least three clear days prior to the meeting. The letter will explain these provisions regarding public speaking.
- 6.2 When a planning application is reported to Committee for determination the provision for the applicant/supporters of the application and objectors to address the Committee on any planning issues raised by the application, will be in accordance with the public speaking procedure adopted by the relevant committee from time to time (see below).
- 6.3 All requests to address a committee must be made in writing or by email to the committee clerk by 4pm on the Friday prior to the day of the meeting. This communication must provide the name and contact details of the intended speaker. Requests to address a committee will not be accepted prior to the publication of the agenda.
- 6.4 After 4pm on the Friday prior to the day of the meeting the Committee clerk will advise the applicant of the number of objectors wishing to speak.
- 6.5 The order of public speaking shall be as stated in Rule 5.3, which is as follows:
 - An objector who has registered to speak
 - The applicant/agent or supporter
 - Non-committee member(s) may address the Committee for up to 3 minutes
- 6.6 Public speaking shall comprise verbal presentation only. The distribution of additional material or information to members of the Committee is not permitted.
- 6.7 Following the completion of a speaker's address to the committee, that speaker shall take no further part in the proceedings of the meeting unless directed by the Chair of the Committee.
- 6.8 Following the completion of all the speakers' addresses to the Committee, at the discretion of and through the chair, committee members may ask questions of a speaker on points of clarification only.
- 6.9 In the interests of natural justice or in exceptional circumstances, at the discretion of the chair, the procedures in Rule 5.3 and in this Rule may be varied. The reasons for any such variation shall be recorded in the minutes.
- 6.10 Speakers and other members of the public may leave the meeting after the item in which they are interested has been determined.

Public speaking procedure adopted by this Committee:

- 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).
- 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.
- 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 recommendation. 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.

This page is intentionally left blank

Agenda Item 7

Committee: Strategic Development	Date: 21 st June 2007	Classification: Unrestricted	Agenda Item No: 7
Report of: Corporate Director of Development and Renewal		Title: Deferred items	
Originating Officer: Michael Kiely		Ref No: See reports attached for each item	
		Ward(s): See reports attached for each item	

1. INTRODUCTION

- 1.1 This report is submitted to advise the Committee of planning applications that have been considered at previous meetings and currently stand deferred. The following items are in that category:

Date deferred	Reference number	Location	Development	Reason for deferral
18/1/07	PA/02/01555	News International site at the south east junction of the Highway and Vaughan Way, London E1	Erection of two buildings of 10 and 27 storeys to create 115,388 sq. m floor space for Class B1 (Offices), 1,419 sq. m A1 (Shop), 913 sq. m A3 (Cafe and restaurant) and 1,200 sq. m D2 (Assembly and leisure), together with new access and servicing arrangements, car parking for up to 650 cars, lorry marshalling area & landscaping works.	To enable officers to carry out further consultations with local residents.

2. CONSIDERATION OF DEFERRED ITEMS

- 2.1 Deferred applications may be reported in the Addendum Update Report if they are ready to be reconsidered by the Committee. This report is available in the Council Chamber 30 minutes before the commencement of the meeting.

3. RECOMMENDATION

- 3.1 The Committee to note the current position relating to deferred items.

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	✓	Eileen McGrath (020) 7364 5321

This page is intentionally left blank

Agenda Item 8

Committee: Strategic Development	Date: 21 st June 2007	Classification: Unrestricted	Agenda Item No: 8
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 8.1

Committee: Strategic Development	Date: 21 st June 2007	Classification: Unrestricted	Agenda Item No: 8.1
Report of: Corporate Director of Development and Renewal		Title: Planning Application for Decision	
Case Officer: Tim Porter		Ref No: PA/06/02333 and PA/06/02334	
		Ward(s): Spitalfields and Banglatown	

1. APPLICATION DETAILS

Location: 13 to 20 Norton Folgate, 2 to 9 Shoreditch High Street, 5 to 11a Folgate Street, 12 to 17 & 10 Blossom Street, London, E1

Existing Use: Residential, office, shops, café, pub, motor transport depot (vacant) and warehousing space (vacant)

Proposal: PA/06/02333

Full planning permission is sought for the redevelopment by the erection of buildings between 4 storeys and 10 storeys plus plant (43 metres), and retention and conversion of a selection of existing buildings, to provide a mixed use development to contain 8 residential units (1 x studio flat, 1 x 1-bed flat and 4x 2-bed flats and 2 x 3-bed flat), 22,387sq.m of B1 (Office) (1,336sq.m of which are small/medium enterprise units), 1,622sq.m of A1 (Retail) and A3 (Restaurant and Café) and 595sq.m of A4 (Public House), with associated open space and servicing (PA/06/02333)

PA/06/020334

The scheme is proposing to demolish 13-20 Norton Folgate, 2-9 Shoreditch High Street and 10, 16 and 17 Blossom Street.

Drawing Nos: 05087-P-X-SIT, 05078-P-X-GAX-LG, 05087-P-X-GAX-00, 05087-P-X-GAX-01, 05087-P-X-GAX-02, 05078-P-X-GAX-03, 05087-P-X-ELX-01, 05078-P-X-DGA-LG, 05087-P-X-DGA-00, 05087-P-X-DGA-01, 05087-P-X-DGA-02, 05078-P-X-DGA-03, 05087-P-X-GA-LG, 05087-P-X-GA-00 rev B, 05087-P-X-GA-01 rev A, 05087-P-X-GA-02 rev A, 05087-P-X-GA-03 rev A, 05087-P-X-GA-04 rev A, 05087-P-X-GA-05, 05087-P-X-GA-06, 05087-P-X-GA-07, 05087-P-X-GA-08, 05087-P-X-GA-09, 05087-P-X-GA-10, 05087-P-X-GA-RF, 05087-P-C-GA-00 rev A, 05087-P-A-EL-01 rev A, 05087-P-A-EL-02 rev A, 05087-P-B-EL-01 rev A, 05087-P-D-EL-01, and 05087-P-C-EL-01 rev A

Applicant: Mayor and Commonality and Citizens of the City of London c/o Planning and Regeneration Ltd

Owner: City of London
High Park Properties Limited
M Bardiger Limited

Historic Building: Locally Listed Buildings

Conservation Area: Elder Street Conservation Area

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		Eileen McGrath 020 7364 5321

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, the Council's emerging Local Development Framework Submission Document, associated supplementary planning guidance, the London Plan and Government Planning Policy Guidance and has found that:

- a) The site is a preferred office location. The scheme meets the Mayor and Councils' strategic need for suitable office floorspace within the City Fringe;
- b) The scheme will preserve and enhance the character of the Elder Street Conservation Area;
- c) The scheme will provide a number of land use, conservation and design benefits.
- d) The development would add positively to London's skyline without causing detriment to local or strategic views;
- e) It is considered that the development 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, noise, and hours of construction; and
- f) The proposal incorporates a number of sustainability measures.

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 contribution of £1,057,125 to be distributed accordingly towards the following:
2. Financial contribution of £262,467 towards employment initiatives such as skills match, as well as partnering with Local Labour in Construction (LLiC), in order to maximise the employment of local residents;
3. Financial contribution towards public art, which should incorporate any important archaeological finds on site;
4. Financial contribution towards improvements works to the public realm surrounding the site to mitigate any potential impacts the scheme may have on the Elder Street Conservation Area;
5. Financial contribution to TfL towards pedestrian and cycling improvements along Bishopsgate;
6. Financial contribution to TfL towards local bus stop accessibility improvements;
7. Financial contribution to TfL towards London Underground Liverpool Street Station improvements;
8. Preparation of a right of way "walking agreement" for crossing through the proposed site

across all areas of public realm created by the proposal;

9. Preparation of a Travel Plan;
10. Car Free Agreement;
11. Servicing and Refuse Strategy agreement; and
12. TV reception monitoring and mitigation.

That the Head of Development Decisions has delegated power to impose conditions on the planning permission to secure the following:

Conditions

1. Permission valid for 3 years;
2. Details of the following are required:
 - Samples of materials for external fascia of building;
 - Ground floor public realm;
 - All external landscaping (including lighting and security measures), walkways, screens/ canopies, entrances, seating and litter bins (note: night dimming of perimeter lights is required to protect the residential dwellings bordering the development from adverse ambient lighting effects);
 - The design of the lower floor elevations of commercial units including shopfronts;
 - Signage strategy;
 - Public art/craft;
 - The storage and collection/disposal of rubbish; and
 - Glazing for the residential units to mitigate noise
3. Landscape Management Plan;
4. Archaeological investigation;
5. All residential accommodation to be built to Lifetime Homes standard, including at least 10% of all housing being wheelchair accessible;
6. The following parking spaces are to be provided
 - 2 service bays
 - 1 disable parking space
 - 131 cycle spaces
7. Limit hours of construction to between 8.00 Hours to 18.00 Hours, Monday to Friday and 8.00 Hours to 13.00 Hours on Saturdays;
8. Details of insulation of the ventilation system and any associated plant required;
9. Ground borne vibration limits;
10. Limit hours of power/hammer driven piling/breaking out to between 10.00 Hours to 16.00 Hours, Monday to Friday;
11. Details of route for construction traffic;
12. Details of on-site parking and delivery arrangement during construction stage;
13. Environmental Management Plan;
14. Investigation and remediation measures for land contamination;
15. Full particulars of the following
 - Surface/ foul water drainage plans/ works; and
 - Surface water control measures;
16. Renewable energy measures to be approved in writing by the Local Planning Authority in consultation with the Greater London Authority and implemented in perpetuity;
17. Details of the proposed A4 use, including obscure glazing (minimise impacts on the privacy of residents to the south), noise, fume extractors, and hours of operation;
18. Details of the proposed A1/A3 uses, including delivery hours and hours of operation;
19. Details of any extract system for the A3 uses;
20. Full details of the restoration of the retained buildings;

21. 278 agreement to be entered into for Highway works surrounding the site;
22. Any other condition(s) considered necessary by the Head of Development Decisions

Informatives

1. Section 106 agreement required
2. Section 278 (Highways) agreement required
3. Site notice specifying the details of the contractor required
4. Construction Environmental Management Plan Advice
5. Environment Agency Advice
6. Environmental Health Department Advice
7. Transport Department Advice
8. Advertising signs and/or hoardings consent
9. Contact the GLA regarding the energy proposals.
10. English Heritage Advice
11. Thames Water Advice
12. Scheduled Ancient Monument consent
13. Any other informative(s) considered necessary by the Head of Development Decisions

That the Head of Development Decisions is delegated power to impose conditions on the conservation area consent to secure the following:

1. Time limit
 2. Operation hours
 3. Associated planning permission
- 3.3 That, if by 21st 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 Planning permission and conservation area consent is being sought for a development comprising a blend of redevelopment, retention and conversion of existing buildings to provide a 4 to 10-storey mixed use development containing B1 offices, SME accommodation, A1 retail, A3 restaurant, and A4 public house floorspace, 8 residential units and associated open space.
- 4.2 The proposal includes the following:
- Retention and conversion of Nicholls and Clarke warehouses on the west side of Blossom Street to offices;
 - Demolition and redevelopment of existing office building at 16/17 Blossom Street;
 - Retention and conversion of the locally listed Arts and Craft building on the corner of Folgate Street and Blossom Street to residential and A4 use;
 - Demolition and redevelopment of buildings on Norton Folgate/Shoreditch High Street to provide A1/A3 and B1 uses
 - Creation of expanded public realm
 - Demolition and redevelopment of Depot site on the corner of Blossom Street and Fleur-de Lis Street to provide new B1 office building.

Site and Surroundings

- 4.3 The application site is located within the Elder Street Conservation Area, which was originally designated in 1969 and comprised an area centred on the surviving Georgian houses in

Elder Street and Folgate Street. The Conservation Area was extended in 1976 which took in the commercial area west of Blossom Street and north of Fleur de Lys Street, as well as the fringe of the Spitalfields Market area to the south of Folgate Street.

- 4.4 The Conservation Area is predominantly 3-4 storeys high with 3-storey Georgian houses in the core of the area. The buildings along Commercial Street are more substantial at 5-6 storey buildings. However, the subject site lies within an area which is undergoing a considerable amount of change. The historic character of the area has been affected by large scale office development to the south along the Bishopsgate corridor and Spitalfields Market which contains buildings of more than 12 storeys.
- 4.5 Also, to the west of Norton Folgate is 201 Bishopsgate, a 35 storey office redevelopment which is currently under construction. To the north beyond Commercial Street lies Bishopsgate Goodsynd, which is expected to come forward for higher-rise development over the next few years.
- 4.6 The application site contains two separate land parcels. The principle site is the Nicholls and Clarke site, a rectangular plot measuring approximately 3,888sqm and is bounded by Fleur-de Lis Street (north), Folgate Street (south), Blossom Street (east) and Norton Folgate and Shoreditch High Street (west). The smaller depot plot, which measures approximately 479sqm, lies immediately to the north east corner of the principle site at the junction of Blossom Street and Fleur-de Lis Street.
- 4.7 The site includes a miscellaneous array of buildings including:
- The vacant Nicholls and Clarke showrooms that occupy the Shoreditch High Street frontage to the north
 - The vacant Nicholls and Clarke Warehouses fronting Blossom Street built between 1866 and 1914;
 - The vacant 1950's motor transport depot;
 - A non-descript 1950s commercial building at 16/17 Blossom Street;
 - The locally listed Arts and Crafts building built between 1866 and 1914 on the corner of Blossom Street and Folgate Street, which contains B1 and A4 uses; and
 - The group of commercial units fronting Norton Folgate of various design and age dating from the 18th century up to early 20th century.
- 4.8 Finally, the site is located within an area defined as a Scheduled Ancient Monument, being part of the precinct of the Priory and Hospital of St Mary Spital.

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:		Central Area Zone Special Policy Area (SPA) where a diverse and balanced mix of use is to be maintained Area of archaeological importance potential Strategic view consultation area
Policies:	DEV1 DEV2 DEV3 DEV4 DEV5 DEV 7	Design Requirements Environmental Requirements Mixed Use development Planning Obligations High Buildings and Views Strategic View

DEV12	Provision of Landscaping in Development
DEV18	Art and Development Proposals
DEV25	Preserving Conservation Areas
DEV26	Development in Conservation Areas
DEV28	Demolition in Conservation Areas
DEV32	Locally Listed Buildings
DEV39	Setting of Listed Building
DEV42	Nationally Important Ancient Monuments
DEV44	Preservation of Nationally Important Ancient Monuments
DEV45	Ground Works in Areas of Archaeological Importance
DEV50	Noise
DEV55	Development and Waste Disposal
CAZ1	Developing London's regional, national and international role
CAZ3	Mixed use development
CAZ4	Diversity, character and functions of the Central Area Zones
EMP1	Encouraging New Employment Uses
EMP2	Retaining Existing Employment Uses
EMP8	Small Business
EMP9	Business Use
HSG1	Housing Targets
HSG2	New Housing Development
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
T18	Pedestrians
T19	Pedestrians
T21	Pedestrians
T23	Cyclists
S6	New Retail Development
S7	Public House
S10	New Shopfronts
S12	Residential Above Ground Floor Shops

Emerging Local Development Framework

Proposals:	CF4	Employment (B1), Residential (C3) and Retail (A1, A2, A3, and A4) CAZ Scheduled Ancient Monument Conservation Area Archaeological Priority Area Strategic View Consultation Area
Policies	IMP1 CP1 CP2 CP3 CP4 CP5 CP7 CP8 CP9	Planning Obligations Creating Sustainable Communities Equal Opportunity Sustainable Environment Good Design Supporting Infrastructure Job Creation and Growth Central Activities Area Small Business

CP11	Sites in Employment Use
CP15	Range of Shops
CP19	New Housing Provision
CP20	Sustainable Residential Density
CP21	Dwelling Mix
CP25	Housing Amenity Space
CP30	Improving the Quality and Quantity of Open Space
CP38	Energy Efficiency and Production of Renewable Energy
CP39	Sustainable Waste Management
CP41	Integrating Development with Transport
CP42	Streets for People
CP46	Accessible and Inclusive Environments
CP47	Community Safety
CP48	Tall Buildings
CP49	Historic Environment
CP50	Important Views
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
EE2	Redevelopment /Change of Use of Employment Sites
HSG1	Determining Residential Density
HSG2	Housing Mix
HSG7	Housing Amenity Space
HSG9	Accessible and Adaptable Homes
CON2	Conservation Area
CON4	Archaeology and Ancient Monuments
CON5	Protection and Management of Important Views
CFR1	Spatial Strategy
CFR2	Transport and Movement
CFR5	Open Space
CFR6	Infrastructure and Services
CFR7	Infrastructure Capacity
CFR8	Waste
CFR9	Employment uses
CFR10	Residential Uses
CFR11	Retail and Leisure
CFR12	Design and Building Form
CFR13	Connectivity
CFR14	Site Allocations

Supplementary Planning Guidance/Documents

Designing Out Crime
Residential Space
Landscape Requirements

Spatial Development Strategy for Greater London (London Plan)

3A.1	Housing Supply
3A.4	Housing Choice
3A.7	Affordable Housing Target
3B.1	Developing London's Economy
3B.2	Office Demand and Supply
3B.3	Office Provision
3B.4	Mixed Use Development
3C.1	Integrating Transport and Development
3C.22	Parking
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
4B.9	Large scale buildings, design and impact
4B.10	Built Heritage

Government Planning Policy Guidance/Statements

PPS1	Delivering Sustainable Development
PPS3	Housing
PPG13	Transport
PPG15	Planning and the Historic Environment
PPS22	Renewable Energy
PPG24	Planning & Noise

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

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 Cleansing

6.2 No comment

LBTH Corporate Access Officer

- 6.3 Use of revolving doors in combination with pass door is not inclusive. The justification for their use should be contained in the Access Statement.

LBTH Education

- 6.4 No contribution is required.

LBTH Environmental Health

Contaminated land

- 6.5 The scheme should be appropriately condition.

Air Quality

- 6.6 A risk assessment should be conducted for the construction stage of the site. Once a score is obtained a Code of Construction Practice should be submitted to the Air Quality Officer and agreed with LBTH.

Noise

- 6.7 The noise report is considered acceptable. The proposed mitigation measures for residential and offices are acceptable. Confirmation that secondary glazing will be installed for the residential element is required. We would also like confirmation as to how natural ventilation will be provided to both the residential and office premises.
- 6.8 The criteria for building services plant are not acceptable as LBTH requirement is the level of noise emitted from a new plant should be at least 10dB(A) lower than the lowest measured background noise. This is to prevent background creep.

LBTH Highways

- 6.9 The development provides no parking spaces on site. This is considered acceptable.
- 6.10 The developer will be required to enter a section 106 car free agreement.
- 6.11 In order to mitigate the impact of an increase in pedestrian numbers and associated trips, a travel plan will be required.
- 6.12 The cycle parking provision is below the standards set out in the LDF and should be increased accordingly.
- 6.13 The developer has indicated the position of refuse storage and this appears to be within operational parameters.
- 6.14 A section 278 agreement is required to include footways and kerbs surrounding the site and the highway adjacent to the site. The service entrance must also accommodate drop kerbs as well as tactile paving on both sides of the crossover.
- 6.15 In order to mitigate the impact of increased pedestrian movement, improved pedestrian access and promote sustainable transport options, it is recommended that 106 requirements include:
- Contribution towards planned footway and public realm improvements to Folgate Street and Fleur De Lis Street (OFFFICER COMMENT: A financial contribution has been secured).

- Contribution to existing and proposed cycle route initiatives that will provide improved cycle access from east to west (OFFICER COMMENT: According to the emerging LDF, the Conservation Area is not identified as containing dedicated cycle routes. Accordingly, this request is considered to be unreasonable).

LBTH Housing

- 6.16 CP22 of the LDF seeks to maximise the affordable housing contribution from each site, including smaller ones, and the developer should be asked to demonstrate that he can't provide any affordable units, or financial contributions if this is not appropriate through use of the toolkit (OFFICER COMMENT: This interpretation of CP22 is incorrect. Affordable housing is only required on schemes above 10 dwelling units).
- 6.17 Within the private mix, I note that there is no family accommodation proposed, and consideration should be given to whether 3-bed family accommodation could be provided (OFFICER COMMENT: The applicant has amended the scheme, which now proposes 2 x 3-bed units).
- 6.18 The private units should be conditioned to provide lifetime homes and 10% wheelchair accessible provision.

LBTH Landscape

- 6.19 No comment.

English Heritage (Statutory)

- 6.20 English Heritage made no objection to the proposal, though raised a number of minor concerns:
- 6.21 The unlisted warehouses (no.s 12 – 15 Blossom Street) make a significant contribution to the character and appearance of the Elder Street Conservation area. The additional storey as proposed should be setback from the street frontage in order to minimise their impact (OFFICER COMMENT: The applicant has amended the scheme accordingly and the changes have been accepted by English Heritage).
- 6.22 If planning approval is granted, the scheme should be conditioned to ensure that full restoration of the retained buildings on the site is carried out.
- 6.23 A Section 106 agreement should be attached to any permission in order to ensure the cement asphalt pavements in Blossom Street and Norton Folgate are brought up to the standard of those in the remainder of the Elder Street Conservation Area.

English Heritage – Archaeology (Statutory)

- 6.24 No objection subject to appropriate conditioning.

Environment Agency (Statutory)

- 6.25 No objection subject to appropriate conditioning and informatives.

Greater London Authority (Statutory)

- 6.26 The GLA comments have been addressed in detail later in this report

Transport for London (Statutory)

- 6.27 TfL support the scheme, the response is summarised below
- 6.28 The trip generation assessment is acceptable.
- 6.29 One car parking bay or a car based access/drop-off point designated for disabled use is to be provided.
- 6.30 TfL welcomes the submission of the Travel Plan which should be secured, enforced, monitored and reviewed as part of the Section 106 agreement.
- 6.31 The original cycle parking spaces proposed did not comply with TfL's Cycle Parking Standards. However, the applicant has amended the scheme to provide 131 spaces, which is considered acceptable.
- 6.32 The servicing management strategy is welcomed. TfL supports the proposal to service the development off-street. The upper limit on the size of vehicles servicing the site, including refuse collection, as recommended in the servicing management strategy is accepted.
- 6.33 A financial contribution to fund streetworks and public transport improvements is requested. Also a contribution to mitigate the cumulative impact on public transport in the vicinity and major interchanges is requested.

Ancient Monument Society

- 6.34 No comment

BBC

- 6.35 The issue of television and radio reception for nearby residents is not mentioned in the application. Though the BBC would like to see this matter considered, they suspect the actual impact to be small, owing to the development not incorporating any particular tall buildings.

British Archaeology Society

- 6.36 No comment

CABE

- 6.37 CABE consider the scheme to be "*a well considered and well designed project*" and they are happy to offer their support.

Corporation of London

- 6.38 No comment.

Crime Prevention Officer

- 6.39 There are no concerns regarding the layout or build design.

Georgian Group

- 6.40 They object to the application. The Georgian Group take the view that the proposal is inappropriate in its scale and would recommend that any new development should respect the height of the existing buildings on the application site and more particularly those in the Elder Street Conservation Area. In this way the relationship between the design and scale of

the buildings on Bishopsgate would sit more harmoniously with the historic area around Elder Street, thus maintaining a clear sense of streetscape, history and evolution.

London Borough of Hackney

6.41 No comment

London Fire and Civil Defence Authority

6.42 No comment

Thames Water Utilities

6.43 Recommended a number of conditions and informatives to ensure that foul and/ or surface water discharge from the site does not prejudice the existing sewerage system.

The Society for the Protection of Ancient Buildings

6.44 Concerned about the scale and height of proposed development, and about the loss of buildings to Shoreditch High Street. At present, the row of traditional buildings facing Shoreditch high Street contrasts with the scale of those in Bishopsgate and marks the northern boundary of the City. Though they are not of great individual interest, they are considered to make a positive contribution to the character of the conservation area. The scheme should not be approved.

The Spitalfields Society

6.45 Object to the proposal for the following reasons:

- Limited number and variety of retail, commercial and residential units;
- Loss of day light to individual properties and the conservation area in general arising from the overall scale of the proposal.

Twentieth Century Society

6.46 No comment

Victorian Society

6.47 The Victorian Society welcomes the proposal to retain and refurbish the Victorian warehouses on Blossom Street as well as the 'Arts and Crafts' buildings at 5 – 11a Folgate Street, both of which would make a positive contribution to the character of the Elder Street Conservation Areas.

6.48 They are concerned however that the current proposal would continue the gradual erosion of historic character in this part of Shoreditch and consider that the development is grossly over-scaled in the context of those buildings to be retained. Any new development should show greater respect for the height of the existing buildings on this site and in the broader conservation area.

7. LOCAL REPRESENTATION

7.1 A total of 100 neighbouring properties within the area shown on the map appended to this report were notified about the application and invited to comment. 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: 8 Objecting: 8 Supporting: 0

7.2 The following local groups/societies made representations:

- The Spitafields Trust

7.3 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:

- Opposed to the demolition and redevelopment of 13 – 19 Norton Folgate.
- The additional entry doors to the pub's new Folgate Street frontage will result in an increase in noise and rubbish, having a negative impact upon the residential amenity along Folgate Street;
- An appropriate condition should be imposed requiring secondary glazing throughout to meet current noise standards;
- An opportunity to improve standards of privacy also arises in that the part decorative opaque glass in one of the existing windows of the pub should be extended to the others so that patrons can no longer look directly at the dwelling windows opposite;
- The inevitable increase in vehicular traffic down Folgate Street arising from the redevelopment calls for a road closure to traffic in Blossom Street at the corner of Folgate Street;
- Conditions be imposed ensuring the pub's hours of use are not extended beyond those existing. By the same token appropriate conditions should be imposed limiting hours of construction to those appropriate to adjoining residential uses;
- The extension of the existing gastro pub is entirely unacceptable and represents a serious deterioration of the environment and the amenity not only for the residents immediately opposite in Folgate Street but for the residents in the whole of the immediate vicinity;
- The elevation of the new development proposed for the corner of Folgate Street onto Bishopsgate/Norton Folgate pays no respect to the existing building line, materials, window elevation to what is around it;
- A condition should be imposed where 'any air conditioning, heating or other equipment placed on any roof of the new development should operate in total silence at all times';
- A condition should be imposed where no lighting should be permitted to emanate from any office building after 10pm at night and before 7am in the morning at any time;
- The development will result in the loss of an existing dental practice, which services the local area;
- The lights in the development should be dimmed at night to protect nearby residents from ambient light;
- The 10 storey building will overshadow the Elder Street Conservation Area;
- The 10 storey building will have a negative impact upon the character and skyline of the Conservation Area;
- The height and presence of the building on Folgate Street will impact the character of this street;
- The development will have an impact on views from higher level windows in Elder Street;
- The scheme provides no parking;
- Increased traffic will have a negative impact upon the conservation area;
- There is no consideration for the greening of pedestrian areas; and
- The development will have an unacceptable impact upon access to daylight and sunlight at 17 Elder Street.

7.4 The following issues were raised in representations, but they are not material to the determination of the application:

- The Blossom Street warehouse should be converted to residential units

- The proposed development will result in the loss of existing commercial development. As a result, what compensation is available from the disruption to business?

8. MATERIAL PLANNING CONSIDERATIONS

8.1 The main planning issues raised by the application that the Committee must consider are:

1. Land Use
2. Housing
3. Building Design and Height
4. Amenity
5. Access and Transport
6. Open Space
7. Sustainability
8. Conservation Area Consent
9. Schedules Ancient Monument

Land Use

8.2 The site is currently occupied by a mix of mainly commercial uses including shops, offices and some warehousing. The site is inside the “Central Area Zone” designation of the UDP. The site is also within the Bishopsgate/Shoreditch Opportunity Area, which is intended to accommodate some 16,000 new jobs between 2001 and 2016. Clearly, there is a strategic need for the quantity and type of B1 office employment floorspace which the proposals will provide.

8.3 The Draft City Fringe AAP (CFAAP) identifies the site within a strategic preferred office location. It designates the site as “CF4” which allocates the preferred use of the site for Employment (B1), Residential (C3) and Class A1, A2, A3 and A4 uses.

Office and Retail

8.4 The current total floor space is 11,520 sq.m. The total proposed floor space is 25,615 sq.m and therefore the total uplift in floor space is 14,095 sq.m.

8.5 The London Plan seeks to accommodate a significant proportion of office based employment growth in the East Sub-region, particularly in Opportunity Areas.

8.6 The London Plan identifies that there is continuing “*substantial pressure for further (office floorspace) growth in the Central Activities Zone (CAZ)*” with demand for a further 3.4 million sq.m within the central activities zone up to 2016. The proposed development is expected to generate about 900 jobs (gross) and will make a significant contribution to meeting the planned increase in jobs provision within the Opportunity Area. The office uses will provide the majority of these jobs, although the proposals will give also rise to the provision of a variety of employment opportunities, including A1, A3 and A4 jobs.

8.7 The submitted scheme accords with the objectives of Policy 3B.2 of the London Plan by improving the quality of existing office floorspace and of increasing the amount of floorspace to meet some of the high levels of demand. The scheme is also strongly supported by policy 3B.3, which seeks rejuvenation of office-based activities in the Central Activities Zone.

8.8 The office component complies with the employment policies EMP1 and in particular policy EMP2 (1) of the UDP. The existing employment site is underdeveloped considering its location. Policy EMP9 states that the Central Area Zones are designated as areas of business growth and favourable consideration should be given to development for

business uses (use class B1).

- 8.9 The proposal also satisfies Policy EMP8 of the UDP and CFR9 (4) of the Central Fringe Area Action Plan, which encourages the growth and development of new small businesses within B1 schemes.
- 8.10 The proposal also satisfies Policy EE2 of the Draft LDF Core Strategy document with respect to maximising employment on individual sites and increasing employment opportunities. A Section 106 agreement will be secured to ensure local people gain access to employment during construction. In addition, £262,467 has been secured towards employment initiatives such as Skillsmatch.
- 8.11 According to the City Fringe Area Action Plan, the subject site is identified as a preferred office location. According to paragraph 4.5, commercial development should preserve or enhance the historic urban fabric to create a vibrant mix of new and old buildings, which the proposal is considered to achieve, also in line with CAZ4 of the UDP.
- 8.12 According to paragraph 4.16 of the CFAAP, the Aldgate and Spitalfields Market sub-area, which the site is included in, does not contain any town centres. Due to its location, the sub-area is characterised by retail uses supporting the commercial office functions. The proposed A1 and A3 uses are considered to support the commercial office function, and is inline with the existing character along Norton Folgate and Shoreditch High Street.

Public House

- 8.13 In considering the pub (Class A4) use, the proposal seeks to enlarge the floor area of the existing pub. The additional space is directed towards the rear of the newly formed Blossom Place, as well as west along Folgate Street. According to RT4 of the emerging LDF, consideration must be given to the impacts that will arise from uses that contribute to evening and night-time economy.
- 8.14 The proximity of the pub to adjacent residents is a consideration; however, the existing pub is located adjacent to the majority of the residential units on Folgate Street. The scheme has been amended to remove a number of the proposed entrance doors to minimise disturbance to residents. The entrance locations will now be located to the rear on Blossom Place, the existing access on the corner of Folgate and Blossom Street and to the western extremity of Folgate Street, which is adjacent to commercial premises. The scheme should be conditioned to ensure potential impacts upon the amenity of the residents, such as noise and privacy, are mitigated.

Mixed Use/ Residential Development

- 8.15 The London Plan seeks to establish a mix of land uses that will best meet London's competing demand for land and premises. Policy 3B.4 of the London Plan states "*within the Central Activities Zone and Opportunity Areas, wherever increases in office space are proposed they should provide for a mix of uses including housing, unless such a mix would demonstrably conflict with other policies in the Plan*". The East London Sub-Regional development framework (May 2006) states (as identified in the GLA stage 1 report) that in paragraph 316, that "*The Mayor's Housing SPG sets out the general principle, now operated by Westminster and Camden and proposed by Lambeth, that 50% of the increment to develop capacity associated with office development in the Central Activities Zone and associated Opportunity Areas should be for housing*".
- 8.16 Paragraph 3.125 of the London Plan states "*Exceptions to the mixed-use policy will only be permitted where the requirements for such a mix would demonstrably undermine strategic policy for other developments, including parts of the City and the Isle of Dogs. In such areas, off-site provision of housing elsewhere on suitable land will be required as part of a*

planning agreement”.

- 8.17 According to policy CAZ3 of the UDP, mixed use developments will be sought with particular consideration to the character and function of the surrounding area. The purpose of a mixed use development is to provide vitality and diversity in the CAZ, to avoid areas becoming unused or underused in the evenings and weekends.
- 8.18 The proposed mix of uses is considered appropriate in meeting the mixed use policy whilst respecting the character of the Elder Street Conservation Area and the strategic direction for office-led development. The site is considered to be an exception when considering policy 3B.4.
- 8.19 In considering the planning obligation tests under the ODPM Circular 05/2005, it is not considered that an adequate case has been made to justify the reasonableness of the request for an off-site affordable housing contribution when considering the following:
- The development complies with Policy 3B.1 in developing London’s Economy and policies 3B.2 and 3B.3 which encourage developments that meet office demand and rejuvenate office-based activities in the CAZ;
 - The site is identified as a preferred office location within the emerging LDF City Fringe Area Action Plan;
 - The Elder Street Conservation Area appraisal states that an essential element of the character of the area is that it retains its quiet character. Although, during the working week, there is a measure of commercial bustle, at weekends the area is mostly quiet. Strategically, the site has been identified for commercial use. The introduction of a higher proportion of residential dwellings would have a dramatic impact on the character of this area and is therefore considered inappropriate;
 - The Council is currently meeting its housing targets; and
 - According to the definition for CAZ within the London Plan, these areas are to promote finance, specialist retail, tourist and cultural uses and activities. This report identifies that the site is appropriate for commercial development.

Housing

Affordable Housing

- 8.20 Policy HSG3 of the adopted UDP 1998 states that affordable housing will be required on large housing developments with a capacity for 15 dwellings or more.
- 8.21 Policy CP22 and HSG3 of the emerging LDF document states that the Council will seek a minimum of 35% affordable housing provision on developments proposing 10 new dwellings or more.
- 8.22 The planning application includes reinstating the existing locally listed Arts & Crafts building on Folgate Street back to residential use, including 8 dwellings on the upper floors. As such, the proposal falls just outside the threshold of ten dwellings, the scheme is therefore not required to provide an affordable housing element.

Housing Mix

- 8.23 Pursuant to policy 3A.4 of the London Plan the development should *“offer a range of housing choices, in terms of housing sizes and types, taking account of the housing requirements of different groups, such as students, older people, families with children and people willing to share accommodation”.*
- 8.24 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.

- 8.25 Policy CP21 of the emerging LDF states that the Council will require all new housing developments to contribute to the creation of mixed communities, including family housing. Only on sites providing 10 or more new dwellings, both market and affordable housing, should be provided.
- 8.26 According to Policy HSG2 of the LDF, market housing is required to provide an even mix of dwelling sizes, including a minimum provision of 25% family housing.
- 8.27 The applicant originally submitted a scheme containing 9 residential units, of which there were no family dwellings proposed. The scheme has since been amended to address the Council’s planning policy for mixed communities, providing a total of 8 residential units. The table below summarises the overall mix of units by type:

Units	Total	Habitable Rooms	% of Total
Studio	1	1	75% Non-family units
1 Bed	1	2	
2 Bed	4	12	
3 Bed	2	8	25% Family units
TOTAL	8	23	100

- 8.28 The proposed dwellings comply with the minimum floor space requirement as outlined in the Council’s Supplementary Planning Guidance Note – Residential Space.
- 8.29 The dwelling mix and sizes are considered to comply with the relevant regional and local planning policies.

Amenity Space

- 8.30 Policy HSG16 of the UDP requires that new developments should include adequate provision of amenity space. Policy HSG7 of the emerging LDF states that communal amenity space (including child play space) should only be provided on sites proposing 10 or more residential units. Following is an assessment against the residential amenity space requirements under policy HSG7:

Units	Total	Minimum Standard (sq.m)	Required Provision (sq.m)
Studio	1	6	6
1 Bed	1	6	6
2 Bed	4	10	40
3 Bed	2	10	20
TOTAL	8		72

- 8.31 The applicant originally submitted a scheme that did not include any housing amenity space. However, the scheme has since been amended in response to Council’s concerns and proposes a total of 52sqm of private amenity space.
- 8.32 The proposal is for the conversion of a locally listed building in a conservation area, and as such, it is not possible to provide balconies on the front elevations along Folgate and Blossom Streets. Policy CP25 of the emerging LDF states that in the case of conversions of an existing building, the level of amenity space will need to reflect the constraints of the site.
- 8.33 The GLA stage 1 report states that *“since all proposed dwellings are within a refurbished building the...potential would have to be met within the practicalities of the existing building structure and this limits the opportunities for this particular part of the site”*
- 8.34 The applicant has sought to maximise the provision of private amenity space through the

use of balconies and external entrances to the rear of the dwelling units. The applicant is also providing public amenity space within the site through the enlargement and reconfiguration Blossom Place, which the residents could utilise.

- 8.35 On balance, the areas of non-compliance are not considered to be of sufficient weight to sustain a reason for refusal given the good access to public open space on site. Also, the applicants attempt to maximise all opportunities to provide amenity space within the constraints of the site, being a locally listed building, is considered to be consistent with Policy CP25 of the LDF and other conservation policies within the regional and local planning policy framework. As such, the amenity space provision is considered acceptable.

Building Design and Height

Design and Conservation

- 8.36 Policy 4B.2 of the London Plan states that the Mayor seeks to promote world class design. All development, including intensive or tall buildings, should reflect local character, meet general principles of good design and improve the character of the built environment.
- 8.37 Policy DEV1 of the LBTH UDP sets out the general design principles that the Council will promote, stating that all development proposals should:
- Take into account and be sensitive to the character of the surrounding area in terms of design, bulk, scale and the use of materials;
 - Be sensitive to the development capabilities of the site,
 - Maintain the continuity of street frontages, and take account of existing building lines, roof lines and street patterns;
 - Provide adequate access for disabled people;
 - Maximise the feeling of safety and security; and
- 8.38 Policy CP4 and DEV2 of the emerging LDF states that development must create buildings and spaces of high quality design.
- 8.39 The design of the scheme has been considered in response to the character of the Elder Street Conservation Area. As such, the following policies and guidance notes will also need addressing.
- 8.40 Paragraph 4.14 of PPG15 states that *“special attention shall be paid in the exercise of planning functions to the desirability of preserving or enhancing the character or appearance of a conservation area”*.
- 8.41 Paragraph 4.20 states that, *“as to the precise interpretation of 'preserve or enhance', the Courts have held that there is no requirement in the legislation that conservation areas should be protected from all development which does not enhance or positively preserve. Whilst the character and appearance of conservation areas should always be given full weight in planning decisions, the objective of preservation can be achieved either by development which makes a positive contribution to an area's character or appearance, or by development which leaves character and appearance unharmed”*.
- 8.42 The intent of PPG15 is established within the relevant policies of the adopted UDP 1998. Policy DEV 25, states that *“in considering applications for development in conservation areas the council will pay special attention to the desirability of preserving or enhancing the character or appearance of those areas”*. Policy DEV 26 goes on to say that *“permission will normally be granted for new uses in conservation areas, except where they would be detrimental to the character, fabric or appearance of the area, or its setting”*. Policy CON2(1) of the emerging LDF states that development proposals will be approved in Conservation Areas only where they will preserve or enhance the distinctive character and

appearance of the Conservation Area, in terms of scale, form, height, materials, architectural detail and design.

- 8.43 According to paragraph 5.45 of policy DEV25, *“the character of conservation areas varies considerably and the type of development which may be permitted will consequently be varied. In areas which are uniform in character, proposals will normally be expected to closely reflect the character and design components of existing buildings. However, in areas which include a wide variety of building types, innovative design, which nevertheless reflects the character of the area, may be more appropriate”*. Paragraph 5.46 goes on to say that *“because the architectural and visual unity are important features of Conservation Areas, applications for development must normally to be placed in the context of their setting so that the impact of proposals can be fully assessed”*.
- 8.44 In considering the above mentioned policies and guidance, the character and appearance of the Elder Street conservation area must be identified. According to the Elder Street Conservation Area Appraisal, adopted 7 March 2007, the special character of the area can be identified by looking at the individual views along the historic streets of Elder Street, Folgate Street, Blossom Street, Fleur-de-Lis street, and towards the surviving historic buildings on Spital Square. The potential impact of the development upon the relevant street characters has been addressed below.

Elder Street and Folgate Street

- 8.45 According to the appraisal, *“Elder Street and Folgate Street, at the centre of the Conservation Area, include most of the surviving 18th century developments and contain many original 3 storey brick houses. Their value comes from the consistent proportions of the street, the richness of the brick textures, the refinement of the architectural details, the harmonious relationship of the buildings and the prevailing domestic residential character”*.
- 8.46 The applicants supporting information identifies that the development will have no impact upon Elder Street as viewed from street level. Whilst the 10 storey element may be observed from higher window levels, the immediate background is dominated by the 35 Storey building which also terminates the existing view along Folgate Street (looking east).
- 8.47 The southern end of the proposed building is seen in oblique view at the end of Folgate Street, while the vista is dominated by 201 Bishopsgate. The ‘Arts and Crafts’ buildings will be retained and refurbished, with the proposed new frontage just visible beyond. The height of the new building can only be seen slightly above the existing, due to the stepped design of the building along Norton Folgate.
- 8.48 Once completed, 201 Bishopsgate will close the view out of the conservation area with a building of dramatically larger scale. The substitution of the new corner building of similar height to the existing when seen in this view is considered to have little effect.
- 8.49 Accordingly, the proposed development is considered to preserve and enhance the character and appearance of the Conservation Area, in terms of scale, form, height, architectural detail and design. The reuse of the Arts and Craft building will provide a positive contribution to the Conservation Area.

Norton Folgate

- 8.50 Paragraph 4.16 of PPG15 states that *“while conservation (whether by preservation or enhancement) of their character or appearance must be a major consideration, this cannot realistically take the form of preventing all new development: the emphasis will generally need to be on controlled and positive management of change. Policies will need to be designed to allow the area to remain alive and prosperous”*.

- 8.51 Paragraph 4.16 also states that the development must be in harmony with the area's special architectural and historic interest.
- 8.52 The Conservation Area appraisal states that *“there is a mixed frontage to Norton Folgate which includes modern office blocks, the remains of Georgian residential development, later 19th century mixed-use commercial buildings and a 1930s showroom frontage at the north-west corner of the Conservation Area. Although many of these buildings do not have exceptional intrinsic value, together they illustrate the area’s residential and commercial history. They front on to an ancient road where evidence of the area’s past is increasingly rare.*
- 8.53 The impact of the development upon the character of Norton Folgate and Shoreditch High Street is considered to be unacceptable by the Council’s conservation officer and the external conservation bodies. Notwithstanding, the Conservation Area Advisory Group has advised that they accept that buildings 2, 3 – 9 Norton Folgate and 20 Shoreditch High Street are suitable for demolition and redevelopment. 13 Norton Folgate is also considered to be a possible demolition and rebuild site.
- 8.54 There are no listed buildings along Norton Folgate/Shoreditch High Street. The GLA and English Heritage do not consider 14 – 19 Norton Folgate to have any historic preservation value that would benefit the character of the conservation area over the benefit of the proposed development.
- 8.55 Policy 4B.1 of the London Plan states that ‘The Mayor will seek to ensure that developments ...respect London’s built heritage.’ The GLA stage 1 report notes that *“the urban design concept responds positively to the character of the conservation area and the busy road to the west of the site”* (Norton Folgate/Shoreditch High Street). The scheme is also considered to adopt an *“excellent massing concept...that preserves the scale of the conservation area along Blossom Street and Folgate Street while creating a suitably larger scaled presence on Norton Folgate/Shoreditch High Street”*. Further, CABE was supportive of the development.
- 8.56 Accordingly, the proposed development is considered to enhance the character and appearance of the Conservation Area, in terms of scale, form, height, architectural detail and design.

Blossom Street/ Fleur-de-Lis Street

- 8.57 *Blossom Street is an important surviving piece of 19th century townscape. On the western edge of this street are a series of high quality 4 storey brick warehouses built from 1886 onwards. This industrial character continues along parts of Fleur-de-Lis Street. Stone setts make a positive contribution to the character of these streets. There are many vacant or underdeveloped sites, particularly in the north of this Conservation Area, which detract from the coherent building lines along most of the streets.*
- 8.58 According to paragraph 4.17 of PPG15, *“many conservation areas include gap sites, or buildings that make no positive contribution to, or indeed detract from, the character or appearance of the area; their replacement should be a stimulus to imaginative, high quality design, and seen as an opportunity to enhance the area”*.
- 8.59 In considering the impact of the development upon the character of Blossom Street/ Fleur-de-Lis Street, the following needs to be considered:
- 8.60
- Depot site;
 - 16/17 Blossom Street Infill;
 - Refurbishment of the warehouses; and

- Impact of the 10 storey building.
- 8.61 The Depot building makes no positive contribution to the conservation area. The GLA Stage 1 noted that the design of the smaller development on the south corner of Fleur de Lis Street and Blossom Street was considered to be *“calm with high quality materials and would therefore preserve the character of the conservation area”*. Similarly, number 16/17 Blossom Street is a nondescript 1950s building. Council’s conservation officer has confirmed that both proposals on these sites are successful in scale and height, preserving the roof and building lines of the street. These infill developments are considered to enhance the character of Blossom Street.
- 8.62 Regarding the warehouses, a number of the conservation bodies, support the restoration of the warehouses, including the roof extensions. English Heritage raised concerns regarding the visual impact of the extra storey above the existing roof on Blossom Street. The applicant has since amended the scheme to ensure that the roof extensions will in general, not be seen from Blossom Street, which English Heritage has considered and raised no objection to.
- 8.63 The proposed buildings along Norton Folgate/Shoreditch High Street are suitably setback from Blossom Street that they will not be seen from the street. Whilst there may be a degree of overshadow in the afternoon, the close proximity of the existing buildings already casts Blossom Street into shadow. There are also no residential windows in this street.
- 8.64 The 10 storey element will be clearly visible from Fleur-de-Lis Street when looking west. However, views west will be dominated by 201 Bishopsgate on the western side of Norton Folgate. The Shoreditch High Street frontage will effect a transition between the historic scale to the east and City scale to the west, providing an effective middle ground focus of the view.
- 8.65 To conclude, the following list provides a concise summary of the principle ways in which this scheme supports the planning policies and also achieves preservation and enhancement of the Conservation Area:
- Preservation, repair and refurbishment of 19th century warehouse in Blossom Street;
 - Preservation, repair and refurbishment of Arts and Crafts building, Folgate Street;
 - Substantial increase and diversification of employment uses on site;
 - Bespoke, high quality architectural design replacing poor existing buildings;
 - Enlargement and enhancement of Blossom Place;
 - Enhancement of site permeability and linkage to the Conservation Area;
 - Provision of additional amenity space along the northern section of the site interior;
 - Increased public realm on western site perimeter adjacent Shoreditch High Street/Norton Folgate;
 - Reinstatement of residential use in former residential (Arts and Crafts) block;
 - Removal of depot building and 16/17 Blossom Street which provide a negative to neutral contribution to the Conservation Area;
 - Establishment of new high quality urban block and re-formation of street corner of Conservation Area;
 - Regeneration of retail activity
 - Restoration of active street frontages
- 8.66 Supporting paragraph 4.17 of the City Fringe AAP states that new buildings should complement the important historic environment in their scale and nature, whilst paragraph 4.19 goes on to say that development should complement the historic nature of the Conservation Area with modern structures in appropriate locations. The scheme is considered to achieve an appropriate balance between conservation and redevelopment, providing a positive contribution to character and appearance of the Conservation Area.

Tall Building

- 8.67 The London Plan encourages the development of tall buildings in appropriate locations. Policy 4B.8 states that tall buildings will be particularly appropriate where they create attractive landmarks enhancing London's character, help to provide a coherent location for economic clusters of related activity or act as a catalyst for regeneration and where they are also acceptable in terms of design and impact on their surroundings. Policy 4B.9 of the London Plan requires all large-scale buildings, including tall buildings, to be of the highest quality of design.
- 8.68 Policy DEV5 of the LBTH UDP states that tall buildings may be acceptable within the Central Area Zones subject to policies DEV1 and DEV2. The development will also:
- 8.69
- not adverse impact on the micro climate, wind turbulence, overshadowing and telecommunication interference,
 - have access to appropriate transport and infrastructure,
 - not adversely harm the essential character of the area or important views; and
 - identify and emphasise a point of civic and visual significance.
- 8.70 Policy DEV27 of the emerging LDF provides a suite of criteria that applications for tall buildings must satisfy. The proposal satisfies the relevant criteria of Policy DEV27 as follows:
- The design is sensitive to the context of the site, responding both to the Bishopsgate/ Shoreditch High Street corridor and to the Elder Street Conservation Area;
 - The architectural quality of the building is considered to be of a high design quality, demonstrated in its scale, form, massing, footprint, materials, relationship to other buildings and open space provision;
 - The site falls within the strategic linear view corridor of St. Paul's as view from Richmond Park that was introduced in the Draft SPG London View Management Framework (GLA, April 2005). However, the height of the development to the west (201 Bishopsgate) is above the proposed development and shields the proposal when viewed from Richmond Park;
 - Visually integrated into the streetscape and the surrounding area;
 - Present a human scaled development at the street level;
 - Respects the character of the Elder Street Conservation Area and seeks to incorporate and reflect elements of local distinctiveness;
 - There will be no adverse impact on the privacy, amenity and access to sunlight and daylight for surrounding residents;
 - Demonstrates consideration of sustainability throughout the lifetime of the development, including the achievement of high standards of energy efficiency, sustainable design and construction;
 - The scheme will contribute positively to the social and economic vitality of Shoreditch High Street/Norton Folgate through its proposed mix of uses;
 - Incorporates the principles of inclusive design;
 - The site is located in an area with excellent public transport access;
 - Take into account the transport capacity of the area, and ensures the proposal will not have an adverse impact on transport infrastructure and transport services;
 - Improves permeability with the surrounding street network, including increased public realm and public open space;
 - The scheme provides publicly accessible areas within the building, including the ground floor;
 - The scheme would conform with Civil Aviation requirements; and
 - The scheme would not interfere, to an unacceptable degree, with telecommunication and radio transmission networks.

- 8.71 The tall element complies with the requirements of London Plan policy 4B.9 and LBTH Core Strategy policy DEV27.

Accessibility and Inclusive Design

- 8.72 HSG8 of the Unitary Development Plan 1998 states that on suitable sites, the council will seek to negotiate some provision of dwellings to wheelchair standards, and a substantial provision of dwellings to mobility standards. Policy HSG9 of the emerging LDF states that the Council will seek that all new housing is designed to Lifetime Homes standards, including at least 10% of all housing being wheelchair accessible or easily adaptable for residents who are wheelchair users.
- 8.73 The proposed development has been designed on the principles of inclusive design. The development will provide step free access routes across the site and maximise circulation space at ground floor. An accessible high quality public realm for building users and visitors will be created.
- 8.74 All residential units are designed to meet or exceed current Lifetime Homes standards. One of the 2-bed units has been designed to be fully wheel chair accessible, which exceeds the 10% minimum requirement. Whilst the development is car free, the applicant has amended the scheme to provide a disabled car parking space within the site.

Amenity

Privacy

- 8.75 The residential dwellings are to be accommodated within the locally listed 'Arts and Crafts' building on Folgate Street. The existing separation distance from the buildings south on Folgate Street is approximately 9m. The scheme is not required to comply with the setback distance of 18m identified under DEV2 of the UDP, as this guidance is for new developments only.
- 8.76 The Arts and Crafts building was previously residential above ground level, before it was converted to office use in the 70's. No objections have been received from adjoining neighbours regarding impacts on their privacy from the residential component. However, an objection has been raised regarding the impact of the extended pub upon their privacy of the adjacent residents. It is recommended that a condition is included that prevents impacts upon the privacy of the adjoining residents from the proposed pub.

Assessing daylight and sunlight

- 8.77 DEV 2 of the UDP seeks to ensure that the adjoining buildings are not adversely affected by a material deterioration of their daylighting and sunlighting conditions. Policy DEV1 of the emerging LDF states that development is required to protect, and where possible improve, the amenity of surrounding existing and future residents and building occupants.
- 8.78 The Building Research Establishment (BRE) guideline provides three main methods of calculation for daylight. Where the internal room layouts are known the BRE Guideline indicate that the appropriate methodology is the application of the Average Daylight Factor (ADF). The BRE Guideline suggests minimum criteria being 2% ADF for kitchens, 1.5% for living rooms and 1% for bedrooms.
- 8.79 In relation to sunlight, the BRE criteria given calculates the annual probable sunlight hours (APSH) which considers the total amount of sun available in both the summer and winter for each given window which faces within 90° of due south. *"Windows must receive at least a quarter of annual probable sunlight hours, including at least 5% of annual probable*

sunlight hours during the winter months, between 21 September and 21 March”.

- 8.80 The applicant’s daylight/sunlight analysis considers the potential impact of the proposed development on existing neighbouring dwellings as well as future occupants of the proposed residential dwellings, and compares the results against the current BRE guidance.
- 8.81 The report identified that there are very few sensitive receptors in proximity to the development site. It goes on to state that there are a limited number of residential properties adjacent to the proposed scheme. The analysis identifies the following:
- To the west of the scheme on Norton Folgate and Shoreditch High Street, all properties including consented properties are in commercial usage and therefore not material for consideration;
 - To the north of the scheme on Fleur de Lis Street, all properties are in commercial usage and therefore not material for consideration; and
 - To the east and south of the scheme on Blossom Street and beyond Elder Street there is a combination of commercial and residential properties
- 8.82 The report confirms that there will be no adverse impact on the access to sunlight and daylight for existing properties to the east and south of the site, including Elder Street, apart from 1 window at 16 Folgate Street.
- 8.83 With regards to the proposed development, the analysis considers the daylight and sunlight amenity available to future occupants of the refurbished Arts and Crafts building. The accommodation would be located on the first, second and third floors of the aforementioned building.
- 8.84 In terms of daylight, of the 25 rooms tested, 4 will not strictly comply with the ADF requirement recommended by the BRE report. Of the four rooms, one is a kitchen where the aperture in question has been detailed with an opaque material as an architectural feature rather than with the purpose of being a window, and thus to all intents and purposes should be treated as an internal kitchen with no expectation of natural daylight. Two rooms are bedrooms which will achieve an ADF of 0.87% (R6/652) and 0.59% (R4/653) respectively. Whilst these do not meet the BRE suggested ADF standard, their usage as bedrooms does mean that they would have a lower expectation for daylight. There is 1 kitchen/Living room/Dining Room on the first floor (R5/651) which will not meet the BRE Guideline daylight standard (0.8%).
- 8.85 In relation to sunlight, of the 39 windows analysed for the sunlight incident upon the external face of windows, 77% (30 windows) will achieve or exceed the total annual 25% APSH recommended by the BRE Guidelines. Of the 9 rooms which do not strictly comply in terms of meeting the BRE Guideline target, four (4) achieve between 21% and 24% and so are just a little short of the ideal total, whilst the remaining 5 achieve 0%, 3%, 12%, 16% and 17%. In addition 19 windows will not meet the Winter sunlight target of 5% of the total APSH which the BRE stipulates.
- 8.86 The daylight and sunlight failures are primarily a function of the existing densely developed, historic and urban location. In addition, the retained façade forms part of the locally listed building which fronts on to Folgate and Blossom Streets. The scheme is therefore inheriting the daylight and sunlight situation where there is no opportunity to increase window aperture size. The scheme locates principle rooms on the southern elevation as the BRE recommends, taking advantage of available sunlight.
- 8.87 Due to these limitations the proposed residential accommodation does not entirely comply with a strict interpretation of the BRE Guidelines. Despite these limitations, 84% of the rooms proposed will achieve BRE compliant levels for daylight, of which only 8% (or 2

rooms) fall more than a fraction short of the target ADF daylight values specified by the BRE Guidelines.

- 8.88 The sunlight issues have not changed from that experienced within the existing situation as the façade is retained, and therefore inherited. Notwithstanding this, 77% of the windows will comply with or exceed, and in some cases substantially exceed, the total APSH target values suggested by the BRE Guidelines.
- 8.89 The BRE document states that, *“in special circumstance, the...planning authority may wish to use different target values. For example, in a historic city centre a higher degree of obstruction may be unavoidable if new developments are to match the height and proportions of existing buildings. As such, given the existing site and layout constraints mentioned above, it would seem reasonable that the BRE guideline should be interpreted flexibly in this densely developed, historic and urban location. The areas which do not strictly comply are therefore not considered to amount to a significant breach of the BRE Guidelines*
- 8.90 Overall, the analysis undertaken demonstrates that given the approach recommended by the BRE Report, the impact of the proposed development is acceptable.

Noise

- 8.91 Based on the results of the applicant’s noise report, the residential elements of the site fall into PPG24 Noise Exposure Category C. PPG24 states “Categories B and C deal with situations where noise mitigation may make development acceptable”. The report provides full details of how these noise mitigation measures will be achieved. The report concludes that neither noise nor vibration will result in any adverse impact. The report also confirms that noise treatments to the facades of the office component will mitigate any impacts upon the development from external noise
- 8.92 The comments from the Council’s Environmental Health department suggest that suitable treatment could mitigate any potential impacts and as such the scheme should be conditioned appropriately to ensure any impacts can be mitigated and internal noise criteria for the commercial and residential accommodation is complied with.
- 8.93 The applicant’s noise report predicts that any resultant increase in noise from the development will have a low adverse impact.
- 8.94 The report does not appear to address any potential impacts that could arise from the proposed public house, and as such, should be conditioned appropriately, including hours of operation and noise mitigation.

Vehicular Access and Transport

Access

- 8.95 Vehicular access to the site is provided from Blossom Street, for service and refuse vehicles and disabled parking users.
- 8.96 TfL have assessed the transport assessment and considered the cumulative traffic related impacts and have raised a requirement for a Travel Plan. This has been provided, the implementation of which should be secured through s106 agreement.

Parking

- 8.97 The scheme would be car free, apart from one disabled space to be provided in response to comments from TfL. Overall, TfL and the Council’s Highways department support car

free development.

- 8.98 The scheme previously provided 100 cycle spaces. The scheme has been amended to provide 131 cycle spaces in total and associated cycle facilities. TfL has advised that 90 spaces are to be provided for the office development, 9 spaces for the residential, 7 spaces for the A1 use and 25 spaces for the A3 use. Transport for London supports the number cycle spaces proposed.

Public Transport

- 8.99 The site is well served by public transport and has a public transport accessibility level (PTAL) of 6. The site is in close proximity to Liverpool Street underground station and a number of bus services which run along Norton Folgate/ Shoreditch high Street.

Servicing and Refuse Provisions

- 8.100 Two service/loading bays, accessed via Blossom Street, for the office and retail components of the development are proposed on Blossom Place. TfL welcomes the proposal of including a size restriction (i.e. up to 5.9m) on vehicles given access to the loading bays as part of the leasing agreements associated with the proposed office/retail development.
- 8.101 In order to reduce the total number of service trips generated which may have an adverse impact on the surrounding road network, the applicant submitted a servicing management strategy which is considered appropriate. The Highways department has advised that separate off-street servicing for the depot site is not required.
- 8.102 The service statement restricts the commercial refuse collection vehicle to a swept path of 7.75m which was considered acceptable by the Highways department and TfL. Domestic waste will be collected by a 10m refuse vehicle that currently collects waste along Folgate Street.

Open Space

- 8.103 According to CRF5(6) of the City Fringe LDF, new publicly accessible open space should be provided as part of other new developments, including office and residential schemes through:
- small 'pocket parks' within development proposals, particularly higher density office and residential schemes in the west of the area;
 - improvements to the quality of streets and road corridors, through planting, surfacing and street furniture, where they could contribute significantly to the overall open space network within the area.
- 8.104 The existing public realm consists solely of the surrounding pavement area, and the small courtyard accessed from Blossom Street associated with the pub/restaurant in the Arts & Crafts corner block. The public realm is to be improved as follows:
- The proposed design substantially increases the area of public realm behind the existing back edge of pavement on Norton Folgate, and extends this into a new link through to Blossom Street, via the reconfigured and enlarged Blossom Place;
 - The historical open space on the site which is known as 'Blossom Place' is to be retained, enlarged and upgraded to provide a managed public open space. It is envisaged that this space and its access links to Norton Folgate and Blossom Street would be fully accessible to public use during the daytime while being managed and maintained as part of the development, with gated security at agreed night time hours. Working in conjunction with the adjacent retail/ pub uses and the office

- development, this regenerated Blossom Place would provide a high quality public amenity at the heart of the scheme, as well as reinforcing an element of the site's historical identity.
- In addition to the reformed Blossom Place, the site will benefit from the extension of the area of open space northwards between the east and west sections of the development. This takes the form of an amenity space for the benefit of office users within the restored warehouse complex, accessed from the central core via the existing historic archway or from Blossom Place.

8.105 The overall enhancement of the public realm may be quantified as follows:

Existing	Area (m ²)	Proposed	Area (m ²)
Blossom Place	120	Blossom Place	420
Passage entrance	62	Passage entrances	149
		Northern courtyard	198
		New street foreground	253
<i>Total</i>	<i>182</i>	<i>Total</i>	<i>1020</i>
Increase			560 %

8.106 The proposal provides significant benefits in respect of the provision of public realm and is considered to address the relevant policy. However, whilst there is a significant increase to the public realm, the large number of workers that the development would create may have a negative impact upon the existing public realm, particularly given the sensitivity of the Conservation Area. Accordingly, a contribution towards improving the public realm within the Elder Street Conservation Area is considered appropriate. A section 106 agreement will also be required to address the 'public right of way' through the site.

Sustainability

8.107 The London Plan energy policies 4A.7-4A.9 aim to reduce carbon emissions by requiring the incorporation of energy efficient design and technologies, and renewable energy technologies where feasible. Energy Efficiency is addressed in policy DEV6 which reiterates the Mayor's target of 10% of new development's energy to come from renewable energy generated on site and a reduction of 20% of emissions. Policies DEV7, DEV8, DEV9 and DEV11 seek sustainable developments through water quality and conservation, sustainable drainage, sustainable construction materials, air pollution and air quality.

8.108 The Energy Strategy Proposal Report makes proposals for the use of renewable and low carbon energy sources for the development. A review of the performance of the various systems together with assessment of design integration implications has led to the proposal of a closed loop ground coupling system that is incorporated within the development sub-structure or "Energy Piles". It is proposed that this system will deliver 10% of total annual site energy use when serving the office area heating/cooling installations. The residential areas of the development shall comply with Part L of the Building Regulations (conservation of fuel and power).

8.109 To reduce the necessary energy the development will also include high performance facades and a number of other passive design measures.

8.110 The GLA stage 1 report states that:

"The energy statement lacks sufficient justification for the rejection of heating and cooling measures in relation to policy 4A.8 of the London Plan. In particular, the applicant needs to provide detailed consideration of a combined heat and power system (CHP) and combined cooling heat and power system (CCHP). The scheme does not take a site-wide

approach to infrastructure and does not provide any justification as to why not. Whilst the inclusion of energy efficiency and renewable energy measures are positive, the scheme is not yet consistent with the current London Plan and is inconsistent with the draft Further Alterations to the London Plan. Unless this issue is resolved, the scheme cannot be recommended for support should it be referred back to the Mayor for decision”.

- 8.111 Whilst agreed measures should be secured by the Council as part of any planning permission, the GLA have agreed that it is acceptable to present the application before the Strategic Planning Committee as long as the energy strategy is agreed before the Stage II referral expires. As such, the scheme should be conditioned appropriately.

Conservation Area Consent

- 8.112 The scheme is proposing to demolish 13-20 Norton Folgate, 2-9 Shoreditch High Street and 10, 16 and 17 Blossom Street.

- 8.113 Paragraph 4.26 of PPG15 states that *“account should be taken of the part played in the architectural or historic interest of the area by the building for which demolition is proposed, and in particular of the wider effects of demolition on the building’s surroundings and on the conservation area as a whole”.*

- 8.114 Paragraph 4.27 goes on to state that, *the general presumption should be in favour of retaining buildings which make a positive contribution to the character or appearance of a conservation area...in less clear-cut cases - for instance, where a building makes little or no such contribution - the local planning authority will need to have full information about what is proposed for the site after demolition. Consent for demolition should not be given unless there are acceptable and detailed plans for any redevelopment. It has been held that the decision-maker is entitled to consider the merits of any proposed development in determining whether consent should be given for the demolition of an unlisted building in a conservation area.*

- 8.115 Policy DEV28 of the UDP states that *proposals for the demolition of buildings in conservation areas will be considered against the following criteria:*

- *the desirability of preserving or enhancing the character or appearance of the area;*
- *the condition of the building ;*
- *the likely costs of the repair or maintenance of the building;*
- *the adequacy of efforts to maintain the building in use; and*
- *the suitability of any proposed replacement building.*

- 8.116 Policy CON2 (3) of the emerging LDF states that applications for the demolition of buildings that make a positive contribution to the character and appearance of a Conservation Area will be resisted. Where exceptional circumstances require demolition to be considered, applications will be assessed on:

- the importance of the building, architecturally, historically and contextually;
- the condition of the building and estimated costs of its repair and maintenance in relation to its importance, and to the value derived from its continued use;
- the adequacy of efforts made to retain the building in use; and
- the merits of any alternative proposal for the site.

- 8.117 Following is an assessment of the proposed buildings to be demolished against the abovementioned policy and guidance notes.

2-9 Shoreditch High Street and 20 Norton Folgate

- 8.118 The conservation report prepared by the applicant considers the Shoreditch High Street

frontage buildings to be of neutral value or that which detract from the character and appearance of the conservation area.

- 8.119 As mentioned above, CAAG has advised that they accept that buildings 2 and 3 – 9 Shoreditch High Street and 20 Norton Folgate are suitable for demolition and redevelopment. English Heritage has also not objected to the demolition of the building. These buildings are not listed.
- 8.120 The preceding sections of this report confirm the suitability of the proposed replacement building. The proposed demolition of these buildings is considered to be acceptable in accordance with the UDP, emerging LDF and PPG15.

10 Blossom Street

- 8.121 This site contains a motor transport depot, consisting largely of a non-descript 1950s and 60s flat roofed single storey building. The conservation assessment states that the building makes a negative contribution to the Conservation Area. Comments from the Council's conservation officer support this opinion.
- 8.122 The preceding sections of this report confirm the suitability of the proposed replacement building. The proposed demolition of this building is considered to be acceptable in accordance with the UDP, emerging LDF and PPG15

16 and 17 Blossom Street

- 8.123 This building is a non-descript 1950's building with recent remodelling. It has been identified as, at best, a neutral building, unrelated to the Georgian core to the south and with only limited affinity to the warehouses to the north. It represents an opportunity for enhancement through replacement, which Council's conservation officer has accepted.
- 8.124 The preceding sections of this report confirm the suitability of the proposed replacement building which was considered to enhance the character and appearance of the Conservation Area.

13 – 19 Norton Folgate

- 8.125 The applicants conservation assessment has appraised the value of these buildings as follows:
- No 13 is a brick 1930's office building. Whilst it is considered to provide an acceptable entrance to the Conservation Area, it is intrinsically undistinguishable. It is at best neutral in its contribution;
 - No 15 is individually of some interest, retaining something of the character of the early 18th century redevelopment of this frontage. However, the front is a mid 19th century rebuild, the rear largely lost or a recent rebuild. The building suffers from structural instability, repair amounting to a further rebuild, producing a modern copy. Its neighbour, No 14, was probably once similar but was wholly rebuilt except for the cellar and part of the front wall in the 1930's. The result is a pastiche with an unconvincing roofline, which makes a neutral contribution to the conservation area; and
 - No's 16-19 are uniform terrace commercial buildings. They can be dated to 1873 – 1894. They are considered to be ordinary buildings of a style common in suburban London. They are unrelated in style to any others in the conservation area as a whole, and their contribution to its character and appearance is neutral.
- 8.126 The external conservation bodies and Council's conservation department advised that buildings 13 – 19 Norton Folgate should not be demolished. The scale, pattern and rhythm

of the existing buildings were considered to be important and a much need counterfoil to the large block developments that have occurred both along Norton Folgate and Bishopsgate. They considered these buildings to be a coherent group that reflects the remaining ancient street of Norton Folgate.

8.127 As mentioned previously, paragraph 4.27 of PPG15 states that the buildings must make a *positive contribution to the character or appearance of a conservation area*. The applicants conservation assessment states that these buildings are peripheral to the remainder of the conservation area in the sense that, apart from at the entrance to Folgate Street (13 Norton Folgate), they are not seen in conjunction within its other character areas, nor do they relate closely to them. As mentioned earlier, CAAG advised that 13 Norton Folgate is considered to be a possible demolition and rebuild site.

8.128 Careful consideration of the criteria for demolition identified above must be given, and is addressed below:

- *The condition of the buildings to be demolished*

8.129 A detailed assessment of the condition of these buildings has been undertaken by the applicant. A report prepared by William Martin and Partners concludes that apart from 13 Norton Folgate, which is in a fair condition with only minor repairs required, the other buildings, which are vacant, are in a poor condition and extensive works would be required to bring them back into use.

- *The cost of repairing and maintaining in relation to their importance and to the value derived from continued use*

8.130 The report prepared by William Martin and Partners provides an outline specification and budget cost for bringing 13 - 19 Norton Folgate into optimum beneficial use.

8.131 The applicant considers that there are two options for the provision of office accommodation at 13 - 19 Norton Folgate. The buildings could either be used as self contained offices capable of single or multi-let (Option A), or self contained retail units at ground and basement (storage) with self contained offices on 1st to 3rd floors capable of single or multiple let (Option B).

8.132 Although considerable works of repair would be required to these buildings, the applicant accepts that in theory the buildings could be brought into use. However, the type of office space that would be provided in these buildings (which would consist of inflexible, small cellular rooms with limited service quality) is not regarded to be suitable to meet the need for this strategic office location.

- *The value derived from retaining the buildings in use juxtaposed to the proposed scheme.*

8.133 The retention of 13-19 Norton Folgate would thwart the coherent development of the site as a whole. A policy, conservation and design led approach has been taken to the formulation of the proposals. The scheme therefore represents a coherent, comprehensive and sustainable approach to the redevelopment of the site which will provide a number of benefits. The retention of 13-19 Norton Folgate would prevent the delivery of these benefits, which include:

8.134 *Land use benefits:* The regeneration of economic activity, diversification of uses, and provision of good quality private residential accommodation for which there is a local need.

8.135 *Conservation benefits:* preservation, repair and refurbishment of the 19th century warehouses on Blossom & Fleur de Lis Streets; restoration of the historic townscape

through reinstating the missing top storey at no. 13 Blossom Street; retention, repair and refurbishment of Arts & Crafts building on Folgate Street, returning the upper floors to their original residential use.

- 8.136 *Design benefits:* high quality new architectural design and construction; restoration / intensification of active street frontages; replacement of poor / derelict existing structures on Norton Folgate, enhancement of Blossom Place; upgrade of circulation in and material fabric of public realm; and increased permeability.
- 8.137 It must be emphasised again that the GLA and English Heritage support the extent of demolition proposed, and have not asked that the applicant retains (or considers retaining) 13 - 19 Norton Folgate. These consultation responses carry significant weight.
- 8.138 Whilst it is acknowledged that the demolition of 13 - 19 Norton Folgate would result in some limited harm to the historic character and appearance of a small part of the Elder Street Conservation Area, when considering the poor condition of the buildings, the limited value derived from bringing the buildings back into use, and the merits of the proposed scheme, the proposed demolition is considered appropriate.

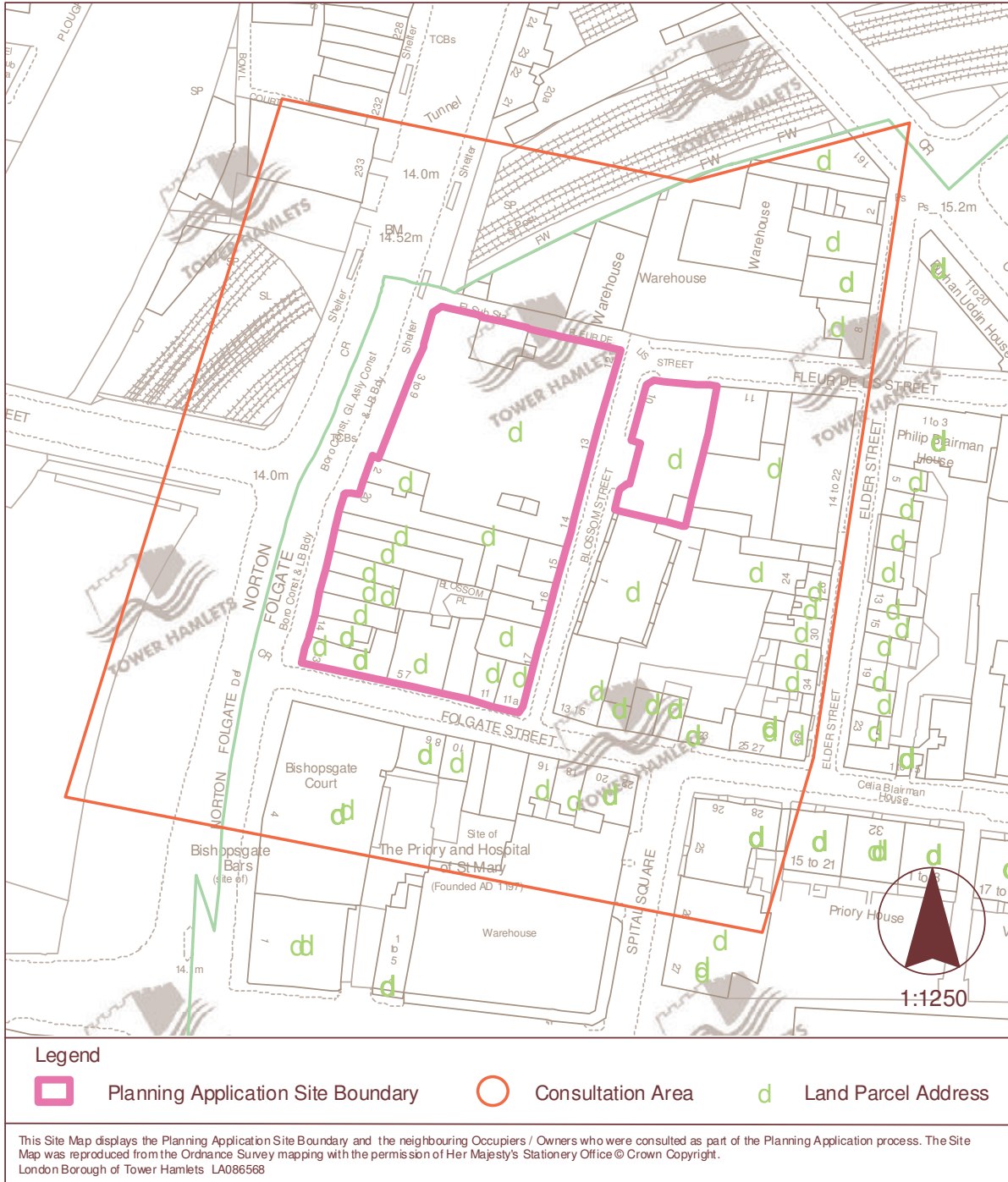
Schedules Ancient Monument

- 8.139 Following the recommendations of English Heritage, eight evaluation trenches were excavated on the site by the Museum of London Archaeological Services. Their report confirms that no activity relating to the medieval Priory and Hospital of St Mary was found. The report concludes that the development proposals will not be detrimental to the Schedules Ancient Monument.
- 8.140 According to paragraph 4.25 of PPG15, scheduled ancient monuments are exempt from conservation area control; scheduled monument consent for proposed works must be sought from the Secretary of State for National Heritage.

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

Agenda Item 8.2

Committee: Strategic Development	Date: 21 st June 2007	Classification: Unrestricted	Agenda Item No: 8.2
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	
		Wards: Bow East	

1. APPLICATION DETAILS

- Location:** **1./2. Site Preparation / Olympic, Paralympic and Legacy Transformation Planning Applications**
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.*
- 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.
- 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 A** – Revised Description.
- Drawing Nos:** For a full list of documents submitted with the Regulation 19 and clarification information please refer to **Appendix B**.
- Applicant:** **1./2. Site Preparation / Olympic, Paralympic and Legacy Transformation Planning Applications** - Olympic Delivery Authority C/- EDAW
- Owner:** London Development Agency
Historic Building: N/A
Conservation Area: N/A

2. RECOMMENDATION

- 2.1 The ODA Planning Decisions Team should consider the views and issues of the London Borough of Tower Hamlets as set out in the Observations Letter to the ODA PDT which is to follow the consideration of this report by the Strategic Development Committee.
- 2.2 That the **Corporate Director of Development and Renewal** be given **delegated powers** to make further observations and/or recommendations (as necessary) to the ODA.

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		Eileen McGrath 020 7364 5321

3. SUMMARY

- 3.1 In February 2007 the Olympic, Paralympic and legacy transformation planning applications were submitted. Following the submission of these applications the Olympic Delivery Authority Planning Decisions Team (ODA-PDT) have requested under Regulation 19 of the EIA Regulations 1999, the submission of further information in relation to the facilities and their legacy transformation planning application (Ref 07/90010) and the site preparation planning application (Ref 07/90011).
- 3.2 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.
- 3.3 The following table summarises the Regulation 19 items requested by the ODA PDT:

Regulation 19 Items	Summary of Information Requested
General Environmental Issues	Construction measures to minimise environmental effects, assessment periods, further mitigation measures, cumulative effects.
Mitigation Measures	Details of mitigation measures set out in relation to the Code of Construction Practice, a Biodiversity Action Plan, the OPTEMS arrangements, a Travel Plan Strategy and a Local Employment & Training Framework.
Landscape and Townscape	<p>Details of any significant landscape and/or townscape and/or visual effects which may arise from the wind turbine, CCHP stack and any telecommunication masts and identification of mitigation measures proposed.</p> <p>Details of assessment of open space effects including the methodology used for assessment, quantification of the baseline and explanation of how the proposals at each phase of development address existing and future open space requirements for the user populations as they change over time.</p>
Socio-economic	Details of employment effects including a baseline illustrating present and future challenges in employment on site, a sensitivity analysis including a range of assumptions about indirect and induced multiplier effects, the value of construction employment, the extent to which construction employment will be recruited locally and the economic effects of the displacement of existing jobs. Details also relate to the sensitivity of the likely number and life of operational employment during the Olympic games phase and the long term tourism and visitor expenditure which will continue during legacy.
Transport	Further sensitivity analysis for the transport assessment in relation to the comparative effects, further clarification and or assurance

	of assumptions and approach, further assessment, and articulation on shuttle bus availability, junction capacity, remote public transport and highway impact and accident/safety implications required. Further information is requested in relation to junction and highways analysis and mitigation schemes.
Ecology and Nature Conservation	Provision of ecology plans detailing ecological constraints and areas to be safeguarded, confirmation on the extent of permanent overshadowing of watercourses by bridges and the impact and information on the effects of the wind turbine on bird and bat populations.
Noise and Vibration	Summary of significant environmental effects to include noise and vibration issues. The code of construction practice should detail specific information in relation to construction and operational noise.
Microclimate	Detail of the likely mitigation measures to deal with wind effects in addition to an assessment of the anticipated shadowing of waterways will impact on ecology and public enjoyment.
Archaeology	Provision of method statements, desk based assessments and written schemes of investigation for archaeological investigation.
Water and Waste	Further details to confirm the intended capacity and performance criteria for on site surface water drainage and collection systems, information on the capacity of the existing water supply infrastructure, extent of estimated average peak water usage, how water efficiency techniques will be used, where water efficiency savings are subject to behavioural variation and increases in the seasonality of rainfall due to climate change. A revised flood risk assessment along the key likely cumulative effects.
Soils and Contaminated land	A zone by zone summary is required to identify the extent of existing site investigations, programme, extent and method statement of further site investigations, principle remediation and other mitigation measures planned.
Air Quality	A revised Code of construction practice should set out the measures taken to avoid, minimise and manage unacceptable generation of dust. A cumulative assessment required of the transport emissions, the localised impact of the biomass boilers and temporary diesel generators.

- 3.4 The EIA will be assessed by the ODA PDT in accordance with the EIA Regulations 1999. In addition to the further information required under Regulation 19, additional supplementary information has also been submitted. This additional information covers minor amendments to the scheme since the February 2007 applications which are a result of further detailed design, the correction of minor errors and an update on the status of relocation programmes for businesses, travellers, Clays Lane residents, Eastway Cycle Circuit, Manor Gardens Allotments and the Bus Depots. This supplementary information is also in response to comments raised throughout the consultation process, including comments by the relevant hosting boroughs.

Amendments to the Scheme

- 3.5 Since the submission of the planning application in February 2007 the further detailed design has evolved and a number of minor revisions have been made to the proposals. Amendments as they relate to the London Borough of Tower Hamlets are as follows:
- Bridges: five bridge changes including the raising of Bridge L03 in Planning Delivery Zone (PDZ) 4 (within the London Borough of Tower Hamlets) due to a conflict with existing rail infrastructure.
 - Retaining walls and reinforced slopes: the removal of a small retaining wall in PDZ4 as it is considered to be part of the wing wall of bridge H17.
 - Demolition: a number of buildings on the western bank of the Lea Navigation to be demolished in PDZ4 in order to accommodate bridges to improve links to the west.
- 3.6 As a consequence of the amendments to the scheme the descriptions of development have been revised for the planning applications. Generally these changes could be described as minor and have very little material impact.

4. ISSUES

The following section of the report addresses the issues previously identified by the London Borough of Tower Hamlets and sets out:

- The initial recommendation of the London Borough of Tower Hamlets (A copy of the original report of March 2006 is provided at **Appendix C**);
- Summaries the response provided by the ODA; and
- Sets out the revised recommendations of the London Borough of Tower Hamlets and states if concerns have been satisfied, suggests conditions where appropriate, and/ or identifies the requirement for further information when details are submitted for approval in future submissions.

Issue 1: Commitment to Sustainable Regeneration

London Borough of Tower Hamlets Initial Recommendation

- 4.1 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.

Urban Design & Connectivity

- 4.2 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.
- 4.3 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.
- 4.4 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.
- 4.5 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.
- 4.6 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.

- 4.7 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

- 4.8 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

- 4.9 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.

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

- 4.10 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

- 4.11 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.
- 4.12 Guarantees should be sought that areas designated as legacy communities will include sufficient open space to meet the standards set by the London Plan.
- 4.13 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.

ODA Response

- 4.14 The ODA response to these matters is contained within Volume 11 of the further information submitted which deals with consultation responses or other matters not raised in the regulation 19 response.

Approach to Legacy Communities

- 4.15 Two main matters were raised regarding 'Legacy Communities' elements of the proposals. Firstly, ensuring that the Legacy Masterplan Framework is coordinated with regeneration initiatives outside the Olympic Park to deliver: compatible development schemes, permeability of the Park with surrounding communities and linkages to local business support and inward investment initiatives in the wider area. Secondly, providing clarity that the legacy development platforms are appropriately scaled for future sustainable 'Legacy Communities' development and that the Legacy transformation infrastructure (including road layouts and access points) will not pre-empt the layout, form and content of the future legacy communities.
- 4.16 The Commitment to Sustainable Regeneration (CSR) explains the ODA and LDA's commitment to ensure that the Olympic Park provides a benchmark for high quality, well-planned and comprehensive development of the Lea Valley. The term 'Legacy Communities' is used to describe the development that will take place around the retained Legacy facilities to provide new homes, work space, schools, health and other community facilities.
- 4.17 It is proposed that the nature, scale, layout and form of the future sustainable legacy communities will be addressed in a Legacy Masterplan Framework (LMF), which will be an integrated spatial masterplan to assess the key physical, economic, social and environmental benefits of the legacy communities uses.
- 4.18 The LMF vision set out in the CSR indicates that the legacy communities will need to be easy to move through and well connected to the surrounding areas, the Lower Lea Valley and the wider London area. The CSR identifies a number of commitments that will underpin the development of the LMF, these include the following:
- To structure the legacy communities as part of the existing [surrounding] urban areas to create a series of interconnecting communities and ensure that the existing communities benefit from the improved environment, services and facility, employment and housing opportunities [in the Olympic Park];
 - To consider the mix of land uses in regard to those provided in the transformed legacy facilities, and in proximity to the Legacy Park, and in particular to complement the type and range of facilities delivered as part of Stratford City developments and the improvements to Stratford Town Centre;
 - To provide a platform to create the context for a wide range of new and diverse employment business and training opportunities, providing opportunities for not only those moving to the new communities but also those in the surrounding communities;
 - To build on initiatives delivered through the Local Employment and Training Framework, which was launched by the LDA with the boroughs following the 2004 permission;
 - The definition of [legacy community] character areas will be determined in a holistic fashion including consideration of land use, design, character of open spaces and the surrounding built context;
 - To take account of the needs of new communities and also those of the existing communities in the surrounding areas to cater for different needs across age groups, genders and ethnicities.
- 4.19 It is the intention of the ODA and LDA that the legacy communities are integrated with the urban areas within the catchment area of the Park. In terms of consistency with existing and emerging regeneration initiatives, the LMF will be framed in the context of regeneration

objectives for the wider area as set out in the LLV Opportunity Area Planning Framework and development plan policy (as it pertains at the time).

- 4.20 It is important to note that the network of long term legacy Highways are not described in the 'Sitewide Illustrative Legacy Phase Masterplan' is not intended to be exhaustive. It is intended that the plan does not prevent further thinking as part of the development of the Legacy Masterplan Framework. The plan illustrates the parts of the Loop Road that will be retained and additional highways that will be required to ensure that the transformed facilities, employment areas and new homes are made accessible to all those who live work and visit the area.
- 4.21 This plan will establish the network of streets and buildings within the areas currently defined as 'remediated and serviced future development land' to create an integrated pattern of new development and an extension of the existing network of streets.
- 4.22 As part of the process to evolve the LMF, the design of the Legacy Highways will be subject to further review. This process may reveal opportunities, where appropriate, for additional parts of the Loop Road to be removed, realigned or downgraded to ensure the structure of the Legacy Communities development delivers the most appropriate response to the site and its context.

The Greenway

- 4.23 Several issues were raised regarding the lack of details on Greenway improvements including the retention of associated bridges, the ability to access the Greenway and continued use by pedestrian and cyclists during each phase of development.
- 4.24 The proposals contemplate improvements to and upgrade of the Greenway from West Ham Station to Victoria Park The improvement works will include (but not necessarily be limited to) the following works:
- Footpath / Cycleway upgrade and widening
 - Access ramps and steps
 - Lighting
 - Barriers & fencing
 - Street furniture including benches and bins
 - Vegetation removal
 - Planting
- 4.25 The works are intended:
- To mitigate the closure of Carpenters Road by providing a safe alternative route across the Olympic Park site for cyclist and pedestrians.
 - To help transform the section of Greenway from West Ham Station to Victoria Park into an area that is attractive and provides a safe, lit and welcoming environment for visitors and users.
 - Assist in providing a pedestrian route along the Greenway to transfer Games visitors and spectators from West Ham Station and Victoria Park to the Olympic Park.
 - To use the project to engage local communities to engender a sense of ownership of the Greenway.
- 4.26 A variety of works and treatments and alternative routes are proposed to the Greenway during the different phases of Olympic Games development these are summarised below.
- 4.27 Olympic Park Construction Phase
The proposed final diversion route for the closure of Carpenter's Road is via the Greenway

from Stratford High Street to Wick Lane. It will be lit during the early morning and evening commuter demand periods. The intention is to carry out wholesale improvements of this section by summer 2008, including landscaping, lighting installation, pathway and access ramp upgrades. In the interim period, between summer 2007 and summer 2008, a temporary route will be established along the Greenway from Marshgate Lane to Wick Lane and shall include temporary lighting and surface improvements. The route from Stratford High Street to the Greenway may change to accommodate construction activities and shall be Pudding Mill Lane, Pudding Mill Lane/ Marshgate Lane or the Greenway.

4.28 Games Phase

The section of the Greenway from West Ham Station to Stratford High Street will provide the main pedestrian access route to the southern entrance to the Olympic Park supporting approximately 20% of the daily visitor traffic. The eastern section from Old Ford Lock to St Marks Gate, Victoria Park will be used to connect the Olympic Park to Victoria Park; which will be used to host cultural events during the Games. There are proposals to upgrade both of these sections.

4.29 The remaining section of Greenway, from Marshgate Lane to Old Ford Lock, would be closed to the public during the Games period but used by operational personnel.

4.30 Legacy Phase

The improvement works proposed would enable this section of the Greenway route to be used in Legacy as a linear urban park and cycleway.

Open Space Provision

4.31 If granted, the 2007 planning applications will replace the 2004 planning permission that supported the London 2012 bid. Between 2004 and 2007 a number of strategic moves were made that have helped to reduce the land required for the Games and improved the economic and social viability of their legacy. These moves have meant the area of land requiring planning permission for the Games was reduced from 274 hectares in 2004 to 246 hectares in 2007. Despite this, the core parklands area has remained broadly the same and the green 'lung' connections described above remain at the heart of the proposals.

London Borough of Tower Hamlets Revised Recommendation

Commitment to Sustainable Regeneration

4.32 In order to ensure long term sustainable development of the Olympic site and its integration with the surrounding context the principles of the masterplan framework and the ability to take it forward must be established from the outset.

4.33 Whilst an overall commitment to sustainable regeneration and the preparation of the Legacy Masterplan Framework (LMF) seeks to take forward development of future communities on the site and integration with the surrounding context, it is considered that the LMF and the principles established through this framework such as the road network, provision of bridges, etc, should be secured and delivered by the ODA in legacy. If not these features, which are required to ensure the development of future sustainable communities, will be left to uncertain mechanisms to achieve and thus may not be implemented. The boroughs must also be consulted on the principles of the LMF to ensure that the legacy communities proposed are cohesive with existing surrounding communities.

4.34 It is recommended that the principles and implementation of the LMF are secured through the planning permission for the Olympics and legacy. Prior to the commencement of the Olympic games the LMF must be approved and delivery of infrastructure secured to take forward the establishment of legacy communities.

Urban Design and Connectivity

- 4.35 Urban design and connectivity both within the site and surrounding communities is one of the most important considerations to be established in the LMF. The Olympic legacy will result in the development of a very large new park as well as the establishment of substantially sized communities. One of the most important elements of the Masterplan framework should be to ensure that the park and its communities are designed to high standards and ensure sustainable linkages/connectivity both through the site and to surrounding communities.
- 4.36 The London Borough of Tower Hamlets expressed a number of concerns in relation to the details provided on urban design and connectivity in the application documentation and the principles of the LMF, these concerns include:
- the alignment of the loop road and the impact upon future development,
 - ensuring that future proposals for the Olympic facilities such as the basketball arena and CCHP are designed to a high standard;
 - the lack of detail and commitment to providing bridges which will seek to connect existing communities to the site,
 - lack of detail on the detailed design of the greenway;
- 4.37 The London Borough of Tower Hamlets has expressed concerns regarding the location of the loop road and relationship to existing and future communities.
- 4.38 The ODA advice that the loop road is not considered to be a permanent structure (in some locations) and it is intended to remove the loop road and construct new roads in legacy which will service the legacy communities. A plan showing the removal of the loop road in legacy and detailing a new road running centrally through PDZ4 (within London Borough of Tower Hamlets) has been included in the transport assessment. This route is not yet designed or finalised as it will form part of the LMF. It is the intention of the ODA that once the LMF roads are finalised the loop road may be removed as it will no longer be necessary.
- 4.39 There is some infrastructure located under the loop road. In LBTH this is a water main which may act as a constraint to development at this location. The LDA are presently consulting with Thames Water on the exact location of this main and indeed it could be removed in the future.
- 4.40 Despite this any further development proposed in legacy could be designed around this constraint. If the water main was to remain this constraint would allow for any future development proposals at this location to be setback from the navigation providing for the establishment for additional open space with access to the water and provision of cycle and pedestrian networks at this location.
- 4.41 It is recommended that temporary planning permission for the loop road linked to its permanent replacement, be provided. On the completion of the LMF and finalisation of the road network in legacy the loop road should be removed, where appropriate. A section 106 agreement could set out the process and programme for conditions relating to this.

The Greenway

- 4.42 The Greenway forms a strategic east/west link between East Ham and Victoria Park, which will enable London Borough of Tower Hamlets residents to access the Olympic park, legacy communities and Stratford.
- 4.43 In response to the borough concerns regarding the lack of connection from this link into the legacy communities and Stratford the ODA has stated that they seek to work with stakeholders to facilitate general improvements in legacy to ensure that the Greenway acts as a sustainable connection.

- 4.44 In order to do this the ODA are developing a strategy for the entire route, from East Ham to Victoria Park. They are currently reviewing their options and a new option is to be submitted in the future. The ODA has asked for the boroughs assistance in taking this forward.
- 4.45 It is recommended that a strategy detailing improvements to the greenway is submitted prior to commencement of construction of Olympic venues. A second strategy would also be required to deal with improvements to the Greenway in legacy. Funding for these improvements would come from the ODA/LDA.

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

- 4.46 There will a total of 31 Bridges across the Olympic Site. Some of these bridges will be built for the Games and will be retained into Legacy. These "Permanent" bridges will be built to accommodate Legacy usage and not Games usage, and hence alongside the "Permanent" bridges will be "Temporary" bridges to accommodate the extra flow that will be generated during the Games Phase. Of the three bridges provided within the London Borough of Tower Hamlets, all are temporary.
- 4.47 The Olympics and Legacy will result in the construction of one of the largest parks in Europe featuring world class sporting facilities. The lack of commitment to the provision of adequate linkages into this park from surrounding communities in legacy is poor planning and will result in unsustainable outcomes.
- 4.48 Certainty is required to ensure that all residents can access the park and the legacy facilities such as the stadium and aquatics centre.
- 4.49 Outline planning permission is currently sought for a number of bridges. There is no clear mechanism for the three bridges within Tower Hamlets to be retained and replaced in legacy. Presently there is no clear commitment from the ODA to secure the provision of bridges on the site after the Olympics. It is sought that the provision of bridges will be determined in the LMF. The provision of bridges to the location of future legacy communities within PDZ4 must be secured following the conclusion of the Olympics event and on into legacy to ensure that London Borough of Tower Hamlets residents have access to the park. If the permanent bridges are reliant on legacy development provision to be provided then in the time between the end of the Olympics and the development of these sites the boroughs residents will not have access to the park.
- 4.50 The main issue for the London Borough of Tower Hamlets is pedestrian and cycle access for replacement bridges rather than for vehicles, as long as these linkages are maintained in legacy. Permanent structures should be put in place once the layout of the legacy road network is finalised as part of the LMF.
- 4.51 A commitment is required from the ODA to ensure that these bridges can be provided in legacy. It is essential that any planning permission granted secures the connectivity routes. This could be secured through a section 106 agreement or a condition of approval.
- 4.52 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 in legacy.
 - 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 or that a temporary structure is provided to bridge any gaps in time.

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

Open Space

- 4.53 The London Borough of Tower Hamlets was originally opposed to the net loss of open space within LBTH and sought compensation for this via section 106.
- 4.54 Following review of the further information submitted it is considered that the most favourable outcome for the borough would be to ensure that the open space provided both within the London Borough of Tower Hamlets and the remainder of the Olympic park is of the highest quality and that this space and its facilities are accessible to surrounding communities including London Borough of Tower Hamlets residents.
- 4.55 As discussed above, the LMF, relevant planning conditions and a section 106 agreement will seek to ensure that the open spaces created through the Olympics and its legacy are designed and implemented to world class standards and that access to these spaces and throughout the park is secured and adequately implemented.
- 4.56 The development platforms within Tower Hamlets which will be developed following the games will be subject to the Boroughs own open space and amenity requirements. Further development proposals on the development platforms will need to integrate with existing and proposed open space.
- 4.57 In order to ensure efficient management of the park and its facilities it is recommended that prior to the commencement of construction of the Olympic venues a park management plan is provided and a steering group formed for implementation. A park management plan would also be required in legacy to deal with management and day to day maintenance.

Issue 2: Sustainable Environment

Environmental Impact Assessment

London Borough of Tower Hamlets Initial Recommendation

- 4.58 It is recommended that Regulation 19 is used to ensure a more consistent and therefore accurate picture of environmental effects in this important document.
- 4.59 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.
- 4.60 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.
- 4.61 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.

ODA Response

- 4.62 The ODA has submitted further information pursuant to Regulation 19 of the EIA Regulations 1999.

London Borough of Tower Hamlets Revised Recommendation

- 4.63 The Environmental Statement (ES) and in particular the 'further information provided' 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 ES, individual conditions concerning mitigation measures need to be listed.
- 4.64 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. This seems particularly well thought out in terms of the employment, training and business objectives.
- 4.65 In terms of cumulative effects, the major developments as part of the London Thames Gateway have still not been assessed.

Biodiversity/Ecology

Initial View of London Borough of Tower Hamlets

- 4.66 The Council expects an overall net gain in biodiversity as a result of the Games.
- 4.67 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.
- 4.68 Appropriate mitigation measures need to be conditioned to ensure that minimum disruption is caused to trees which are proposed to be retained.
- 4.69 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.
- 4.70 The amount of excavation proposed across 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.

ODA Response

- 4.71 The ODA has Submitted a Biodiversity Action Plan to address the requirements of the regulation 19 request.
- 4.72 The biodiversity action plan seeks to provide a framework for habitat creation and management that will be developed with partners and stakeholders.
- 4.73 The document is guided by the overall vision and ecological design principles for the Olympic park which will seek to provide a high quality accessible green space for Londoners.
- 4.74 The intention of the plan is to conserve and enhance biodiversity during the construction phase and through to Olympic legacy. Whilst it is acknowledged that the areas of habitat will fall during site preparation and for the staging of the Olympics where practical existing habitats and wildlife will be safeguarded. Thereafter the Olympic park will be transformed to include increased habitat.

- 4.75 The action plan will be developed in accordance with the principles and recommendations of the code of construction practice and suitable development strategy as well as the London 2012 Biodiversity Strategy as well as international, national, London and borough policy.

London Borough of Tower Hamlets Revised Recommendation

- 4.76 The biodiversity action plan submitted goes some way to identifying issues and actions in relation to biodiversity on the site. It is recommended that mitigation measures should be secured through planning conditions to maximise the opportunities to retain existing or create new habitat in order to ensure establishment of maximum biodiversity in the Legacy Park.
- 4.77 It is noted that the biodiversity action plan would relate to a number of additional documents which would be produced as part of the LMP. The supplementary documents will deal with particular species and habitats as and when the full detail of design is available.
- 4.78 In order to ensure that the commitments made by the ODA will be implemented appropriate conditions must be required. This will ensure that whoever takes over responsibility for the Olympic Park in legacy will deliver the commitments made as part of the planning application proposals.

Issue 3: Making the Best Use of Waterways

Initial View of London Borough of Tower Hamlets:

- 4.79
- 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.

London Borough of Tower Hamlets Revised Recommendation

- 4.80 It is considered that the ODA has not responded to the boroughs aspirations for making the best use of the waterway network provided throughout the site. The information provided relates to amendments to the scheme based on flood information.
- 4.81 A lack of detail on this issue would suggest that there is lack of commitment by the ODA to utilise water transport during construction, in the Olympics and its legacy.

- 4.82 It is understood that whilst it may not be possible, for security reasons to utilise waterborne transport during the games (6 week period) great opportunities exist to establish towpath provision, boat mooring, wharfs and access facilities to promote waterborne transport for visitors, waste disposal and freight in legacy.
- 4.83 Wharfing and waterborne transport should also be provided and secured adjacent to the CCHP to ensure that sustainable freighting is used for supplies to the Energy Centre.
- 4.84 The details of this would need to be established and secured through the LMF however a hard edge is required in some locations throughout the site to promote waterborne transport and therefore this needs to be addressed as part of this application.
- 4.85 It is therefore recommended that a commitment to secure waterborne transport and access during all phases of the Olympics and legacy is secured through relevant conditions of approval or a Section 106 agreement.
- 4.86 It is recommended that the above measures be secured through relevant planning conditions detailed as follows:
- Waterborne transport to be explored in Olympics phase.
 - Waterborne Transport and Freight strategy to be established and implemented through the LMF.
 - At least 50% of supplies for the CCHP biomass boilers must be delivered to the site by water.

Issue 4: Renewable Energy & Sustainable Waste Management

Renewable Energy

Initial View of London Borough of Tower Hamlets

- 4.87 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.
- 4.88 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.
- 4.89 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.

ODA Response

- 4.90 The regulation 19 response details further information in relation to renewable energy.
- 4.91 Additional information states that the ODA Sustainability Strategy will seek to set energy efficiency targets. The ODA aims for the permanent venue structures to – post games- to be 15 % more energy efficient than 2006 Part L Building Regulations. The ODA aims for all permanent Olympic park venue structures post games to achieve a BREEAM Excellent rating. The environmental statement has taken this into account.
- 4.92 The ODA sustainability strategy indicates that it will seek to reduce the carbon intensity of the construction activities as part of its commitment to a low carbon development.

London Borough of Tower Hamlets Revised Recommendation

- 4.93 The London Borough of Tower Hamlets considers that the information provided in the environmental statement in relation to renewable energy is satisfactory. It is recommended that requirements for energy efficient targets be secured through relevant conditions of the planning permission.
- 4.94 In order to ensure sustainable energy production on the site for both the Olympics and in for the legacy communities it is considered that all permanent Legacy facilities and the Olympic Village be connected to the CCHP plant. It is also recommended that the plant be provided with the capacity to potentially provide energy to surrounding communities.
- 4.95 In addition the CCHP plant must be adaptable to new technology (such as fuel cells) as it becomes available.
- 4.96 The CCHP Plant would be powered through a combination of biomass and gas fired boilers which are powered through the burning of wood chips. It is recommended that if woodchips are going to be used to fire boilers that they be sourced from local suppliers and delivered to the site by water.
- 4.97 In relation to the proposed wind turbine, which is not located within the London Borough of Tower Hamlets, Councils Energy efficiency officer has recommended that the Wind Turbine project shall not commence until ODA commissions the Weather Met Office to produce a wind profile report to scientifically identify the best position (that has the most potential of wind energy) for the Wind Turbine at the Olympic site.
- 4.98 In relation to the impacts of the CCHP on Air Quality the London Borough of Tower Hamlets Air Quality Officer has noted that there is insufficient justification that emissions from the biomass boilers and temporary diesel generators would have “minor adverse” effects. These potential emissions (and cumulative effects) need to be adequately accounted for via a comprehensive air quality assessment. In addition there is no detail on the guidance used in the air quality assessment and how the applicant arrived at the significance criteria used to assess the pollutants.
- 4.99 It is recommended that the above measures be secured through relevant planning conditions detailed as follows:

- The applicant will submit a detailed energy strategy
- At least 15% of energy efficiency requirements provided to above 1996 Building Regulations
- All Olympic and legacy facilities must be connected and maintain their primary energy source from the CCHP.
- All public facilities within the legacy facilities and Olympic park to be powered by the CCHP plant.
- The capacity, operation and technology within the CCHP plant must be reviewed every 5 years after the Olympic Games to ensure that new technologies are implemented in order to ensure sustainable energy production throughout the area.
- Supplies for the CCHP plant biomass boilers must be sourced from local suppliers within the Greater London Area.
- At least 50% of supplies for the CCHP biomass boilers must be delivered to the site by water.
- The Wind Turbine project shall not commence until ODA commissions the Weather Met Office to produce a wind profile report to scientifically identify the best position (that has the most potential of wind energy) for the Wind Turbine at the Olympic site.
- A comprehensive air quality assessment must be submitted.

Waste

Initial View of London Borough of Tower Hamlets

4.100 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

ODA Response

4.101 As part of the regulation 19 response the applicant has submitted further information in relation to waste management.

London Borough of Tower Hamlets Revised Recommendation

4.102 On review of the waste management information submitted it appears that waste issues have still not been addressed beyond the construction phase.

4.103 There will be excessive amounts of waste (approximately 5-10,000 tonnes) generated on and in the vicinity of the site in both the Olympics Games Phase and in legacy. Provision for waste and recycling must be designed into the Olympics venues and a detailed waste and recycling management strategy is required prior to the commencement of the Olympics to ensure that waste and recycling is efficiently and effectively managed on the site and in the surrounding area. Further information is also required to detail waste and recycling facilities and management for legacy venues and communities. Any waste management strategy prepared for the site would need to be consistent with the East London Waste Strategy in order to provide for sustainable operation in legacy.

4.104 Most importantly given the commitment that this will be the most sustainable games in history there must be a commitment to recycling both during the Olympic games and in legacy. It is recommended that a requirement for the recycling of at least of 90% of waste generated on site be imposed as part of the waste management strategy.

4.105 It is acknowledged that waste during the games may be treated on site. It is recommended that this option is thoroughly explored and secured as a reserved matter.

4.106 Opportunities are also available for moving waste from the site via the site's many waterways and rail links. It is considered that targets should be set to move reasonable amounts of waste from the site (i.e. 50% by sustainable forms of transport).

4.107 It is recommended that the above measures be secured through relevant planning conditions detailed as follows:

- Waste management during the Olympics and in legacy should be addressed in the environmental statement as recommended in the regulation 19 request of the ODA PDT.
- Provision of waste and recycling facilities must be detailed in the Olympic and legacy venues. Provision for waste and recycling facilities must also be provided within open space areas to accommodate the needs of visitors to the site.
- Prior to the use of the Olympics venues a waste and recycling management plan for the site and surrounding area must be submitted and approved. The plan must detail the following:
 - All waste is to be treated on site during the Olympic Games.
 - At least 50% of waste generated on the site is to be recycled.
 - Where not possible to treat on site at least 80% of waste must be removed from the site via sustainable forms of transport.

The above requirements must also be ensured in legacy.

Issue 5: Traffic & Transport Considerations

Initial View of London Borough of Tower Hamlets

4.108 Previously the London Borough of Tower Hamlets Strategic Transport and Highways Departments provided extensive comments on the Olympic and Legacy applications.

4.109 Please refer to issue 6 on page 32 of the Strategic Development Committee Report of the 15th March 2007 for a detailed summary of the issues raised.

ODA Response

4.110 Under Regulation 19 of the EIA regulations the ODA has submitted further information as part of the Transport Assessment. This includes, further sensitivity tests for the transport assessment in relation to comparative effects and potential effects, further clarification and or assurance of assumptions and approach, further assessment and articulation on shuttle bus availability, junction capacity, remote public transport and highways impacts and accident/safety implications required. Further information is provided in relation to junction and highways analysis and mitigation schemes.

4.111 Information is also provided in relation to the OPTEM arrangement, and a travel plan strategy.

London Borough of Tower Hamlets Revised Recommendation

4.112 The London Borough of Tower Hamlets Highways department has assessed the material submitted as part of the regulation 19 response and provides the following comments and recommendations:

Maximum Construction Workforce

4.113 The Transport Assessment indicates that workforce transport will be at its peak during 2010, when the anticipated workforce access to the Olympic and Stratford City site would be in the order of 8,000 people. It further suggests that the highest increases will be in eastbound counter-peak traffic. This will affect the both the Central and District Lines, as well as bus

services on Stratford High Street, which includes buses travelling through Tower Hamlets. In addition an increase in patronage to Bow Road Station Underground Station which is located within Tower Hamlets is noted.

- 4.114 The westbound Central line and southbound Jubilee line are also identified as having increasing in patronage in the evening peak. The 2010 effects on public transport have been identified as moderate adverse.
- 4.115 There is concern from Tower Hamlets that the routes through the borough will suffer from increased public transport traffic, resulting in some over crowding at stations, slower bus journeys and overcrowding on some bus routes. With this potentially happening measures need to be in place before 2009 to ensure the following:
- Bus service schedules need to be improved to accommodate increases in patronage.
 - Bow Road station improved to cater for the increase in the number of trains at peak, the option of running a service from Aldgate East to Upminster only during this time
 - Station crowding needs to be monitored and improvements made to ticket barriers, ticket machines and platform facilities to cope with increases in numbers, particularly at Bow Road and Mile End Underground stations
 - Signage is required at the Bow Road Underground and DLR Station exit to route pedestrians to the Olympic site.
- 4.116 These measures will ensure that local residents and workers accessing the borough for employment are not suffering unduly as a result of the Olympic construction.
- 4.117 It is recommended that the above measures be secured through relevant planning conditions detailed as follows:
- Prior to 2009 Bow Road and Mile End Stations to receive improvements to ticket barriers and ticket machines to improve passenger flow, in addition to signage from the station to the Olympic site.
 - Prior to 2009 bus frequencies improved on services along Stratford High Street to accommodate increases in patronage as a result of the Olympic construction.

Mile End Station in Legacy

- 4.118 Details submitted indicate that there is some possibility of a negative effect on the Mile End interchange on evenings that there are events scheduled in the legacy venues; this is particularly the case in the PM peak due to increased crowding on the central line, and bus routes providing services to Mile End Station. The response has been that a Venue Management Strategy would require additional bus and train services to cater for the demand.
- 4.119 It is considered by London Borough of Tower Hamlets Highways that this is an inadequate response and that a venue management strategy providing details of increased services to deal with the increased pressure on public transport should be in place before Games Operation as the legacy venues are proposed to be operational by 2014 at the latest. This is only 2 years after the Games Phase; these years should be spent adapting the service, station and interchanges to accommodate the increases.
- 4.120 It is only with physical changes to the Mile End Interchange that crowds will be accommodated. The ticket hall will be unable to cope with increases in demand. In addition the pavements and crossing facilities around Mile End station are barely adequate at current peak. Any further increases will result in more overcrowding and danger to pedestrians at this busy vehicle cross roads.
- 4.121 Venue management is important but must be supported with physical changes prior to the opening of legacy venues.

4.122 It is recommended that the above measures be secured through relevant planning conditions detailed as follows:

- Prior to operation of the first venue in legacy, Mile End Interchange including station, ticket hall, public highways and crossings must be redesigned and constructed.
- Prior to operation of the first venue in legacy, a venue management strategy should be submitted and approved. The strategy should detail increased public transport services to deal with the increased pressure on public transport.

OPTEMS

4.123 The Olympic Park Transport and Environmental Management Scheme (OPTEMS) group was welcomed in the application, the further clarification in Volume 6A of the Regulation 19 response is also seen as a more positive move to setting up the OPTEMS system of mitigation measures.

4.124 It is considered that further clarification is required to ensure that the group is set up and is operational in an effective and timely manner.

4.125 It is recommended that the above measures be secured through relevant planning conditions detailed as follows:

- As soon as practicable, but at least prior to the construction of Olympic venues the OPTEMS group must be operational to ensure that mitigation measures in areas around the park and on roads serving the park are designed, funded and constructed in time for the Games Operational Phase.

Parking

4.126 Please see notes in Travel Plan section.

Travel Plan

4.127 The increase in detail provided in the Regulation 19 response is welcomed however it is considered that further clarification is required concerning the methods of implementation, responsibilities and monitoring. Where relevant it is recommended that these items of clarification could be addressed through relevant conditions of approval or obligations of a Section 106 agreement.

Construction Travel Plan

4.128 In order to ensure that transport implications are monitored and controlled during construction it is recommended that relevant conditions of approval and the requirements of a Section 106 agreement secure the details of a construction travel plan. Suggested wording of this condition is provided as follows:

- Prior to the construction of buildings a construction travel plan must be submitted and approved. Monitoring should be completed and reported to the Construction Management Group every 6 months. Any recommendations for changes or improvements in managing construction travel should be implemented within 3 months.

Games Phase

4.129 The work that has been completed on this section of the travel plan is acceptable. It is understood that the Olympic Travel Plan is the guiding document for the Game Phase. The detail supplied in the revisions provided in the regulation 19 response have increased confidence in the joint working between the Olympic Travel Plan and the Application Site.

Legacy Venues

4.130 As per the above the further information provided allows for greater confidence in the

aspirations, management and monitoring of the Travel Plan for the Legacy Venues. However there is still concern over the anticipated vehicle numbers and targets for some of the Legacy venues in operation, both day to day and in event use.

- 4.131 Day to day car mode for the Velodrome (70%), Multi-Sports Arena (40%), Hockey Venue (40%) and Tennis (70%), is considered to be excessive. It is appreciated that there are travel and equipment issues at these sites; but more innovative solutions such as specialist bus/mini bus services, equipment storage, equipment hire and rental, delivery consolidation services would assist in reducing these numbers.
- 4.132 Similarly, Event Use car numbers for some of the venues are extremely high. The Multi-Sports Arena in competition (30%) and concert (43%), Hockey (30%) and Velodrome (30%) are particular concerns. These areas are in PTAL value areas between 3 and 5. This is not significantly low. Again with more innovative measures, such as specialist bus/minibus transport from transport hubs, walking guides and walking umpires (that were used for the Manchester Commonwealth Games) would boost more sustainable travel.
- 4.133 It is stated for event parking that there will be a management plan and that spaces at the IBC/MPC may not be sufficient and other spaces would be sought. This is unacceptable. The Games has a commitment not to allow any visitor or spectator to arrive by car, excluding people with mobility problems. This should be extended to all legacy venues. This change in approach from Games to Legacy is contradictory and not a sustainable approach.
- 4.134 In relation to the residential development proposed in legacy the desire to have uniform parking standard for the Olympic site are very welcome. However the setting of the standard at current levels is poor. The Games are being billed as the most sustainable Olympics ever. The legacy should retain that statement. A 50% maximum car parking does not deliver this. It would be more appropriate to produce a non-car dependant site.
- 4.135 With this in mind a condition must be place on the permission that seeks to limit the car parking on site for residents to 25% maximum. This will not only increase the sustainability of the site, but will help lower congestion during event times at the legacy venues. Car parking allocation should be provided in those areas with the lowest PTAL. Those with higher PTALs should have no parking provided and be Car Free developments.
- 4.136 Car clubs, cycle sharing and car pooling schemes must be set up to mitigate this. This is mentioned in further detail later in the Travel Plan.
- 4.137 In addition residential service bays for deliveries and repairmen should be included in proximity to developments.
- 4.138 There is no mention of electric recharging points for vehicles in any residential development. This is not mentioned for any parking during Games or Legacy, whether office, residential or venue.
- 4.139 It is recommended that the above measures be secured through relevant planning conditions detailed as follows:
- Car parking on the site in Legacy shall be provided to the London Plan standards (this would require no car parking for legacy venues other than for specialist/disabled service parking). Alternative methods of transport in an around venues must be explored.
 - Prior to the operation of the first venue in legacy a ticketing strategy must be prepared to encourage visitors to the site to use public transport.
 - The parking standards for the residential legacy properties within the Olympic Application boundary must not exceed a maximum of 25% of residential dwellings having a car parking space.

- All parking provided on site must provide electric recharging facilities in at least 50% of vehicle parking spaces provided.

4.140 In general the improvements to the travel plan are welcomed. It is considered that there must be more attention paid to the legacy approach. With this in mind, any approval given should be restricted to approving only the Travel Plan up to Games Operational phase and all travel Plans for Legacy should be confirmed and re-appraised at the time the Legacy masterplan framework application is submitted.

Issue 6: Other

Retail, Leisure & Sport

Initial View of London Borough of Tower Hamlets

4.141 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.

London Borough of Tower Hamlets Revised Recommendation

4.142 It is considered that the applicant has not made a specific response to this matter in the consultation section of the additional information submitted in the application. This is disappointing and could be taken to indicate that there is no commitment from the ODA to ensure that the world class sporting and leisure facilities retained in legacy would be made readily available to London Borough of Tower Hamlets residents as well as to residents to other surrounding communities.

4.143 In discussions with the applicant it is advised that Sport England is one of the main consultees on the business plan for the legacy venues.

4.144 It is recommended that a Section 106 or other relevant agreement seek to secure the use of legacy sporting and leisure facilities and the Olympic park thus created through the permission by local residents. Access to legacy venues and facilities such as the main stadium and aquatics centre could be provided at a reduced rate to ensure that all members of the surrounding community have the opportunity to participate in leisure and sport and indicates a recognition of the inconvenience that the local community will have to endure during construction phases and the future operation of the venues.

4.145 In relation to park management/maintenance it is advised by the applicant that it is the intention to prepare and implement a Park Management Plan prior to the opening of the test events for the Olympic Games. It is recommended that this park management plan be submitted to and approved by the ODA prior to games operation phase. This plan would extend on into legacy and the life of the park in perpetuity.

Code of Construction Practice

Initial View of London Borough of Tower Hamlets

4.146 The London Borough of Tower Hamlets would expect full compliance with the council's construction code of practice.

ODA Response

4.147 Under Regulation 19 of the EIA regulations the ODA has submitted further information on the mitigation measures set out in relation to the Code of Construction Practice. (Vol 8). This includes measures to avoid, minimise and manage any unacceptable noise and vibration

effects along with specific information concerning construction and operational noise.

London Borough of Tower Hamlets Revised Recommendation

- 4.148 The London Borough of Tower Hamlets considers the Code of Construction Practice to be generally acceptable. The mitigation measures detailed are welcomed.
- 4.149 It is recommended that the code of construction practice and mitigation measures proposed is secured through relevant conditions of the planning permission.
- 4.150 In addition the following conditions in are recommended in relation to the Code of Construction Practice:
- Prior to commencement of construction a full list of enforcement measures that will be served to construction partners not adhering to the Code of Construction Practice should be submitted and approved by the Joint Planning Team.
 - As part of the Environmental Management Plan (EMP), further submit:
 1. A fleet management plan detailing construction vehicle types. This should include a schedule of all plant and equipment (including on-road vehicles) to be used. It should also include details of after-treatment technology applied to off-road mobile machinery.
 2. The Construction Transport Management Plan should also assess the effects of construction traffic on traffic flows on local roads within LBTH.
 3. The Construction Transport Management Plan should be submitted to LBTH Environmental Health (Air Quality Officer) for perusal.
 - The Pollution Incident Plan should highlight contact details for a site Environmental Manager for each phase of development, who can be contacted in the event of public complaints received by this department.
 - All commercial road vehicles used in the construction/demolition phase should meet the applicable European Emissions Standards at the time of construction and should not only comply with Euro 3 standards as mentioned in the current CoCP.
 - “Dust Control” – (i) CoCP or EMP details of dust depositional monitoring (methodology, locations etc) should be agreed with London Borough of Tower Hamlets. (ii) A Demolition Method Statement must be submitted prior to the commencement of works.

5.0 CONCLUSION

- 5.1 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 Observations Letter to the ODA PDT which is to follow the consideration of this report by the Strategic Development Committee.

Appendix A

Amended Description of Proposals

The development proposed within the Site Preparation Planning Application has not been revised from the February 2007 submission.

The Olympic and Legacy Transformation Planning Application is for development in connection with the 2012 Olympic Games and Paralympic Games and Legacy Transformation. The amendments to this description from the February 2007 submission are highlighted in bold.

Purposes for the Games, involving:

- 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 (including B1 / B2) and Multi Storey Car Park;
- Erection of a perimeter enclosure for the period of the works; and
- Temporary coach parking areas.

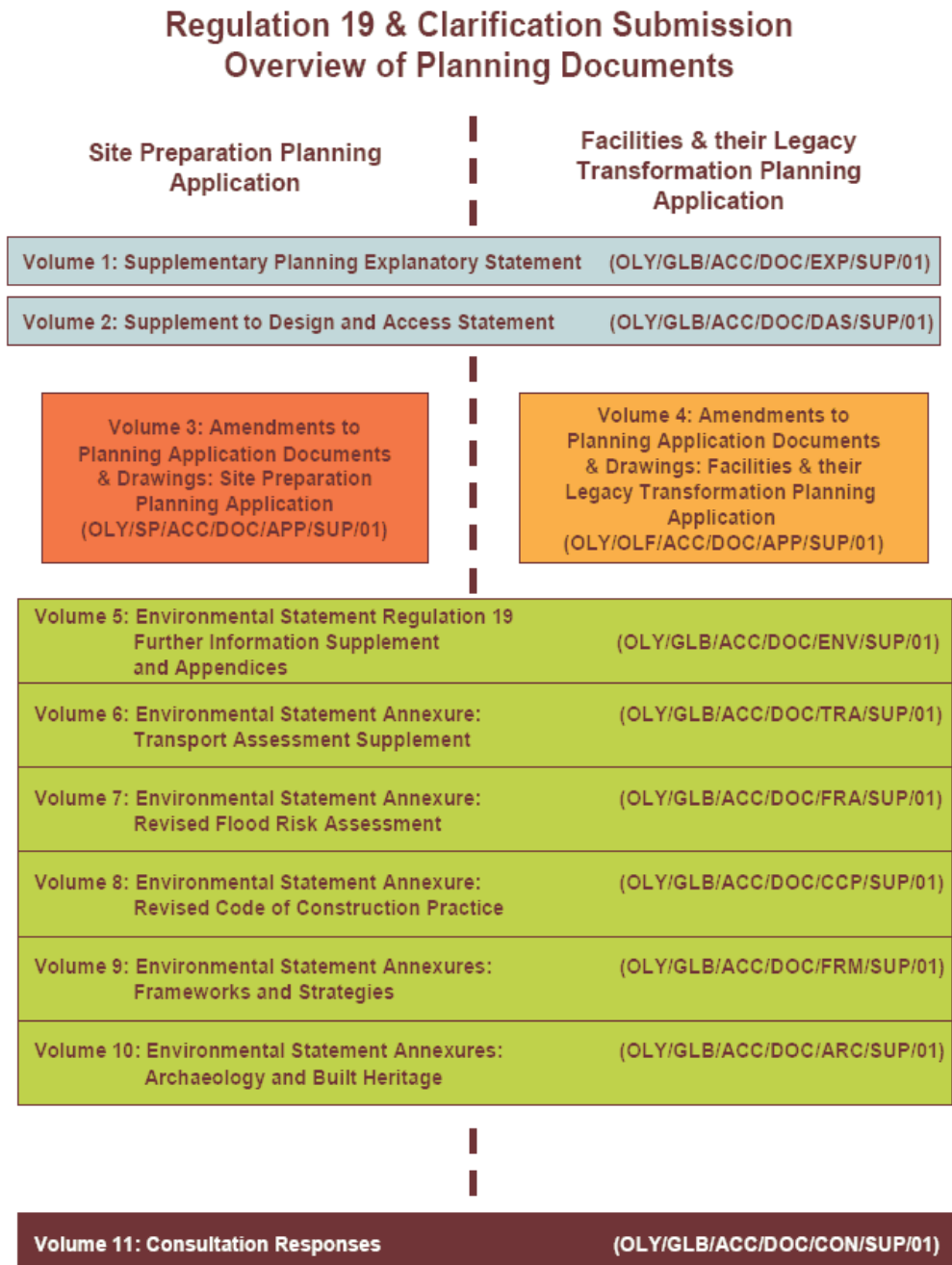
In the period following the Games, the Legacy Transformation Phase involving:

- Reconfiguration of road network to form Legacy distributor and local roads, cycleways, pedestrian footways and ancillary parking areas;
- Dismantling and reconfiguration to form buildings for use 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.

Appendix B

Documents Submitted with the Regulation 19 & Clarification Information

Figure 2: Overview of Planning Documents for Regulation 19 & Clarification Submission



Appendix C

Copy of Letter to the ODA PDT (March 2007) and Strategic Development Committee Report (15th March 2007) Containing the Initial Recommendations of the London Borough of Tower Hamlets

Development & Renewal

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

Town Hall (AH)
PO Box 55739
5 Clove Crescent
London E14 1BY

Vivienne Ramsey
Head of Development Control
Olympic Delivery Authority
Planning Decisions Team
Mailpoint 32B
23rd Floor
1 Churchill Place
London
E14 5LN

Tel (020) 7364 5257
Fax (020) 7364 5412
Email michael.kiely@towerhamlets.gov.uk

19 March 2007

Dear Vivienne,

TOWN AND COUNTRY PLANNING ACT 1990

TOWN AND COUNTRY PLANNING (GENERAL DEVELOPMENT PROCEDURE) ORDER 1995

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

RE: PLANNING APPLICATIONS TO THE OLYMPIC DELIVERY AUTHORITY PURSUANT TO ODA (PLANNING FUNCTIONS) ORDER 2006

I write with reference to the above applications and wish to submit the following observations on behalf of my Council. The Strategic Development Committee endorsed these observations on 15 March 2007. The London Borough of Tower Hamlets has considered the particular circumstance of these applications against the Council's approved planning policies contained in the London Borough of Tower Hamlets Unitary Development Plan, its emerging policies as contained in the draft Local Development Framework documents, associated supplementary planning guidance, the London Plan and Government Planning Policy Guidance/Statements. The Council raises no objection to the Site Preparation and the Athlete's Village (part) applications. The comments in this letter relate to the main Olympics and Legacy Transformation applications:

Overall summary of views

- In principle, the London Borough of Tower Hamlets is supportive of the Olympics and Legacy Development Proposals, but it must emphasise that such support is not unconditional. The Council expects the promises contained in the original Olympic applications, particularly around the quality of the legacy proposals, to be delivered in full. It is considered that more emphasis needs to be placed in the current applications on the establishment of sound and well-designed legacy communities and connectivity with existing surrounding communities.



2006 - 2007
Early Intervention
(Children at Risk)
2003 - 2006
Winner of 4 previous
Beacon Awards



INVESTOR IN PEOPLE



- 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 availability of these linkages in perpetuity. The retention of the Olympic park loop road in the legacy proposals is strongly questioned.
- Currently river, road and rail networks isolate the site. The lack of connectivity and safety concerns with the existing links is required to be addressed through improvements, including new bridges. The proposed bridges from the park to other parts of Fish Island and Bow are temporary with no firm commitment within the application 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.
- The proposals contain inadequate analysis of the optimum position for new bridges located within or landing in Tower Hamlets in legacy phase. Accordingly, their position and number within the application should be seen as illustrative, until that analysis is carried out. Such analysis should look at the planned changes outside of the site, as well as the requirements of the development itself, so that the aims of proper connectivity and place making are delivered successfully.
- The design of the 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 is unacceptable. Despite the construction of a major land bridge, uninterrupted pedestrian and cycle traffic along the entire Greenway will not be achieved. 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.
- The CCHP building and the adjacent sub-station are substantial buildings located in prominent positions within the Olympic Park close to Victoria Park. The highest quality of design and architectural treatment will be required to ensure that these buildings contribute positively to the area. It is perhaps telling that the visualisations of the Park that have been produced do not include this building, and in particular the flue stack.
- The level of public open space within the development has reduced significantly since the last application. The previous scheme represented an acceptable balance between loss of Metropolitan Open Land, acceptable replacement and additional provision for the large new communities that were proposed. The current application does not contain that balance and results in an overall loss of MOL and accessible open space.
- The proposals result in the loss of active allotments and no acceptable replacement site has been secured in the context of the proposals. This adds to the loss of "green" amenities that residents of the surrounding areas will suffer over the course of many years and possibly in perpetuity.
- Public access to the canal environment will be important in legacy and the proposals do not make it sufficiently clear how this will be provided and secured.
- The development has secured the removal of power lines and their associated pylons from this part of the Lea Valley; which is welcomed. However, the application proposed a network of 35-

metre high telecommunication masts across the site; many of which will be retained in legacy. This is regretted from an urban design point of view and a less intrusive solution to the provision of telecommunications must be negotiated and secured.

- 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 of 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.
- 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. In particular a clear commitment should be given to service the Energy Centre by water as far as is practicable.
- Appropriate conditions and Section 106 (or other relevant legal agreement) package must be established to ensure that the various mitigation of harm/compensation for loss measures and commitment to the delivery of facilities and infrastructure during the games and in legacy are secured.

Further Details of Urban Design Concerns

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 and bridges 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 skeleton to support the future development of these areas. 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 completely unacceptable.

Addressing these fundamental shortcomings in the application will be challenging and difficult at this late stage. The only practical way to address this issue is for the application to be amended so that the legacy elements are reduced to being illustrative at this stage, and they can then 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 should be controlled through a Grampian condition linked to the first use of any of the retained facilities, such as the retained stadia, aquatics centre, media centre and the athletes' village. The pre-commencement elements in the Grampian need to be significant in order to give a proper level of control over the delivery of the connectivity infrastructure. This would mean that the post-Olympics alteration of any permanent facility could not take place until the legacy proposals have been submitted and approved. The facility could not be first used, post-Olympics until the approved legacy infrastructure proposals have been provided.

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 must 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.
- A proper analysis of the best location for and optimum number of bridges needed to integrate properly the new communities to existing areas; many of which will be undergoing significant change.
- 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.
- Revising the application to reflect the land use designations in the Leaside Area Action Plan and LLV OAPF.
- 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.

Regulation 19 Issues

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 ES Clarification 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 current proposals represent a significant reduction in the amount of open space proposed in the previous scheme, which is not acceptable.
- 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 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.
- Greater clarity and precision about access to canals is needed. It is vital that the fullest public access to canal towpaths, locks etc is secured as a result of these developments.

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 subsequent minutes of the meeting.

Should you have any further queries in relation to this matter, please contact Rachel Blackwell on 020 7364 0436.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Michael Kiely', with a long horizontal stroke extending to the right.

Michael Kiely
Head of Development Decisions

This page is intentionally left blank

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 London Borough of Newham 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 Forrest.

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 the 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 Decision” 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 Design Requirements
DEV2 Environmental Requirements
DEV7 Protection of Strategic Views

DEV8	Protection of Local Views
DEV45	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 LLVOAPF 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 at 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 objectives and commitment 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 aim 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-ordinated 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 councils 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 beginning. This should be a condition of the planning permission.

Revenue Support

Explanation:

- 7.92 In light of the responsibilities the Council 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 it has 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 Olympics 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 construction.
- 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 now 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 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.

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.

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 Borough's 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

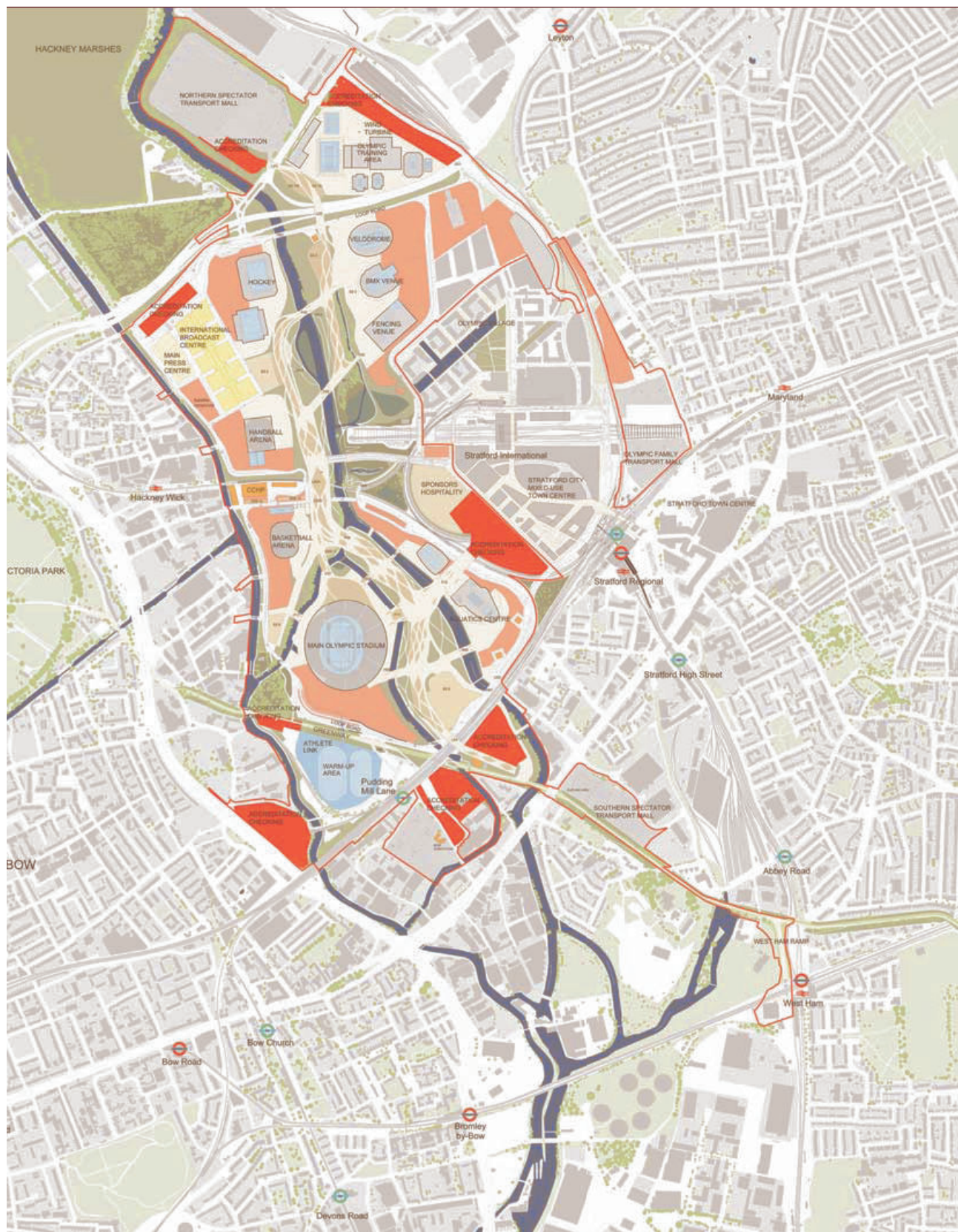


Fig 3. Illustrative Paralympic Masterplan

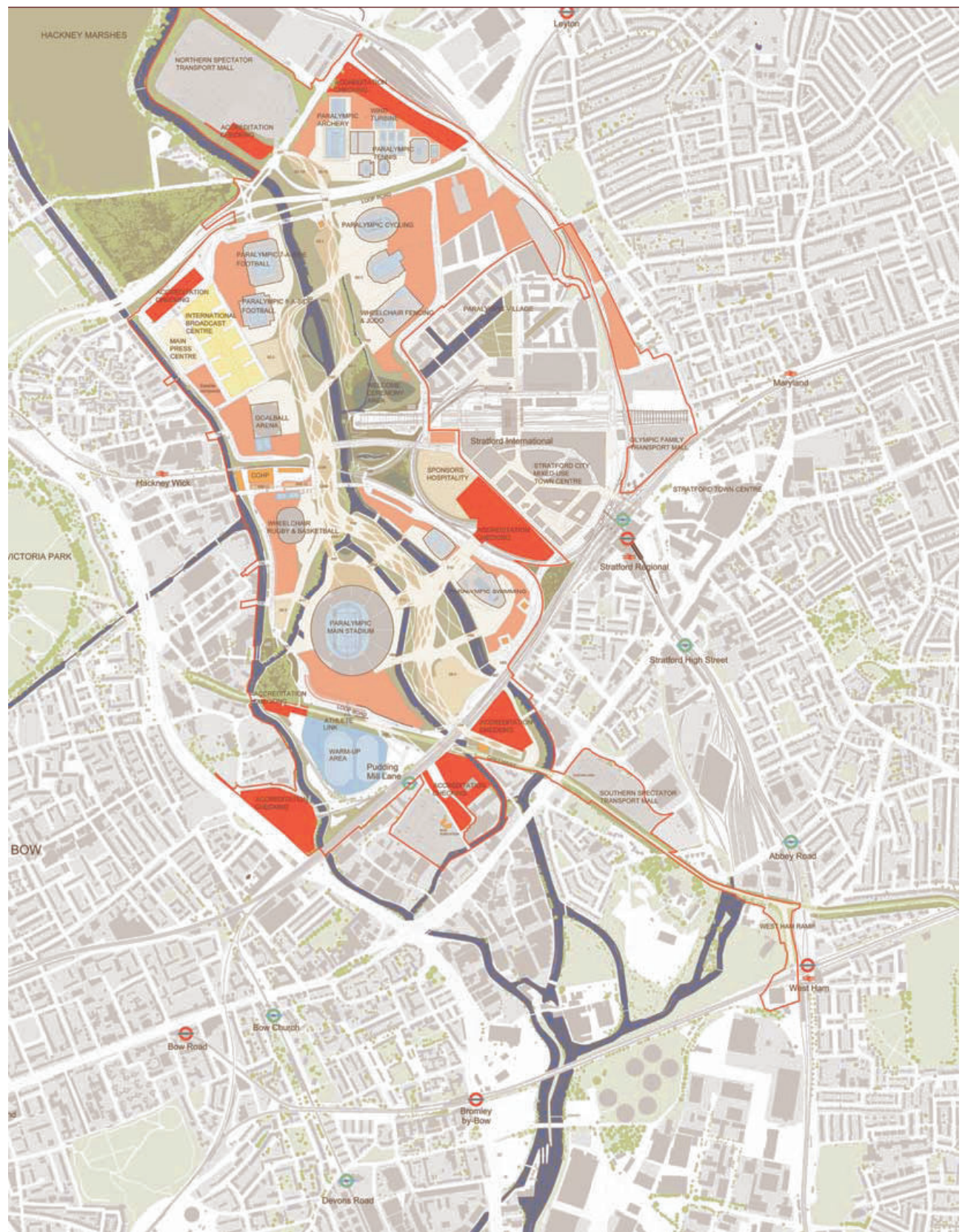


Fig 4. Illustrative Legacy Masterplan



This page is intentionally left blank

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.

This page is intentionally left blank

Appendix E

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

Masterplan Element	Summary of Principal Changes
Venues	
<i>International Broadcast Centre & Main Press Centre</i>	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.
<i>Volleyball</i>	Volleyball is no longer required in the Olympic Park.
<i>Velodrome & BMX</i>	The Velodrome and BMX track have been moved to the south of the A12.
<i>Fencing</i>	The incorporation of a temporary Fencing Hall to a site north west of the Athletes' Village.
<i>Paralympic Tennis and Archery</i>	Paralympic Tennis and Archery have been moved to Eton Manor and are retained in Legacy, alongside Hockey facilities.
<i>Basketball</i>	The temporary Basketball Hall has been moved to the western side of the Olympic Park in Delivery Zone 4.
Athletes' Village	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.
Chobham Farm	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.
Temporary Coach Facilities	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: <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.
Renewable Energy & Utilities	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.

This page is intentionally left blank

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; 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.

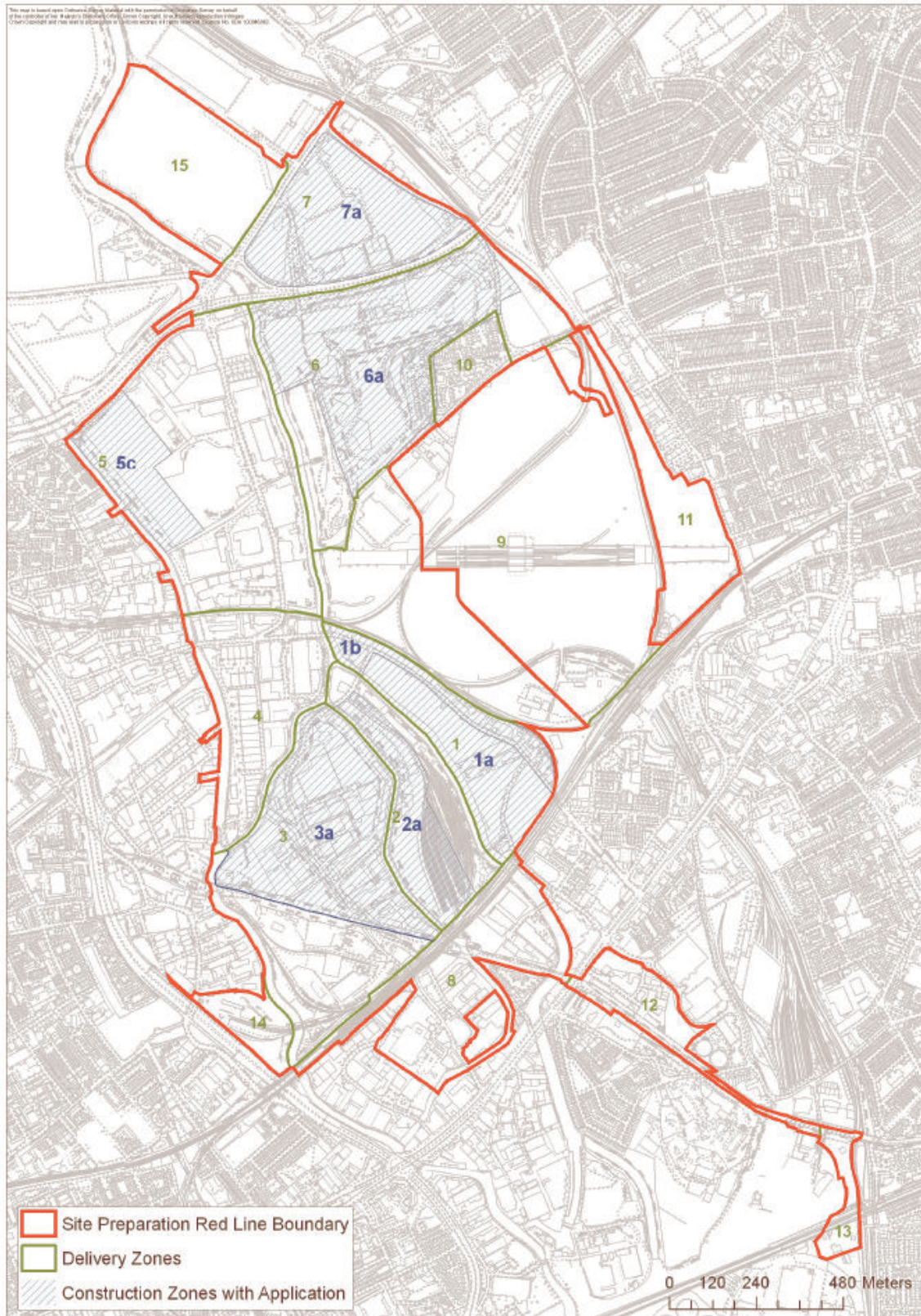
Although the site is presently in residential use and analysis of the history of the site and previous land uses results in a high risk of ground contamination. A substantial amount of remediation is required for the land to be suitable for residential development.

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



This page is intentionally left blank

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

CONTENTS

SECTION A

Overview

- 1. Aspects that are welcome**
- 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 it 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 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 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.

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

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.

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

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

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

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:

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

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

<u>Index</u>	<u>Page</u>
Olympic and Legacy Travel Plan Group	2
Highway Mitigation Measures	3
Revenue Support	4
The Existing Situation 2006	5
Highways	5
Public Transport	7
Walk/Cycle	8
Site Enabling and Construction	10
Highways	10
Public Transport	14
Walk/Cycle	15
London 2012 Olympic Games and Paralympics	17
Highways	17
Public Transport	22
Walk/Cycle	25
Olympic and Legacy Facilities Transformation (2013/14)	27
Highways	27
Public Transport	33
Walk/Cycle	35
Olympic and Legacy Facilities Operational (2021)	37
Highways	37
Public Transport	38
Walk/Cycle	39
Travel Plan Framework	41
Bridge Design and Construction	43
Code of Construction Practice	44

Olympic and Legacy Travel Plan Group

Travel Plan Co-ordination

Volume 13a Section 1.3.16 identifies the need for committed 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 to 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 year's 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 need to be set up as soon as possible, preferably prior to construction work beginning. 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 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 the Council has 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 it would have been anticipated and reflect the impacts identified two years ago for treatment through the 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 where 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 of 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, need 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 where 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 experienced 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 vehicle, to include*
 - *A106 Ruckholt Road*
 - *Leyton Road and High Road*
 - *Stratford High Street*
- *Introduce management and enforcement of parking within residential area,; 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 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.

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 Buses' 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 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.

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 and 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 is part of the Olympic Family. At present it is 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, and delays as a result of the ORN and associated transport, local residents will be unable to access the bus network on 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 have 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, which 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 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 (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 is also expected to use park and ride services (13a – 6.17.2).

Parking for direct service coaches – those which 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 as 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 River 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, and 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 and 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 Olympics 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 buses 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 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 (2013/14)

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. However, 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 (staff + visitors)	Parking (staff + visitors)	Event Demand	Parking
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 construction.

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 Tredgar 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, particularly in 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 be 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 are 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 from 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, which 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 and 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) - This 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 short a 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 within 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 than 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

Head of Development Control
Vivienne Ramsey
Olympic Delivery Authority
Planning Decisions Team
Mailpoint 32B
23rd Floor
1 Churchill Place
London
E14 5LN

11 June 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 Practice.

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

This page is intentionally left blank

Agenda Item 8.3

Committee: Strategic Development	Date: 21 st June 2007	Classification: Unrestricted	Agenda Item No: 8.3
Report of: Corporate Director of Development and Renewal		Title: Planning Application for Decision	
Case Officer: Tim Porter		Ref No: PA/07/00241	
		Ward(s): Blackwall and Cubitt Town	

1. APPLICATION DETAILS

Location:	Alberta House, Gaselee Street, R Boyle Motor Engineering Ltd Site, Blackwall Way, And Brunswick Arms Public House, 78 Blackwall Way, London, E14
Existing Use:	Alberta House, Brunswick Arms Public House and Boyle Motors
Proposal:	Demolition of existing buildings for redevelopment to provide 133 residential units in buildings up to 25 storeys plus roof plant, 47sq.m of retail (A1/A3) use and 26sq.m of community (D1) use at ground floor level, with associated car parking, servicing & landscaping.
Drawing Nos:	P000, P001, P002, P100, P101, P102, P300, P301(A), P302, P303, P304, P305, P306, P307, P308, P309, P310, P311, P312, P313, P314, P315, P316, P317, P318, P319, P320, P321, P322, P323, P324, P325, P326, P330, P331, P332, P333, P334, P335, P340, P341, P342, P343.
Applicant:	Swan Housing Group
Owner:	Swan Housing
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, the Council's emerging Local Development Framework Submission Document, associated supplementary planning guidance, the London Plan and Government Planning Policy Guidance and has found that:

- a) In principle, the proposed development is acceptable, subject to an appropriate planning obligations agreement and conditions to mitigate against the impact of the development.
- b) The proposed development would result in a sustainable, high quality, high density, affordable housing scheme, including a good level and mix of market housing, that would contribute to the regeneration of the wider area and that is considered to be in the interests of good strategic planning in London.
- c) 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.

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		Eileen McGrath 020 7364 5321

- d) The proposed development would deliver regeneration benefits comprising: improved townscape; open space; community facilities; modern employment facilities; and new residential accommodation.

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. Affordable housing provision of 54% of the proposed habitable rooms with an 66/34 split between rented/ shared ownership to be provided on site
2. A contribution of £30,000 towards improvements to the Blackwall Way Park Bridge Link.
3. A contribution of £165574 to mitigate the demand of the additional population on health care facilities.
4. A contribution of £64426 to mitigate the demand of the additional population on education facilities.
5. Provide £40,000 towards open space improvements to relieve the pressure that will arise from the new dwellings on existing open space and recreational facilities within the Borough.
6. Completion of a car free agreement to restrict occupants applying for residential parking permits.
7. TV reception monitoring and mitigation;
8. Commitment towards utilising employment initiatives such as the Local Labour in Construction (LliC) in order to maximise the employment of local residents.
9. Preparation of a Travel Plan

3.2 That the Head of Development Decisions be delegated power to impose conditions on the planning permission to secure the following:

Conditions

1. Permission valid for 3 years.
2. Details of the following are required:
 - Samples of materials for external fascia of building;
 - Mock up of external cladding system module to be assembled on site;
 - Roof level parapet wall details (1:10 scale);
 - Typical balcony and cladding details (1:20 scale);
 - Ground floor public realm (including children's play space and cycle parking/ storage);
 - All external landscaping (including roof level amenity space) including lighting and security measures, finishes, levels, walls, fences, gates and railings, screens/ canopies, entrances, seating and litter bins; and
 - The design of the lower floor elevations of commercial units including shop fronts;
 - The storage and collection/disposal of rubbish

3. Landscape Management Plan
4. Parking – 5 car parking spaces (minimum 2 disabled spaces) and a minimum of 133 cycle spaces
5. Details of insulation of the ventilation system and any associated plant required
6. Archaeological investigation.
7. Investigation and remediation measures for land contamination (including water pollution potential).
8. Impact study of water supply infrastructure required.
9. Full particulars of the following:
 - Surface/ foul water drainage plans/ works; and
 - Surface water control measures.
10. Details of finished floor levels required.
11. No soakaways to be constructed in contaminated ground.
12. Details of the site foundations works.
13. Construction Environmental Management Plan,
14. The D1 use is to be limited to Class XV and XVI
15. Details of the proposed D1 uses, including hours of operation and delivery hours.
16. Details of the proposed A1/A3 use, including hours of operation and delivery hours.
17. Details of the A3 fume extraction system.
18. Detailed design and method statement for all ground floor structures, foundations and any other structures below ground level, including piling
19. No works below ground level shall be carried out when a tunnel boring machine (associated with Crossrail) within 100 metres of the site.
20. Air Quality Assessment
21. Biomass heating and renewable energy measures to be implemented
22. Implementation of noise control measures as submitted.
23. Implementation of micro-climate control measures as submitted.
24. Limit hours of construction to between 8.00 Hours to 18.00 Hours, Monday to Friday and 8.00 Hours to 13.00 Hours on Saturdays.
25. Limit hours of power/hammer driven piling/breaking out to between 10.00 Hours to 16.00 Hours, Monday to Friday.
26. Ground borne vibration limits.
27. Submission of details of brown and/or green roof systems.
28. All residential accommodation to be built to Lifetime Homes standard, including at least 10% of all housing being wheelchair accessible.
29. Access and circulation
30. 278 agreement to be entered into for Highway works surrounding the site
31. Any other condition(s) considered necessary by the Head of Development Decisions

Informatives

1. Section 106 agreement required.
2. Section 278 (Highways) agreement required.
3. Site notice specifying the details of the contractor required.
4. Construction Environmental Management Plan Advice.
5. Means of fire escape and relevant Building Regulations.
6. Environment Agency Advice.
7. Ecology Advice
8. Environmental Health Department Advice.
9. Metropolitan Police Advice.
10. Thames Water Advice.
11. Transport Department Advice.
12. Advertising signs and/or hoardings consent.
13. Contact the GLA regarding the energy proposals.

- 3.3 That, if by 21 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 Planning permission is sought for the demolition of Alberta House, Brunswick Arms Public House and Boyle Motors to provide 133 residential units in buildings up to 25 storeys plus roof plant, 47sq.m of retail (A1/A3) use and 26sq.m of community (D1) use at ground floor level, with associated car parking, servicing & landscaping (It is to be noted that during the course of assessment the applicant requested the flexibility of securing the commercial space for both A1 and A3 use. Any potential impacts from the A3 use are not considered to be greater than the previous A4 use that existed on this site. The use will be condition appropriately to minimise any potential harm upon the surrounding neighbours).
- 4.2 The Council previously received a similar proposal for redevelopment of Alberta House (by the same applicant) which was received 18 August 2006 (ref. PA/06/01501), for the demolition of existing buildings for redevelopment to provide 173 residential units in buildings up to 18 storeys in height with 298sq.m of retail (A1) and 80sq.m of community uses (D1) at ground floor level, car parking and associated servicing & landscaping.
- 4.3 There were a number of concerns with the scheme and as such, the applicant withdrew the application to amend the scheme accordingly. The current scheme is a new application that proposes various changes to the design, layout and overall unit numbers, in order to address the concerns raised.
- 4.4 The proposal will be split as three blocks, A, B and C. Block C, in the southern part of the site, will comprise a 7-storey building on the Boyle Motor Site. Block B, in the middle, is a part 8, part 9-storey residential building on the existing Alberta House site and block A, to the north, is a 25-storey tower with plant at the roof. The height of the tower will be approximately 75 metres. Residential accommodation will be located in all three blocks with the majority of social rented accommodation in blocks B and C. Block A (the tower) will accommodate private and shared ownership units and include ground floor retail and community uses.
- 4.5 The new accommodation can be summarised by number of units as follows:

	1-bed	2-bed	3-bed	4-bed	5-bed	total
social rent	8	15	13	4	2	42 (31%)
intermediate	9	9	5	1	1	25 (19%)
Market	25	25	16	0	0	66 (50%)
Total	42 (32%)	49 (37%)	34 (25%)	5 (4%)	3 (2%)	133 (100%)

- 4.6 The proposal will provide a mix of amenity space, including a toddler's playground and formalised communal open space areas, including a barbecue area. Two parking spaces are allocated on site for disabled users. There will also be 133 secure cycle parking spaces on site.

Site and Surroundings

- 4.7 The most recent proposed development directly adjacent to the site is that of New Providence Wharf, a new high-rise development of flats and commercial space including a 38 storey hotel with flats at upper level and an office block. Other high-density residential schemes are coming forward in this location including the Reuters communication site (proposed 17 storey tower), Virginia Quay and the Elektron residential development (3 tower scheme ranging from 21 to 24 storeys) and New Providence Wharf building C.

- 4.8 The application site forms an area of approximately 0.3 hectares located to the east of the Isle of Dogs. The majority of the site is currently occupied by the existing 5-storey residential block that is Alberta House. The remainder is occupied by a 2-storey public house (The Brunswick Arms) to the north of Alberta House and a garage repair unit to the south.
- 4.9 Alberta House was originally an entirely social housing block which has subsequently seen a reduction in the number of social rented tenants under the right to buy options. The current block is now vacant due to the relocation program conditioned to the sale of the site.
- 4.10 To the west of the site is a row of 2-storey Victorian terraces along St. Lawrence Street, which are locally listed. To the west comprises a 3 to 6-storey residential development on Gaselee Street. To the north of the site is the purpose built 6-storey 'Ibis' Hotel. To the east side by the New Providence Wharf development, a new high rise development of flats and commercial space, including a 38 storey hotel block. Whilst this is still under construction, the main residential blocks A (13 to 19 storeys) and B (8 to 11 storeys) have been completed. Block B sits adjacent to Alberta House on the eastern side of Blackwall Way. To the south is the recently completed 'light house' residential scheme. A 7 to 13-storey development, with commercial units at ground level. The 7-storey element immediately abuts the site to the south.
- 4.11 The site benefits from a public transport accessibility level of 4, being a few minutes walk (250 metres) from Blackwall Docklands Light Rail station providing connections to the West End, the City, Stratford and City Airport. Bus stops exist on Prestons Road (2 minute walk) running in both directions providing connections around the borough to Canary Wharf, Mile End, Wapping, Whitechapel, Bethnal Green and Canning Town.

Planning History

- 4.12 The following planning decisions are relevant to the application:

TH7424/1071 The current buildings on the Boyle Motor site originally received outline permission on 29th July 1968 for the erection of a single storey repair workshop'. This appears to have been superseded by a further full planning permission for the 'erection of a single storey building to be used as a repair workshop on the site at the corner of St. Lawrence Street and Blackwall way' dated 13th June 1969.

PA/03/01611 On the 14th April 2004, the Development Committee resolved to grant planning permission for the demolition of existing motor repair workshop shed and erection of a four to six storey building consisting of 11 residential units and car parking. The ground floor unit contains a 52 sqm work studio for B1 use. The S106 legal agreement was not completed and the planning permission was not issued.

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:		Flood Protection Area Strategic Riverside Walk Road Safeguarding
Policies	DEV1 DEV2	Design Requirements Environmental Requirements

DEV3	Mixed Use development
DEV4	Planning Obligations
DEV6	High Buildings Outside the Central Area Zone
DEV12	Provision of Landscaping in Development
DEV18	Art and Development Proposals
DEV48	Strategic Riverside Walkways
DEV50	Noise
DEV55	Development and Waste Disposal
DEV51	Contaminated Land
DEV55	Development and Waste Disposal
DEV69	Water Resources
EMP1	Encouraging New Employment Uses
EMP2	Retaining Existing Employment Uses
HSG1	Housing Targets
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
T2	Bus Priority Measures
T3	Provision of Additional Bus Services
T15	Transport and Development
T16	Impact of Traffic
T17	Parking Standards
T18	Pedestrian Safety and Convenience
T20	Pedestrian Movements Along Canals
T21	Existing Pedestrians Routes
T23	Safety and Convenience for Cyclists
S6	New Retail Development
S7	Public House
S10	New Shopfronts
OS2	Access to Open Space
OS9	Child Play Space
U2	Consultation Within Areas at Risk of Flooding
U3	Flood Defences
U9	Sewerage Network

Emerging Local Development Framework Core Strategy Document November 2006

Proposals: Flood Risk Area
Draft Crossrail Boundary

Policies: 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
CP15 Range of Shops
CP19 New Housing Provision
CP20 Sustainable Residential Density
CP21 Dwelling Mix
CP22 Affordable Housing

CP25	Housing Amenity Space
CP27	Community Facilities
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
CP41	Integrating Development with Transport
CP42	Streets for People
CP43	Better Public Transport
CP46	Accessible and Inclusive Environments
CP47	Community Safety
CP48	Tall Buildings
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
DEV13	Landscaping
DEV14	Public Art
DEV15	Waste and Recyclables Storage
DEV16	Walking and Cycling Routes and Facilities
DEV17	Transport Assessments
DEV18	Travel Plans
DEV19	Parking for Motor Vehicles
DEV20	Capacity of Utility Infrastructure
DEV21	Flood Risk Management
DEV22	Contaminated Land
DEV24	Accessible Amenities and Services
DEV27	Tall Buildings
EE2	Redevelopment /Change of Use of Employment Sites
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 Provision of Affordable Housing
CON2	Conservation Area
CON4	Archaeology and Ancient Monuments
CON5	Protection and Management of Important Views
IOD2	Transport and Movement
IOD3	Health Facilities
IOD4	Education Provision
IOD5	Open Space
IOD7	Flooding
IOD8	Infrastructure Capacity
IOD9	Waste
IOD10	Infrastructure and Services
IOD23	East India South sub-area

Supplementary Planning Guidance/Documents

Designing Out Crime
Residential Space
Landscape Requirements

Spatial Development Strategy for Greater London (London Plan)

2A.1	Sustainability Criteria
3A.1	Housing Supply
3A.2	Borough Housing Targets
3A.4	Housing Choice
3A.7	Affordable Housing Target
3A.8	Negotiating Affordable Housing
3A.15	Social Infrastructure and Community Facilities
3A.24	Floor Targets
3C.1	Integrating Transport and Development
3C.2	Matching Development to Transport Capacity
3C.22	Parking
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
4B.9	Large scale buildings, design and impact
5C.1	The Strategic Priorities for East London

Government Planning Policy Guidance/Statements

PPS1	Delivering Sustainable Development
PPS3	Housing
PPG13	Transport
PPS22	Renewable Energy
PPG24	Planning & Noise

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 Highways

6.2 The car parking levels for this site are acceptable. Cyclists are adequately provided for in this

development, the cycle spaces are at 1:1 according to the LDF and there is additional space for visitor parking.

6.3 The service area off Gaselee Street is acceptable for refuse storage collection and for servicing of the site. Refuse from other areas in the scheme is in acceptable locations.

6.4 Section 106 to include:

- Car Free (OFFICER COMMENT: PCOP supported this agreement).
- £30,000 to TFL for bus stop on Blackwall Way (OFFICER COMMENT: The GLA stage 1 report does not identify a contribution towards this and as such, is not considered reasonable. This was supported by PCOP).
- A contribution to Blackwall Park Bridge Link (OFFICER COMMENT: PCOP supported the provision of £30,000 to this project).

6.5 Section 278 to include:

- Paving reinstatement and new provision around all frontages of the site, to include drainage, lighting columns, kerbs
- Provision of crossovers for parking and service turning circle on Gaselee Street
- reinstatement and provision of parking bays , including signage, street markings and necessary Traffic orders
- provision of loading bay near to local shop

(OFFICER COMMENT: This has been addressed by condition).

LBTH Environmental

Contaminated land

6.6 The proposal is acceptable subject to conditions.

Air Quality

6.7 The proposal is acceptable subject to conditions.

Noise

6.8 The proposal is acceptable as the applicant has advised that the site is on NEC "B". However Environmental Health will still require the glazing specification to be provided to internal standards of BS8233

Sunlight

6.9 Environmental Health is satisfied that the conclusions on made within the sunlight/daylight report, including the shadow analysis for 21st June, 21st September and APSH, are acceptable for planning permission.

Microclimate

6.10 The micro-climate study is acceptable subject to conditions.

LBTH Housing

6.11 The scheme exceeds the policy requirement for 35% affordable housing with 54% of affordable housing being provided by habitable room measurement.

- 6.12 The proposed tenure split is below the requirement for 80% social rented within the LDF policies. The current proposed split is 66% rented and 34% intermediate rent, which is more in line with the mayor of London's optimum split of 70/30. The high level of affordable housing compensates for the slightly skewed mix.
- 6.13 The scheme provides a good match with the Council's preferred unit mix for affordable housing (social rented and intermediate) housing specified in the LDF. The scheme provides 44.5% family units (3 bedrooms or larger) within the affordable rented housing, against the Council's target of 45%. 28% of the units in the intermediate element of the scheme are family units. In terms of the provision of three bed accommodation within the private mix, 16 three bed flats are provided (24%) against a target of 25%. Overall the scheme provides 31% of family housing.
- 6.14 A total of thirteen units are adaptable for wheel chair users which equates to 10% of the scheme. All the units are designed to "Life Time Homes" standard.
- 6.15 The developer, Swan Housing Association, has received a funding allocation to develop affordable housing on this site.

LBTH Cleansing

- 6.16 No response received.

LBTH Horticulture & Recreation

- 6.17 The provision for open space and for the play and informal recreation needs of the children and young people is much improved. However, this development will only exacerbate the existing open space and play / informal recreation deficiencies of the area. As such a development on this proposed scale cannot meet our planning requirements for open space and the play and informal recreation needs of children and young people of the development.
- 6.18 The site is within 750 metres of various parks. The London Plan and Council's Open Space Strategy and open space access standards call for new residential accommodation to comply with the 400 m (5 minutes walk) access standard to a local park.
- 6.19 The problem of accessibility to local parks is made much worse in this location than normal given the severance factors caused by the location of the site behind major roads and the DLR. The site is isolated within an area bounded by Prestons Road, Aspen Way and the river.
- 6.20 With access only to the proposed new pocket park at Virginia Quay Estate, residents of this proposed dense development, as well as other nearby developments, will be severely deficient in open space terms (OFFICER COMMENT: A contribution of £40,000 has been secured towards open space).

LBTH Corporate Access Officer

- 6.21 The Access Statement needs to state what good practice it was drawn up using (OFFICER COMMENT: This has been address by condition).
- 6.22 The Access Statement states that units could be built to life time homes standard at detailed stage. The statement should read that they will be (OFFICER COMMENT: This has been address by condition).
- 6.23 They should provide indicative plans of wheelchair units and examples of the different unit types so that an assessment can be made (OFFICER COMMENT: The revised plans show one unit has been design for wheel chair access. This is considered to be acceptable).

LBTH Ecology

- 6.24 Satisfied that the proposed development poses little risk to local biodiversity.
- 6.25 Opportunities should be taken however, to promote biodiversity through inclusion of features such as Flower beds with nectar-rich plants, bird boxes and bat bricks, this is also, recommended in the Ecological Survey. Where feasible, habitats and features to enhance the proposed development for utilisation by black redstarts should be incorporated into the design. For example, the installation of black redstart nest boxes and the creation of suitable ledges or nesting holes. (OFFICER COMMENT: Included as an informative).

LBTH Education

- 6.26 The education department identified a contribution towards the provision of 14 additional primary school places @ £12,342 = £172,788 (OFFICER COMMENT: Due to viability restrictions on the scheme, a value of £64426 has been allocated to education. This was agreed to by PCOP).

Tower Hamlets PCT

- 6.27 Based on 2 years revenue contribution, the PCT calculates that the proposal would generate a revenue and capital contribution requirement of £369,305 + £75,450 (respectively) = £444,755 (OFFICER COMMENT: Due to viability restrictions on the scheme, a value of £165574 has been allocated to health. This was agreed to by PCOP).

Greater London Authority (Statutory)

- 6.28 The application was considered as part of stage 1 referral by the Mayor 10 April 2007. The Mayor raised the following strategic concerns that require further consideration:
- *“The applicant is required to undertake further technical analysis regarding combined heat and power technology. The residential component of the scheme suggests it should be technically feasible to appropriately size a combined heat and power system to meet the baseline heat and electricity requirements for the site. Clarification regarding a cooling load is also required. In addition to these points, the applicant should discuss the options for linking the heating network into the proposed development at New Providence Wharf, Building C. Discussions, and an analysis into the feasibility of providing a linked network, with an energy centre, should be undertaken before this application is referred back to the Mayor.*
 - *TfL have provided detailed comments set out in report. The applicant will need to consider these and open discussions with the Council regarding section 106 contributions.*
 - *Further detailed work and clarification is also required on the design and provision of open space for the development. These matters are also set out report, in particular, a contribution to the upgrade of land north of New Providence Wharf to provide a new park, is sought. In this respect, Tower Hamlets Council should ensure that the section 106 funds would contribute to this upgrade”.*
- 6.29 (OFFICER COMMENT: The details of the GLA stage 1 referral report have been addressed under the relevant headings in this report).

Transport for London (Statutory)

- 6.30 Transport for London welcomes the car free approach to the development, save for the

provision of two disabled bays.

- 6.31 Access to on-street resident parking permits should be prevented by s106 agreement.
- 6.32 Given the limited parking availability in the area, TfL expect monitoring arrangements and mitigation measures to be put forward and included as part of the travel plan (OFFICER COMMENT: This is considered reasonable).
- 6.33 Further information regarding the number and routing of construction vehicles together with hours of working during the construction period is required.
- 6.34 All cycle parking should be covered and protected, as well as having security measures such as CCTV. TfL considers that a contribution should be made towards a new cycle lane along Blackwall Way. (OFFICER COMMENT: TfL did not identify a figure, and given the limited available funds, this request is not considered to be appropriate in light of more pressing needs within the Borough. This decision was supported by PCOP)
- 6.35 A contribution should be made to improve the pedestrian crossing at Preston's Way, in order to better accommodate desire lines (OFFICER COMMENT: Schedule 5 of the New Providence Wharf s106 (PA/00/267) agreement identifies a number of agreed highway works. In particular, reconfiguration of the road junctions of Preston Road and Yabsley Street and Baffin Way to accommodate the increase in pedestrian and vehicular traffic flows, including any consequent amendments to the existing Automatic Traffic Control Systems equipment at those junctions. Given the limited available funds for the proposed development towards s106, it would not seem reasonable to allocate funds to this work, given the existing allocated works. This decision was supported by PCOP).
- 6.36 Bus route 277 is being diverted to serve development in the area, although via Balfin Way rather than Yabsley Street. The developer should therefore consider repositioning the loading bay to the proposed retail store to avoid conflict with traffic (OFFICER COMMENT: This has been addressed).
- 6.37 The introduction of another bus service from South Quay via Balfin Street to Blackwall Way is being considered. To prevent rat running, Balfin Way may have to be made bus only and bus stops could be provided adjacent to the development. TfL requests a contribution towards feasibility work on this proposal (OFFICER COMMENT: The applicant has designated an area along Blackwall Way, adjacent to the site, for a future bus stop if required. A contribution towards feasibility work is therefore not considered to be reasonable. This decision was supported by PCOP).
- 6.38 TfL suggest that the developer be required to make a capped contribution towards improving the current subway as it will be an important route for the residents of the site (OFFICER COMMENT: PCOP advised that it would be more reasonable to allocate funds toward the proposed Blackwall Way Bridge Link).
- 6.39 In addition TfL request a capped contribution of £20,000 towards the installation of Docklands Arrival Information System (DAISY) boards which provide future Alberta House residents with real time information on DLR services departures from nearby Blackwall Station (OFFICER COMMENT: Given the residential nature of the development and the limited available funds, this request is not considered to be appropriate in light of more pressing needs within the Borough. This decision was supported by PCOP)

Docklands Light Railway

- 6.40 No comment received.

Greenwich Council

6.41 No objection.

Crossrail

6.42 No objection subject to appropriate conditioning.

National Air Traffic Service

6.43 No safeguarding objections

London City Airport

6.44 No safeguarding objections

BBC

6.45 The issue of television and radio reception for nearby residents is not mentioned in the application. Though the BBC would like to see this matter considered, they suspect that surrounding properties are already shielded from terrestrial transmissions by the taller developments nearby. There is a reasonable chance that the surrounding residents are connected to cable. If this can be established, the matter may need little further investigation.

Thames Water Utilities

6.46 No Comment

Metropolitan Police

6.47 The recessed stairwells on the western boundary, and the lack of active frontages, may assist crime problems in this area.

6.48 Anything that is not secured within the amenity area will be ruined.

6.49 The building design may block any potential views in or out of the development.

London Fire and Civil Defence Authority

6.50 No comment received.

Environment Agency

6.51 No objection subject to appropriate conditioning.

CABE

6.52 No comment received.

7. LOCAL REPRESENTATION

7.1 A total of 13 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: 257 (including petition reps.) Objecting: 257 Supporting: 0
No of petitions received: 1 objecting containing 251 signatories

7.2 The following local groups/societies made representations:

- Coldharbour Residents Association
- Blackwall Way Residents Association

7.3 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 proposed density is in excess of both current and future policy guidelines and is out of context with the area.
- The scale and height of the proposed development is out of context with the surrounding environment.
- The level of parking is insufficient
- There will be a significant impact on the right to daylight and sunlight for existing neighbouring properties
- The design of the proposed building is out of context with the existing surrounding streetscape.
- There are potentially risks of structural damage to the north bound Blackwall Tunnel, which is located directly underneath the proposed site.
- The applicant has failed to demonstrate any market-led need or demand for the retail units, leading to the loss of a successful public house that was in demand and visited by the local community.
- There is insufficient open space for the residents in this area
- The amenity space will not be available for use by surrounding residents.
- The vehicles trafficking the footpath will clash with the vehicles parked outside 11 & 12 Gaselee Street
- Additional pressure on medical facilities
- Poor pedestrian access to Blackwall Station
- The development will result in anti-social behaviour, lead to congestion, and breach privacy.

7.4 The following issues were raised in representations, but they are not material to the determination of the application:

- The deliveries numbers during the construction phase is questionable.
- Bus routes should be reconsidered
- There are concerns regarding the enforcement of the car free section 106 agreement.
- Impose a section 106 agreement specifying that weekend work is not permitted.
- Impose a section 106 agreement to be part of the Considerate Constructors scheme.
- Impose a section 106 agreement to include permanent restrictions to allowable delivery hours.
- The Blackwall Way Residents Association has submitted representations to Council in respect of the Local Development Framework Isle of Dogs Area Action Plan. The content of the submission seeks to amend the DPD to include part of the subject site as a communal green area or communal centre.

8. MATERIAL PLANNING CONSIDERATIONS

8.1 The main planning issues raised by the application that the Committee must consider are:

- Land Use
- Building Height and Design
- Density

- Amenity
- Housing
- Open Space
- Transport
- Energy
- Biodiversity
- Planning Obligations

Land Use

- 8.2 Planning permission is sought for the demolition of Alberta House, Brunswick Arms Public House and Boyle Motors to provide 133 residential units, 47sq.m of retail (A1) use and 26sq.m of community (D1) use.
- 8.3 In accordance with the Proposals Map associated with Adopted UDP and emerging LDF, the entire Site is undesignated.
- 8.4 The Adopted UDP and emerging LDF also identify the Site within Flood Protection Areas.
- 8.5 The Adopted UDP identifies part of the site for Strategic Riverside Walk and Road Safeguarding. However, the emerging LDF, which reflects the Council's up-to-date emerging policy basis, does not identify these designations within the Site boundary. However, part of the site to the north falls within the Crossrail boundary.
- 8.6 Set out below is a summary of the adopted and emerging local planning policies that should be considered when assessing the merits of the proposal, particularly in relation to the abovementioned designations.

Housing

- 8.7 The proposal would provide 133 residential units, and is therefore consistent with the requirements of Policy HSG1 and Draft Core Strategy CP19 of the LDF which seeks to ensure that the Borough's housing targets is met. The London Plan housing targets (December 2006) for Tower Hamlets from 2007 to 2016 is 31,500 new homes.

Employment

- 8.8 Policy EMP2 of the UDP opposes development which results in a loss of sites currently in employment use, except where the loss is made good by replacement with good quality buildings likely to generate a reasonable density of jobs.
- 8.9 Policy RT6 of the emerging LDF opposes the loss of a public houses unless it can be demonstrated that:
- the loss will not create a shortage of public houses within easy walking distance (300m) of residential areas; and
 - following an active marketing exercise there is no reasonable prospect of reuse or refurbishment for an appropriate A class use, particularly on the ground floor of the site.
- 8.10 The proposed development accords with policy EMP2 by providing A1/A3 floorspace, which will serve the local community, as well as create new jobs.
- 8.11 With regards to local public houses, there continues to be local provision at the refurbished 'The Gun' public house and 'The Steamship' in Naval Row. Both are within 250m radius of the site. The Ibis Hotel opposite the Brunswick Arms also has a public bar. A site visit confirmed that the public house is currently vacant.

8.12 The GLA Stage 1 report make the following statement:

“The development requires the demolition of all existing buildings currently on site. This includes the loss of the Brunswick Arms public house to the north of the site. This loss is regrettable given it provides a community facility bringing activity to this part of Blackwall Way. On balance, however, the overall scheme will provide significant strategic planning benefit. The loss of the pub would be difficult to substantiate as a reason, on its own, for the refusal of this application”.

8.13 In considering the loss of the existing motor repair workshop shed (Boyles Motors), planning permission was previously given for its demolition for residential units. It was determined under Policy EMP2 of the UDP that, although development that will result in a loss of employment generating uses will be opposed, EMP2 (4) provides an exception to this requirement where the development will eliminate a use that cannot be made compatible with adjoining residential uses.

New Retail Development

8.14 Policy S6 states that planning permission for new retail development will normally be granted where it meets the policy criteria. The proposed development complies with the relevant criteria as follows:

- The proposed retail floorspace would not detrimentally affect the vitality and viability of District Shopping Centres.
- The development is in accordance with the Planning Standard No.3 (Parking, Loading, Circulation and Access Requirements).
- The development will be adequately served by public transport and includes safe and convenient access for pedestrians and cyclists as demonstrated in the Transport Assessment.

8.15 Policy IOD23 of the IOD Area Action Plan, retail use in this area is supported where it forms part of a residential-led development and of a scale and kind intended to serve the needs of the local resident population.

8.16 The applicant has advised that the retail unit is designed to accommodate a local convenience store which will not undermine the local retail provision. It has been demonstrated later in this report that the site is well serviced by public transport and encourages safe and convenient access for pedestrians and cyclists

8.17 Details of the retail and frontage in relation to materials and design cannot be finalised until a tenant is secured. In accordance with Policy S10 of the Adopted UDP, it is recommended that this is conditioned appropriately.

8.18 In light of the above, it is clear that the Proposed Development will accord with the Council's policy and long-term land use aspiration for the Application Site.

Community Facility

8.19 Policy SCF11 of the Adopted UDP states that the 'provision of new meeting places will be encouraged and promoted in association with appropriate redevelopment or refurbishment schemes in accordance with policy DEV4. The council will require meeting places to accord with the policies DEV1 and DEV2.

8.20 When determining the location of new social and community facilities, Policy SCF1 of the

Adopted LDF states that consideration should be given to:

- the likely catchment area of the facility;
- the accessibility of the site; and
- the needs of the area and the quality of the proposal.

8.21 The community space is considered appropriate in accordance with the above mentioned policies. Swan has advised that they will support local residents to support a community led organisation, which will facilitate the development of community activities from within the community space.

Tidal and Flood Defences Policy

8.22 Policy U3 states that the Council (in consultation with the Environment Agency) will seek appropriate flood protection where the redevelopment of existing developed areas is permitted in areas at risk from flooding. A Flood Risk Assessment and Flood Risk Breach Analysis are provided in support of the application. This assessment concludes that although the site is in an indicative floodplain, the existing ground levels are below the existing defence level of +5.18m OD, thus the site is protected by the Thames Barrier.

8.23 In accordance with DEV 21 of the emerging LDF, the development is not expected to increase the risk of flooding to the site, its surroundings and downstream.

8.24 The Environment Agency raised no objection to the scheme subject to appropriate mitigation measures. These will be enforced via planning conditions.

Building Height and Design

Tall Building

8.25 The site forms part of emerging group of tall buildings, with Ontario tower at its apex to the east. There are number of other tall residential buildings consented or at pre-application stage. Within this group, the tall building would be in line with this established cluster. Given this, the Council's Urban Design Officer has noted:

8.26 *"height by itself is not a concern. The articulation of this mass has been partly successful with distinct roof form, softening of edges with balconies and reduced foot-print. Applying English Heritage and CABE criteria for tall buildings and also DEV 27 (LDF submission document) the proposed design is broadly policy compliant, but needs further work at detail stage to translate planning drawings to a piece of excellent architecture".*

8.27 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 (DEV1 and DEV2).

8.28 CP48 of the emerging LDF permits the Council to consider proposals for tall buildings in locations outside the tall building cluster locations identified in this policy if adequate justification can be made for their development.

8.29 Policy DEV27 of the emerging LDF Core Strategy provides a suite of criteria that applications for tall buildings must satisfy. Inline 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 an appropriate design

- quality;
- it contributes to an interesting skyline;
- the site is not within a strategic or local view corridor;
- Ground floor plan creates useable communal amenity space, which would be accessible for various age groups and secure. The amenity space arrangements are considered to satisfy the Council's requirements;
- it meets the Council's requirements in terms of micro-climate;
- the proposal satisfies the Council's requirements in terms of impact on privacy, amenity and overshadowing;
- the design standards for each unit are mostly double aspect with ample private amenity space for most units;
- the proposed building footprint and layout reinforces the present East-West pedestrian routes along St Lawrence Street which continues onto New Providence Wharf. The proposed massing continues building edges with active frontage on either side;
- 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;
- impacts of the development on the telecommunications and radio transmission networks should be mitigated via an appropriate clause in the S106 agreement;
- the Site is located in an area with good public transport accessibility;
- the Council's Highways Authority have concluded that the transport assessments submitted satisfy the Council's requirements;
- the mix of uses proposed are considered appropriate;
- the design strategy is supported with an 'excellent' EcoHomes standard;
- appropriate planning obligations are included to mitigate the impact of the development on the existing social facilities in the area.

Design and External Appearance

8.30 The scheme maximises the opportunity to provide high - density, mixed-use development of a high architectural and urban design quality. The ground floor layout and building design has evolved dramatically in incorporating comments received from the Council.

8.31 Policy DEV1 of the UDP states that all development proposals should:

- Take into account and be sensitive to the character of the surrounding area in terms of design, bulk, scale and the Use of materials;
- Be sensitive to the development capabilities of the site, not result in over-development or poor space standards; be visually appropriate to the site and its setting;
- Normally maintain the continuity of street frontages, and take account of existing building lines, roof lines and street patterns; and
- Include proposals for the design of external treatments and landscaping.

8.32 Policy DEV2 of the LDF requires that all new development is required to be designed to the highest quality standards, incorporating principles of good design.

8.33 The GLA have made the following comments on the design of the scheme:

"The proposal is generally of high quality however there are a number of detailed issues that could be improved. The proposal creates a good quality open space given context but more could potentially be done to deter the potential for anti-social behaviour caused by the presence of blank walls on the ground floor facing public space. If an inactive frontage is unavoidable special care must be taken with the proposed materials, as some are more vulnerable than others.

The architecture is somewhat systematic but includes sufficient variety as a result of the use of balconies to provide a suitable townscape. More work is urged to demonstrate that the

proposal would be attractive to look at, as required by policies 4B.1 and 4B.9 of the London Plan”.

- 8.34 The proposal has been assessed by the Council’s conservation and design team who note that the design proposal has been negotiated after number of revisions and the current proposal will provide a high quality scheme, where it is appropriately conditioned. The existing new buildings in the area, irrespective of building style, are of a high quality design. To ensure the design quality of this group skyline is not affected, Council’s Urban Design officer has recommend a number of details to be conditioned and assessed prior to construction on site:
- 8.35 To this end, the proposal takes into account and respects the local character and setting of the development site, through:
- the provision of a scale and form of development that it appropriate for this area;
 - the buildings adjacent to the locally listed cottages have been amended to minimise potential impacts from overlooking, bulk and scale;
 - a strong building form within the streetscape that provides definition to the block upon which it is located;
 - provision of good quality open space;
 - conditions requiring details of building materials and external finishes; and
 - the provision of flexible employment space and retail frontage to create bustle and activity.
- 8.36 In consideration of the above, height, design, bulk and scale of the development is considered appropriate subject to appropriate planning conditions.

Access and Inclusive Design

- 8.37 Policy HSG8 of the UDP requires the Council to negotiate some provision of dwellings to wheelchair standards and a substantial provision of dwellings to mobility standards. LDF Policy HSG9 of the emerging LDF requires all new residential development to meet the Lifetime Homes Standard and that 10% of the proposed new housing is design to wheelchair/ mobility standards.
- 8.38 Paragraph 4.12 of the applicants planning report states that *“total of 13 units are adaptable for wheelchair users, which equates to 10% of the scheme. All units are designed to ‘Lifetime Homes’ standard and the scheme has been assessed to an Eco-Homes rating of ‘Excellent.’* An appropriate condition is recommended to ensure the abovementioned is implemented, should planning consent be granted.

Density

- 8.39 The site has a net residential area of approximately 0.3 hectares. The proposed residential accommodation would result in a density of 410 habitable rooms or 1367 habitable rooms per hectare.
- 8.40 Both the London Plan 2004 and the Council’s emerging LDF involve the implementation of a density, location and parking matrix that links density to public transport availability that is defined by PTAL scores. The site has a high level of accessibility – PTAL 4 on a scale of 1-6. For ‘urban’ sites’ with a PTAL range between 4 to 6 within 10 minutes walking distance of a town centre, appropriate density for residential developments of flats with low parking provision should be within the range 450 – 700 habitable rooms to the hectare (hrph).
- 8.41 In general terms, the scheme would appear to be an overdevelopment of the site. However, recent high density developments to the east of the site would suggest that higher densities may be considered in this area. The key issue, in this case, is whether the scheme is

appropriate within the local context and meets the Council's policies for the environment.

- 8.42 Policy HSG9 of the Adopted UDP sets out a number of circumstances where higher densities may be acceptable, particularly, where the development will provide affordable housing and where it is located within easy access to public transport, open space and other local facilities.
- 8.43 Emerging LDF Policy CP20 seeks to maximise residential densities on individual sites; taking into consideration: the local context; site accessibility; housing mix and type; achieving high quality, well designed homes; maximising resource efficiency; minimising adverse environmental impacts; the capacity of social and physical infrastructure and open spaces; and to ensure the most efficient use of land within the Borough.
- 8.44 Policy 4B.3 of the London Plan seeks to ensure that development proposals achieve the highest possible intensity of use compatible with local context, the design principles in Policy 4B.1 and with public transport capacity. The GLA has assessed the scheme in terms of density and determined that:
- 8.45 *"In this instance the density falls above the matrix guidance within the London Plan. Whilst this is the case the scheme will deliver a significant proportion of affordable housing of a good design in a location close to Blackwall Docklands Light Rail station and Canary Wharf town centre".*
- 8.46 It is pertinent to note that the previous application (which was withdrawn) proposed a higher level of unit delivery than now proposed. The applicant has, however, responded to concerns raised by Council regarding overdevelopment of the site. The density originally proposed exceeded 1,800 habitable rooms per hectare. The current application seeks to bring this to a more appropriate level at just over 1,300 habitable rooms per hectare. The GLA state that this reduction is a *"considered approach by the applicant, which remains consistent with housing policy objectives and has helped to deliver a greater provision of open space"*.
- 8.47 In consideration of the above, the density of the development is considered to be appropriate subject to the delivery of sufficient services infrastructure and social infrastructure.

Amenity

Privacy

- 8.48 The development has been designed to overcome any potential adverse impact on the amenities of neighbouring properties. The blocks are arranged to respect minimum privacy distances between facing windows and to ensure there is satisfactory outlook by minimising over-dominance. The minimum boundaries where neighbouring habitable rooms are present is approximately 16.5m to 30m in line with DEV2 of the UDP.
- 8.49 The St. Lawrence Street cottages are within 18m of the development, however, they do not have windows in the facing elevation. The windows in the proposed elevation facing the Cottages have been designed in such a way as to minimise direct overlooking into private amenity space on ground level.

Daylight /Sunlight Access

- 8.50 Daylight is normally calculated by two methods - the vertical sky component (VSC) and the average daylight factor (ADF). The latter is considered to be a more detailed and accurate method, since it considers not only the amount of sky visibility on the vertical face of a particular window, but also window and room sizes, plus the rooms use.

- 8.51 The change in sky visibility or VSC method only provides an indication as to whether there will be changes in lighting levels. It does not necessarily reveal whether the predicted quantity and quality of light is adequate, following the construction of a new development. However, the ADF method provides a means for making such an analysis.
- 8.52 Sunlight is assessed through the calculation of what is known as the annual probable sunlight hours (APSH). This method of assessment considers the amount of sun available in the summer and winter, for each window within 90 degrees of due south or, in other words, windows that receive sunlight.
- 8.53 The Council's Environmental Health officer has assessed the scheme and advised that they are satisfied that the impact of the proposed scheme on to itself and the surrounding existing buildings is acceptable. The shadow analysis and the APSH assessment are also acceptable for planning permission.

Sense of Enclosure/ Outlook

- 8.54 Unlike, sunlight and daylight assessments, this impact cannot be readily assessed in terms of a percentage or measurable loss of quality of light. Rather, it is about how an individual feels about a space. It is consequently far more difficult to quantify and far more subjective. Nevertheless, in the opinion of officers, this proposal does not create an unacceptable increase in the sense of enclosure or loss of outlook to habitable rooms, particularly because of its high density cluster location. In these circumstances, a reason for refusal based on these grounds is not sustainable.

Wind/ Microclimate

- 8.55 The Council's Environmental Health officer has assessed the scheme and advised that the micro-climate study is acceptable. The winds speeds at pedestrian areas used for strolling or recreation do not exceed the pedestrian comfort criteria subject to the following remedial measures being implemented.
- 8.56 Use of historical wind data has shown that wind speeds exceeding 5m/s at pedestrian level occur less frequently than the benchmark used by the Lawson Criteria. If suitable trees/shrubs are used, the proposed garden areas on the west side of Alberta House development will help mitigate against the prevailing south westerly winds at pedestrian level.

Noise

- 8.57 Planning Policy Guidance 24 (PPG24) sets out Noise Exposure Categories (NECs) ranging from A to D, to assist local planning authorities in their consideration of applications for residential development near transport-related noise resources.
- 8.58 The applicant's comparisons of the results of the noise measurements with the NECs in PPG24 indicate that the Alberta House site falls within NEC B during both daytime and night-time. The Council's Environmental Health officer has advised that this is acceptable; however Environmental Health will still require the glazing specification to be provided to internal standards of BS8233.
- 8.59 Should planning permission be granted, consideration should be given to including design measures within the proposed development to provide adequate ventilation and control of summertime temperatures when windows are closed.

Housing

Affordable Housing

- 8.60 According to London Plan policy 3A.12, loss of housing and affordable housing, requires that estate regeneration and redevelopment schemes should be undertaken on the basis that there is no net loss of housing provision and no net loss of affordable housing provision. Paragraph 20.3 of the Mayor's housing SPG states that *"to achieve 100% replacement of demolished social rented units, development at significantly increased density may be necessary to generate sufficient value from market development to support replacement of affordable housing provision or to achieve a mixed and balanced community objective."* The GLA observed that:
- 8.61 *"In such cases, the net gain in total provision need not achieve the usual proportion of affordable housing provision expected from a new build (i.e. the Mayors 50% target). This policy was designed to be tested against large-scale estate regeneration and in this case it is not unreasonable to expect affordable housing over and above that which exists on site at present"*.
- 8.62 Against London Plan Policy 3A.7, the affordable housing target is set that 50% of residential units be secured for affordable housing.
- 8.63 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%.
- 8.64 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 (based on habitable rooms according to HSG10).
- 8.65 The proposal provides 67 affordable housing units, which equates to the following:
- 54% on habitable room basis
 - 50% on unit basis
- 8.66 The proposal therefore meets the strategic target for overall affordable provision given that 50% (54% by habitable rooms) of the overall development will be for affordable housing.

Social Rented/ Intermediate Ratio

- 8.67 Against London Plan policy 3A.7 affordable housing target of 50%, 70% should be social rent and 30% should be intermediate rent.
- 8.68 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.
- 8.69 The social/intermediate split within the affordable component is set at 66/34 in terms of habitable rooms. By considering the overall housing delivery in habitable rooms the following numbers and percentages would be generated:

Tenure	Units	Habitable Rooms	London Plan
social rent	42 (31%)	145 (35%)	35%
shared ownership	25 (19%)	76 (19%)	15%
market	66 (50%)	189 (46%)	50%
total	133 (100%)	410 (100%)	100%

8.70 On consideration of the Mayors Housing SPG, the GLA advised that, “*whilst technically this case is estate renewal, the proposal remains consistent with the strategic targets of 50% affordable and 35% social rent across the whole of the development with no net loss in affordable or housing provision*”.

8.71 The Council’s Housing Department also commented by saying that “*the proposed split is more in line with the mayor of London’s optimum split of 70/30. The high level of affordable housing compensates for the slightly skewed mix*”.

8.72 On balance of the policy objectives and comments made above, the social rented/intermediate housing ratio is considered to be acceptable.

Housing Mix

8.73 The scheme provides a total of 133 residential units. The table below summarises the overall mix of units by type:

Units	Total	% of Total
1 Bed	42	31.6%
2 Bed	49	36.9%
3 Bed	34	25.6%
4 Bed	5	3.6%
5 Bed	3	2.3%
TOTAL	133	100

8.74 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.

8.75 The table below summarises the proposed housing mix against HSG2 of the emerging LDF:

Unit size	Total units in scheme	affordable housing						market housing		
		social rented			intermediate			private sale		
		units	%	target %	units	%	target %	units	%	target %
1 bed	42	8	19	20	9	36	37.5	25	38	37.5
2 bed	49	15	36	35	9	36	37.5	25	38	37.5
3 bed	34	13	30	30	5	28	25	16	24	25
4 bed	5	4	10	10	1			0		
5 Bed	3	2	5	5	1			0		
TOTAL	133	42	100	100	25	100	100	66	100	100

8.76 The GLA have made the following comment in response:

“The mix guidance set out in the Mayor’s Housing SPG, based on the GLA’s housing requirements study, requires an even distribution of units overall between 1, 2 and 3, and 4 bed accommodation. The proposal provides a good provision of larger family 3, 4 and 5 bed units. Whilst this is the case the overall mix is still heavily skewed to 1 and 2 beds. The applicant should substantiate this overall approach across the development”.

8.77 According to paragraph 11.3 of the Mayor’s Housing SPG, the GLA housing requirements study is estimated on the London-wide net housing requirement over the next 15 years, which is shown below:

Overall housing mix	% of Units
1 bedroom household	32%
2/3 bedroom household	38%
4 bedroom or larger household	30%

8.78 Paragraph 11.4 goes on to say that *“these proportions set a regional background to local housing needs requirement and housing market studies. However, paragraph 11.5 states that “local housing needs requirements should not be the single determinant of housing mix sought on individual developments. Sub regional nomination arrangements place an expectation on boroughs to have regard to housing needs beyond their own boundaries. Boroughs should consider the development of housing types, which meet wider housing needs”.*

8.79 In response, the explanatory note to Policy HSG2 of the LDF, paragraph 12.8, considers the trend of over-supply of smaller dwellings reflected in the East London sub-region. Paragraph 12.9 goes on to say that there is a significant need to increase the provision of family housing through out the borough. Paragraph 12.11 also notes that the Mayors Housing SPG seeks to greatly increase the proportions of family housing. However, on balance of these supplementary policy directions, paragraph 12.11 concludes that the proposed housing mix in HSG2 is appropriate.

8.80 On review of the above, the proposed housing mix is considered acceptable where it meets the housing mix targets set out in the LDF.

Amenity Space

8.81 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.

SPG Requirement

- 8.82 • 50sqm of private space per family unit
- 50sqm plus an additional 5sqm per 5 non-family units;

Proposal Would Generate:

- 8.83 • 42 family units (42 x 50sq.m) = 2100sqm
- 91 non-family units (91 x 50sq.m) = 4550sqm
- The GLA calculated that the scheme would yield 86 child bed spaces (86 x 3sqm) = 258sqm

- This equates to a total requirement for 2499sqm in accordance with the SPG.

8.84 Following is an assessment against the residential amenity space requirements under policy HSG7 of the emerging LDF Core Strategy document.

Units	Total	Minimum Standard (sq.m)	Required Provision (sq.m)
1 Bed	42	6	252
2 Bed	49	6	294
3 Bed	32	10	320
4 Bed	4	10	40
TOTAL	127		906 sqm
Ground Floor Units			
3 Bed	2	50	100
4 Bed	1	50	50
5 Bed	3	50	150
Total	6		300
Grand Total	133		1206sqm
Communal amenity	50sqm for the first 10 units, plus a further 5sqm for every additional 5 units		173sq.m (50sq.m plus 123sqm).
Total Housing Amenity Space Requirement			1379sqm

8.85 The proposal provides the following housing and communal amenity space:

- 1870sqm private amenity space (including private gardens, terraces and balconies). The applicant has advised that all units have access to private balcony space with an average area between 8 and 18sq.m. Family dwellings at ground level have access to private gardens with an average area of 32 sq.m.
- 2270sq.m of communal space at ground level, including a green roof terrace on Block B and the following child play space:
 - Toddlers Playground @ 100 sq.m
 - Older age group Play Area @ 210 sq.m

8.86 The proposed amenity space is considered acceptable. However, as mentioned above, the implementation of the ground floor landscaped area should be conditioned appropriately to ensure a high quality outcome is achieved.

Open Space

8.87 When considering appropriate residential densities for a site, the provisions of adequate open space; including private, communal and public open space is a key consideration. HSG1 Policy OS2 of the UDP and CP30 of the LDF seek to improve access to open spaces. Whilst the provision for open space and for the play and informal recreation needs of the children and young people is much improved from the previous scheme, the Councils Parks Department believe that the development will exacerbate the existing open space and play / informal recreation deficiencies of the area.

8.88 The nearest park (Robin Hood Gardens) is a 300-metre walk to the north of the A1261 Aspen Way, but is of poor quality and crossing the Aspen Way is an additional difficulty.

Others exist but at fairly significant distances such as the 750-metre walk to Poplar recreation ground and All Saints Church public gardens. As such, the Parks Department believe that development on this proposed scale cannot meet our planning requirements for open space and the play and informal recreation needs of children and young people of the development.

- 8.89 The GLA identified that this area has come forward with a number of high-density developments none of which have delivered, to date, any meaningful, high quality, open space, that a comprehensive approach is needed to identify and deliver a substantial area of open space between the collective schemes.
- 8.90 Given the identified shortfall of open space, a section 106 contribution has been sought to mitigate the impacts that could arise from the additional demand this development would place on the existing open space.

Transport

Parking and Access

- 8.91 A total of 5 off-street car parking spaces are provided within the proposed development, including 2 disabled spaces.
- 8.92 In accordance with the Government's advice in PPS3: Housing and PPG13: Transport, the UDP has no minimum parking standards. As such, 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. The GLA supports the low level of parking proposed. Nevertheless, given the limited parking availability in the area, TfL would expect monitoring arrangements and mitigation measures to be put forward and included as part of the travel plan to avoid overspill parking and suppress parking pressure that may arise in future.
- 8.93 Policy DEV48 of the UDP identifies the site as a Strategic Riverside Walkway. The site is not immediately adjacent to the Thames, however in this location the UDP indicates the continuation of the walkway along Blackwall Way. The proposed development will not affect the functioning of this Riverside Walkway connection along Blackwall Way, now largely facilitated by the new walkway provided at New Providence Wharf. This new route is supported by the emerging LDF.

Cycle Parking

- 8.94 TFL welcomes the provision of 133 cycle parking spaces. Wash down facilities has also been provided.
- 8.95 An appropriate condition is recommended to ensure that the provision of cycle spaces and facilities are satisfactory.

Public Transport

- 8.96 The PTAL rating for the site is 4. Blackwell DLR station and bus stops along Preston's Road are within short distance from the site. Aspen Way is approximately 150 metres north of the site and is part of the Transport for London Road Network.
- 8.97 The GLA note that as the high density proposed is above those set out in Table 4B.1 of the London Plan. Contributions for pedestrian infrastructure improvements have been requested

via the S106 agreement to ensure that the development can be accommodated within the transport network.

Servicing

- 8.98 The developer has allowed for a delivery bay to be provided for a transit van adjacent to the local shop provided. The Council's Highways Department considered this to be an acceptable location and still maintains more than adequate pavement widths.
- 8.99 Notwithstanding this, TFL have advised that the bus route 277 is being diverted to serve development in the area, although via Balfin Way rather than Yabsley Street. The developer has removed the loading bay in response to TfL's concerns that it will conflict with traffic.
- 8.100 The service area off Gaselee Street is acceptable for refuse storage collection and for servicing of the site. Refuse collection from other areas in the scheme was considered by the Highways Department to be an acceptable location.

Energy

- 8.101 The London Plan energy policies 4A.7-4A.9 aim to reduce carbon emissions by requiring the incorporation of energy efficient design and technologies, and renewable energy technologies where feasible. Policy DEV6 of the emerging LDF also requires that all new development should incorporate energy efficiency measures.
- 8.102 The applicant has submitted an energy strategy setting out how they intend to reduce likely carbon dioxide emissions. The efficiency measures include high insulation and high performance glazing, low energy lighting and provision of outdoor drying space. The majority of the units are double aspect, allowing good access to natural daylight and ventilation. A brief analysis of combined heat and power has also been provided. This concludes that large scale combined heat and power is not appropriate given there is no year round heating demand to meet the level of heat and electricity that would be generated. The applicant also advises that there are no options to link up with adjacent sites. Despite this the applicant has, however, considered a small-scale 22Kw CHP sized to serve electricity needs for the communal areas and provide additional heat to the community heating network proposed.
- 8.103 The heating will therefore be biomass, with top up gas fired heating. Other renewable options could work, including solar water heating and photovoltaic panels, however the applicant claims these options prove to be less cost effective and do not provide the same level of carbon savings as the biomass option. The savings from the community biomass heating will deliver 23% carbon reduction.
- 8.104 The GLA have advised that it is not clear whether the carbons savings of 23% are set against 2006 building regulations. They advised that the applicant needs to provide detail regarding the source and supply for the biomass. In addition delivery arrangements should be provided and evidence of adequate storage capacity. The applicant sought to address these matters with the GLA by letter dated 23 May 2007, including justification rejecting a district approach to energy, and the option of linking in with New Providence Wharf to the east.
- 8.105 Whilst the GLA still consider that a district combined heat and power (CHP) approach should be utilised, it is clear that the proposed development would meet and exceed the Mayor's current and declared future intentions as to the use of renewable energy in developments in London. The approach taken is considered to comply with the above-mentioned London Plan and emerging LDF policies, the implementation of which should be conditioned appropriately to ensure that the energy strategy is complied with as proposed.

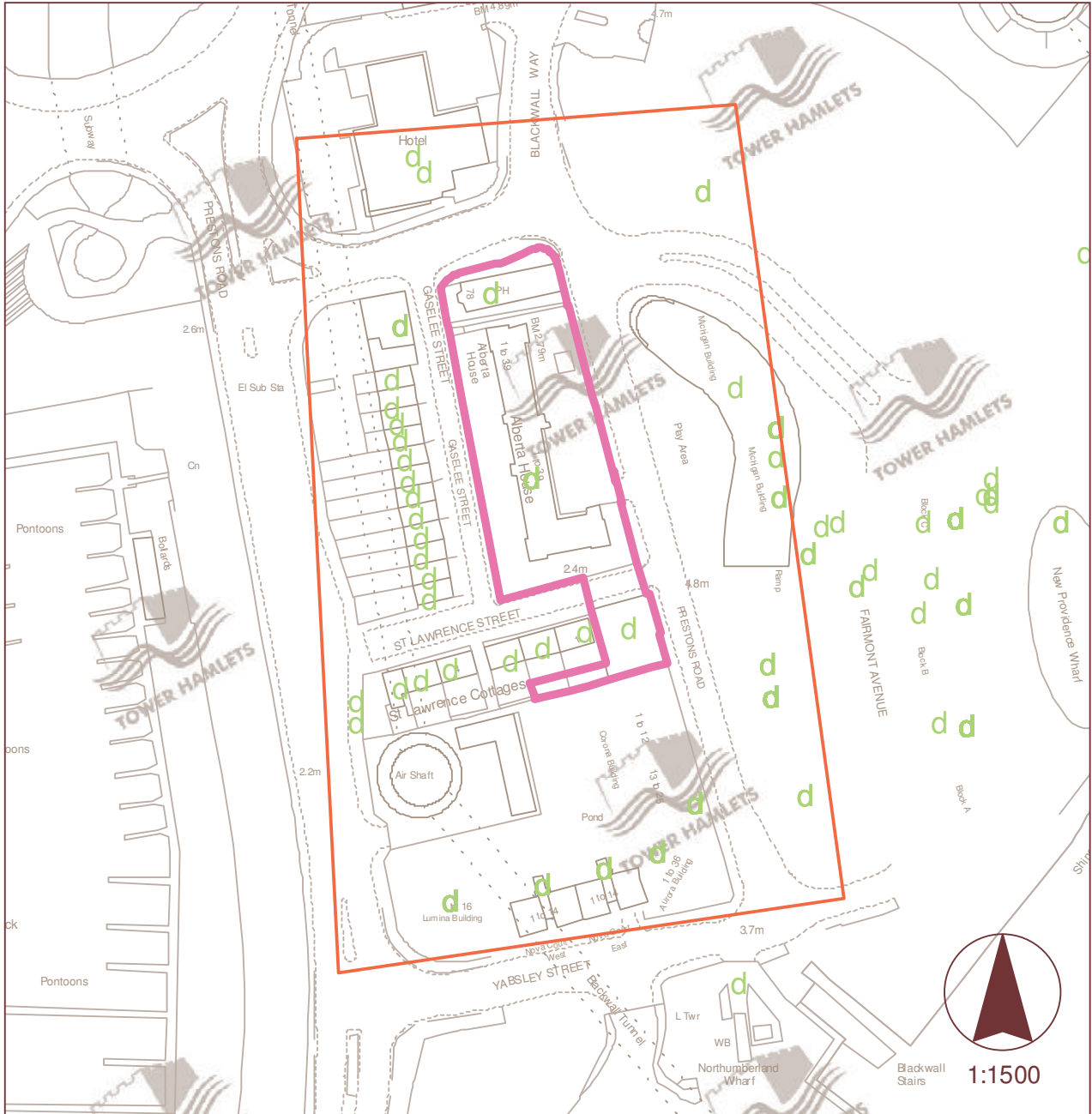
Biodiversity

- 8.106 The applicant provided an ecological assessment for the site. The Council's Ecology Department was satisfied that the Proposed Development poses little risk to local biodiversity.
- 8.107 Notwithstanding, where feasible, habitats and features to enhance the proposed development for utilisation by black redstarts should be incorporated into the design. For example, the installations of black redstart nest boxes and the creation of suitable ledges or nesting holes.

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

This page is intentionally left blank

Agenda Item 8.4

Committee: Strategic Development	Date: 21 st June 2007	Classification: Unrestricted	Agenda Item No: 8.4
Report of: Corporate Director of Development and Renewal		Title: Planning Application for Decision	
Case Officer: Rachel Blackwell		Ref No: PA/07/00298	
		Wards: Bromley by Bow	

1. APPLICATION DETAILS

Location:	2-10 Bow Common Lane, London E14
Existing Use:	Collection of buildings formally used as offices and warehousing.
Proposal:	Redevelopment up to 13 storeys to provide 157 residential units and 2 commercial units comprising 868sq.m of floor space for A1, A2, A3, A4, B1, D1 or D2 use with car parking and landscaping. (Resubmission)
Drawing Nos:	2860 PL/001, 2860 PL/101 Rev C, 2860 PL/102 Rev A, 2860 PL/103 Rev A, 2860 PL/104 Rev A, 2860 PL/105 Rev A, 2860 PL/106 Rev A, 2860 PL/107 Rev A, 2860 PL/108 Rev A, 2860 PL/109 Rev A, 2860 PL/110 Rev A, 2860 PL/111 Rev A, 2860 PL/200 Rev A, 2860 PL/201 Rev A, 2860 PL/202 Rev A, 2860 PL/203 Rev A, 2860 PL/204 Rev A, Planning Statement – S Dunn-Lwin – February 2007 Design & Access Statement – Stock Woolstencroft – February 2007 Traffic Assessment – Paul Mew & Associates – February 2007 Phase 1 Environmental Assessment – WSP - January 2007 Sustainable Energy Strategy – ESD – February 2007 Sustainable Energy strategy – Response to GLA – ESD May 2007 External CFD & Wind Study – XC2 – September 2006 Daylight, Sunlight & Overshadowing Assessment - Nathaniel Lichfield & Partners – March 2007 Letter, Daylight & Sunlight Assessment - Nathaniel Lichfield & Partners – May 2007 Acoustic Report – AIRO – February 2007 Socio Economic Impact Assessment – Environs – February 2007
Applicant:	Ashtontown Ltd C/- Stock Woolstencroft
Owner:	Newspace Developments
Historic Building:	N/A
Conservation Area:	N/A

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:

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		Eileen McGrath 020 7364 5321

- a) In principle the redevelopment of the site to provide 157 units, commercial space with associated landscaping and car parking 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 157 units, commercial space with associated landscaping and car parking would not have an adverse impact upon the amenity of surrounding properties. A number of conditions are recommended to secure submission of details of materials, landscaping, external lighting, sound insulation and to control noise and hours of construction.

RECOMMENDATION

2.2 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:

- a) Affordable Housing provision of 36.7% of the proposed residential units measured by habitable rooms with a 76/24 split between rented/shared ownership in accordance with the mix specified in this committee report.
- b) A contribution of **£500,000** towards healthcare to mitigate the demand of the additional population on healthcare services.
- c) A contribution of **£250,000** towards education to mitigate the demand of additional school places generated by the proposal.
- d) A contribution of **£20,000** towards employment initiatives such as the Local Labour in Construction (LliC) or Skillsmatch in order to maximise the employment of local residents.
- e) A contribution of **£150,000** towards highways, pedestrian & cycle improvements within the surrounding area.
- f) A contribution to TfL of **£20,000** towards the installation of the Docklands Arrival Information System (DAISY).
- 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.
- j) Code of Construction Practice.
- k) TV and Radio Reception.

2.3 That the Head of Development Decisions be delegated power to impose conditions and informative on the planning permission to secure the following:

Conditions

- 1) Permission valid for 3 years;
- 2) Details of the following to be submitted:-
 - (a) the materials, to be used on the external faces of the building including balcony detail and treatments;
 - (b) design of frontage for ground and first floor commercial units;
 - (c) details of all roof level plant equipment;
 - d) Detail of children's play areas.
- 3) Submission of a Secured by Design Statement and implement recommendations;

- 4) Submission of a Landscaping scheme and landscape management plan, to be considered in consultation with British Waterways and the Environment Agency. Landscaping schemes would include unobstructed access to the Limehouse Cut for riverside maintenance.
- 5) All planting, seeding or turfing to be carried out in the first planting and seeding seasons;
- 6) Submission of full details of the proposed lighting and CCTV scheme, to be considered in consultation with British Waterways;
- 7) Submission of details of all necessary fume/ventilation for the Class A1, A2, A3, A4, B1, D1 or D2 use;
- 8) Any fume/ventilation and air conditioning equipment shall only operate between the hours of 8.00am and 10.00pm;
- 9) The Class A1, A2, A3, A4, B1, D1 or D2 use to operate only between the hours of 8.00am to 10.00pm on any day;
- 10) No music, PA system or other amplified sound to be played within the Class A1, A2, A3, A4, B1, D1 or D2 use so as to be audible from nearest residential premises;
- 11) Submission of details of sound insulation measures for the Class A1, A2, A3, A4, B1, D1 or D2 use premises;
- 12) Implementation of mitigation against external noise and the recommendations continued within Table 3 of the noise assessment submitted;
- 13) No doors or gates shall be hung so as to open over or across any pedestrian or public footpath;
- 14) Provision of a minimum of 157 cycle spaces;
- 15) Provision of a maximum of 30 car parking spaces and 3 disabled spaces;
- 16) Parking, access and loading/unloading, manoeuvring;
- 17) Submission of details of refuse and recycling facilities;
- 18) Submission of details of surface source water drainage works/control measures;
- 19) No soakaways shall be constructed in contaminated ground;
- 20) Submission of details of site foundations;
- 21) Submission of an Investigation and remediation measures for land contamination;
- 22) Submission of an air quality assessment;
- 23) Submission of construction management plan including a traffic management plan detailing all routes to be used by construction vehicles and maintenance programmes to be considered in consultation with TfL;
- 24) 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.)
- 25) Power/hammer driven piling/breaking (10am – 4pm Monday – Friday);
- 26) Lifetime Homes / 10% Disabled Access;
- 27) Renewable Energy Measures (at least 10% reduction in carbon dioxide emissions);
- 28) Submission of a waterways wall survey, including a method statement and schedule of repairs identified.
- 29) Prior to the commencement of development a canal wall survey must be submitted and considered in consultation with the environment Agency. The survey would detail the stability and structural integrity of the wall and the ability to accommodate climate change.
- 30)
- 31) Any other condition(s) considered necessary by the Head of Development Decisions.

Informatives

- 1) Section 106 of the Town and Country Planning Act 1990.
- 2) Locally native plant species only, of UK genetic origin.
- 3) Adequate sewerage infrastructure in place
- 4) With regard to (Decontamination), contact Council's Environmental Health Department.
- 5) With regard to the Code of Construction Practice, discuss this with Council's Environmental Health Department.
- 6) With regard to the Air Quality Assessment, discuss this with Council's Environmental Health Department.
- 7) Consult with the Councils Highways Development Department regarding any

alterations to the public highway.

- 8) Consult British Waterways on canal edge details, including landscaping and ecological enhancements.
- 9) Consult British Waterways on opportunities to explore the opportunity to remove construction waste, deliver construction materials and to remove household waste and recycles from the site by water.
- 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.

2.4 That if by the 21st 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.

3. PROPOSAL AND LOCATION DETAILS

Proposal

- 3.1 An application has been submitted for the development of the site to demolish the existing buildings on the site and erection of a 12 storey residential led development with commercial floor space at ground level (including A1, A2, A3, A4, B1, D1 or D2 uses). The development is proposed to incorporate 157 residential units with associated car parking and landscaping.
- 3.2 The buildings would comprise two separate parallel blocks in a north-south alignment separated by a central courtyard. Block A-B would comprise a mixed use block fronting Bow Common Lane, rising from 5 storeys to the north of the site to a multi storey form rising up to 13 storeys in height adjacent to the Limehouse Cut (canal). Block C-D would be located to the east of the site rising from 4 storeys in the north to 6 storeys in the south adjacent to the Limehouse Cut. Block C-D drops down to 2 storeys in form adjacent to residential development to the east at Invicta Close.
- 3.3 Of the 157 units proposed a total of 52 units would be affordable and 105 for private/market sale. This would equate to 36.7% affordable housing provision calculated on a habitable room basis. In total, there would be 10 studio flats, 57 one bedroom units, 48 two bedroom units, 36 three bedroom units, 4 four bedroom and 2 five bedroom units.
- 3.4 The development proposes 868m² of ground and first floor commercial space (including potential A1, A2, A3, A4, B1, D1 or D2 uses) provided at ground and first floor level of blocks A/B at the Bow Common Lane frontage.
- 3.5 The proposal includes a canal side walkway, communal landscaped areas, private gardens, and balconies to upper floor units.
- 3.6 A basement car park with access from Bow Common Lane provides 30 car parking spaces, including 3 disabled spaces. 176 cycle spaces would be provided within designated storage spaces throughout the site.

Site and Surroundings

- 3.7 The application site comprises land at 2-10 Bow Common Lane, Bow. The site has an overall area of 0.46ha and is bounded by Bow Common Lane to the west, and the Limehouse Cut to the south. The site contains access from both Bow Common Lane and Hawgood Street to the rear of the site.

- 3.8 The site contains a collection of buildings that have been developed over time. The current buildings at 6-10 Bow Common Lane comprise 2 storey form with access to the rear from Hawgood Street. A 3-4 storey office building is presently located at 2-4 Bow Common Lane fronting to the Limehouse Cut. The applicant advises that the buildings on the site are currently vacant.
- 3.9 Located directly opposite the site to the west of Bow Common Lane, between Thomas Road and the Limehouse Cut are commercial and industrial premises. A mixed use development was recently recommended for approval by the Strategic Development Committee on land at 48-52 Thomas Road, directly opposite (west) of the subject site (PA/06/01992) Also to the west, is the Burdett Estate containing residential development, comprising blocks of flats rising to 3 storeys in form.
- 3.10 To the north of the site is 12 and 14 Bow Common Lane containing buildings of 2-3 storey form. No 14 was previously used as a public house.
- 3.11 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 commercial/industrial development and Cottal Street and Bartlett Park to the south west, which currently contains a block of flats.
- 3.12 To the east of the site is Invicta Close which contains residential development fronting the Limehouse Cut.
- 3.13 The site has a public transport accessibility level of 3 (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 10-20 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). Bus services also operate from St Pauls Way and Burdett Road.

Planning History

- 3.14 The following planning decisions are relevant to the application:

PA/06/01897 An application was made for redevelopment up to 15 storeys and basement to provide commercial units (B1 and A3) on ground floor with 176 residential units, basement car parking and landscaping. This application was withdrawn by the applicant on the 11th January 2007.

Officers have negotiated with the applicant to achieve the current scheme which is considered in this report.

4. POLICY FRAMEWORK

- 4.1 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:		Green Chain
		Lea Valley Regional Park
Policies:	DEV1	Design Requirements
	DEV2	Environmental Requirements
	DEV3	Mixed Use Developments
	DEV4	Planning Obligations

DEV6	High Buildings Outside the Central Area & Business Core
DEV12	Provision of Landscaping in Development
DEV13	Design of Landscape Scheme
DEV46	Protection of Waterway Corridors
DEV48	Strategic Riverside Walkways and New Development
DEV50	Noise
DEV51	Soil Tests
DEV55	Development & Waste Disposal
DEV56	Waste Recycling
DEV69	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 (Central Area Action Plan)
	CP34	Green Chain
	CP35	Lea Valley Regional Park
	CP36	Blue Ribbon Network

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
- Canal side 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

5. CONSULTATION RESPONSE

5.1 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

5.2 Affordable Housing

Policy CP22 of the emerging Local Development Framework governs the amount of affordable housing expected. For schemes providing more than 10 units there is a minimum requirement of 35% affordable housing.

Policy HSG10 of the emerging Local Development Framework specifies that the affordable housing should be calculated by using habitable rooms as a primary measure unless there is greater than 5% disparity between the provisions calculated by habitable rooms and by floor space, when the measure providing the most affordable housing should be used. The proposed affordable housing provision exceeds the policy requirement for 35% affordable housing

Policy CP21 'Dwelling Mix and Type' of the emerging Local Development Framework governs the ratio of social rented units to those of intermediate tenures. The expectation is that the ratio will be 80% / 20% Measured by unit the ratio of rent to intermediate dwellings

is 70/30 measured by habitable rooms it is 76% /24%

Analysis of Unit Mix

Policy HSG2 'Housing Mix' of the emerging Local Development Framework specifies an expected unit mix. Para 5.14 states that a range of dwellings with differing layouts should be provided to widen housing choice.

On balance the scheme provides a good match with the Council's preferred unit mix for affordable housing (social rented and intermediate) housing specified in the Local Development Framework. The scheme provides 43% family units (3 bedrooms or larger) within the affordable rented housing, against the Council's target of 45%. There is however, an under provision of three bed units within the intermediate mix. The total % of three bed units in the intermediate mix is 18% against the target of 25%. On balance this is considered acceptable given the higher than average family provision overall.

Detailed Design

The Council expects that affordable housing be integrated with the rest of the development and have the same external appearance.

The affordable rented housing is located between block C and D of the scheme. Block C contains both private and shared ownership units, whilst Block D contains 39 rented units.

Policy HSG7 'Housing Amenity Space' of the emerging Local Development Framework specifies minimum standards for private amenity space, and further that sites proposing 10 or more residential units require functional and useable communal amenity space.

All upper floor units have access to a private balcony. All ground floor family units have access to a garden. There is a combination of hard and soft landscaping.

Accessibility

SPG and the emerging Local Development Framework Policy HSG9 both require 10% wheelchair accessible accommodation; further the Local Development Framework requires that all new homes be built to lifetime homes standards. The scheme provides three affordable wheelchair units and 10 private units designed to be adaptable for wheelchair use. The wheelchair provision equates to 8% of the scheme. The council's requirement is 10%

(OFFICER COMMENT: The under provision of wheelchair adaptable housing is also raised by the GLA. It issue can be addressed through relevant conditions of approval requiring the developer to provide at least 10% wheelchair adaptable housing).

LBTH Education Development

- 5.3 The scheme generates a need for a developer contribution towards the provision of 21 additional primary school places @ £12,342 = £259,182.

There is a shortage of primary school places in this area and developer contributions would be pooled in order to create the additional capacity required as a result of the cumulative impact of developments.

- 5.4 **LBTH Corporate Access Officer**
No comment received.

5.5 **LBTH Energy Efficiency Unit**

No comment received.

5.6 **LBTH Highways Development**

The redesign of this application has resulted in an improved development with few highway implications. The reduction in car parking, the servicing arrangements and car free status have gone a long way to making this application acceptable.

There is still concern over the canyon effect of the development and the lack of permeability through the site from Bow Common Lane to Hawgood Street. This would be mitigated by improvements detailed in the Section 106 contributions.

With this in mind this application is now considered acceptable from a highways view.

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, Furze Street and Hawgood Street resurfacing will be required. 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 developments 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 in line with the contribution secured from the development opposite known as 48-52 Thomas Road application number PA/06/1992.

5.7 **LBTH Environmental Health**

Air Quality

The development is large and consists mostly of residential sections which are placed within an air quality management area. This implies exposure of persons to high levels of air pollution. Thus an air quality assessment must be submitted.

(OFFICER COMMENT: The submission of an air quality assessment would be required as a condition of approval.)

Noise

Environmental Health is satisfied with the recommendations of the report with regard to mitigation against external noise. This is subject to the developer ensuring the recommendations in table 3 of the report are implemented.

Adequate insulation to be provided between commercial on the ground floor and residential on the first floor.

Details of any proposed ventilation/extract duct must be submitted and approved by Environmental Health.

(OFFICER COMMENT: The above details in relation to noise would be required as a condition of approval)

Contaminated Land

The site and surrounding area have been subjected to former industrial uses, which have the potential to contaminate the area. Ground works and soft landscaping are proposed and

therefore a potential pathway for contaminants may exist and will need further characterisation to determine the associated risks.

The application should be conditioned to ensure the developer carries out a site investigation to investigate and identify potential contamination.

(OFFICER COMMENT: The above details in relation to land contamination would be required as a condition of approval)

5.8 LBTH Cleansing Officer

No comment received.

5.9 LBTH Horticulture & Recreation

No comment received.

5.10 London City Airport

No safeguarding objection.

5.11 Tower Hamlets PCT

A contribution for health services of approximately £776,196 is required. This will seek to mitigate the density of the development upon health services in the surrounding area.

5.12 British Waterways

No objection subject to amended plans, a legal agreement and conditions to address the following comments:

Waterway Wall works

Request that the applicant carries out a waterways wall survey and produced a method statement and schedule of the repairs identified to be carried out before work starts on site.

Landscaping/ Ecology

Request that BW are consulted on, or contacted directly to discuss the canal edge details.

Waterborne Transport

In the interest of sustainable development BW would also like to see the use of the canal for waterborne transport.

S106

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 the proposed development presents an opportunity for funding local canal side environmental improvements including improvements to Bow Common Bridge, towpath upgrade works, and access improvements to the towpath.

(OFFICER COMMENT: The above requirements of British Waterways should be secured through relevant conditions, section 106 and informatives of planning permission.)

5.13 Environment Agency

Objects to the application on the following grounds:

- Sufficient access to the canal side for river wall maintenance improvements or renewal has not been provided in the proposed layout of the development.
- A report on the condition of the canal wall has not been submitted.

(OFFICER COMMENT: The applicant has demonstrated that river wall maintenance is possible in the proposed scheme and has provided a commitment to submitting a report on the condition of the canal wall prior to the commencement of the development. Officers

consider that the above issues can be appropriately conditioned. The information submitted would be considered in consultation with the Environment Agency.)

5.14 Lea Valley Regional Park Authority

No comment received.

5.15 Greater London Authority

The principle of residential led, mixed use development on the site has previously been supported by the Mayor. In this case further clarification is required into aspects of the financial viability appraisal. In addition the report outlines additional responses required from the applicant regarding transport, energy, the design (including the link through the site to Furze Green), and regarding access to communal roof areas. These matters should be addressed before the application is referred back to the Mayor for a final decision.

(OFFICER COMMENT: The applicant has provided a response in relation to the above issues raised by the GLA. These issues will be further discussed in the planning considerations section of this report.)

6. LOCAL REPRESENTATION

6.1 A total of 198 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:	3	Objecting:	2	Supporting:	0
No of petitions received:	0				
Other:	1				

6.2 The following issues were raised in representation that are material to the determination of the application, and they are addressed in the next section of this report:

Objecting:

The scale of the proposed development is inappropriate to the area, especially in the light of the recent loss of open space in Furze Green.

A 13 (sic) storey building would be likely to generate a poor microclimate in the Bow Common Lane/Devons Road/St Paul's Way area, interacting with, for example Elmslie Point (Burdett Road) and Lewey House (Bow Common Lane) amongst others. This could have an adverse effect on what open space remains in the area in terms of high winds, litter, etc.

To propose to bring 127 (sic) new dwellings into an area recently deprived of what little open space remained shows no respect for existing residents.

Should planning consent be granted number of storeys permitted should be no greater than the non-tower block average on adjacent estates (i.e., Burdett, Glauca & Perring, Leopold, and Lincoln.)

Adjoining neighbour concerned about the location of the rubbish store and the demolition of the wall adjacent to 12 Bow Common Lane.

(OFFICER COMMENT: appropriate conditions are included with regard to the bin store and the demolition of the wall is not a planning matter)

Other

Leaside Regeneration Limited requests that the Planning Authority give consideration to requesting that the developer makes a financial contribution under Section 106 of the Town and Country Planning Act 1990 to the proposed enhancement of the adjacent Bartlett Park.

A masterplan for improvements to Bartlett Park has been prepared and is fully supported by the Borough and the local community. The realisation of these improvements remains a priority and contributions from this development, as well as other anticipated developments in the local area over the next 5 years, would help to secure them. In turn, the park will help these individual developments achieve their open space planning requirements.

(OFFICER COMMENT: Council's Environment and Culture Department were consulted on the application. A request has not been made to allocate any Section 106 contributions to existing open space areas such as Bartlett Park or Furze Green.)

7. MATERIAL PLANNING CONSIDERATIONS

7.1 The main planning issues raised by the application that the Committee must consider are:

1. Land Use;
2. Density;
3. Design and Layout & the Suitability of a Tall Building at this Location;
4. Accessibility & Inclusive Design – Safety & Security;
5. Affordable Housing, Dwelling Mix & Housing Standards;
6. The Blue Ribbon Network;
7. Energy Efficiency;
8. Transport & Parking;
9. Associated Amenity Impacts to Surrounding Properties.

Land Use

7.2 The subject site is unallocated on the UDP proposals map (1998). The site was however previously used for industrial land use and surrounding sites are nominated as an employment location in the UDP proposals map (1998). It is apparent that land use within the area is presently evolving and the site and surrounds has been designated in the Local Development Framework as a suitable location for mixed use development. In essence the proposed development comprising both residential and including potential A1, A2, A3, A4, B1, D1 or D2 uses is consistent with the emerging Local Development Framework, thereby reflecting the evolution of land use within the area.

7.3 The site presently contains a number of warehouse buildings with a total floor space of 4595 m² which are presently vacant. The scheme proposes 868m² of commercial floor space at ground and first floor 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.

7.4 Given that the site is presently vacant other than potential residential activity, employment generation is minimal or non existent. The proposal provides for 868m² of commercial floor space, which will provide for modern premises which will seek to meet the needs of modern day businesses. The floor space is flexible and therefore could be used as the one unit or subdivided into a number of units, suitable for the variety of uses envisaged via the application, including retail, financial and professional service, food and drink premises, office or community use.

7.5 It is calculated that the proposed commercial premises would provide for 54 jobs. This would

therefore result in an intensification of employment use on the site.

- 7.6 Although less than the existing employment floor space on site, the mix of uses and the likely employment will be far greater, given the improvement in the layout and quality of the commercial space provided.
- 7.7 In line with policy EMP 1 and 2 of the Unitary Development Plan, the proposal therefore provides good quality replacement buildings likely to generate an appropriate density of jobs for this location and is thus supported.

Residential Density

- 7.8 Policy HSG9 of the UDP provides an upper figure of 247 habitable rooms per hectare (HRH) for new residential development. The policy sets out four circumstances where higher densities may be acceptable, these include:

- 1. The development would be for special needs housing or non-family housing*
- 2. The development is located within easy access to public transport, open space and other local facilities*
- 3. The dwellings are part of a substantial mixed use development or are a small in fill*
- 4. It can be demonstrated that the development meets all other standards for new dwellings in the Plan and does not conflict with the Council's policies for the environment.*

- 7.9 UDP policy HSG9 has largely been superseded by the density policies of the London Plan 2004 and Policies of the Local Development Framework. 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 Local Development Framework 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).

- 7.10 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 range is 200-450 hrh. The proposed density of 966hrh 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

Design & Layout and Suitability of a Tall Building at this Location

- 7.11 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.
- 7.12 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, 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.
- 7.13 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.

Site layout

- 7.14 The surrounding urban form is presently industrial in nature with residential development to the east (Invicta Close) and to the west (recently approved 48-52 Thomas Road). 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 and the recently approved 5-12 storey residential development to the west at the corner of Thomas Road (No 48-52 PA/06/01992) and Bow Common Lane.
- 7.15 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 sites prominent junction at a bridge crossing over the Limehouse Cut.
- 7.16 Blocks A and B are designed to align with the Bow Common Lane frontage. 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 and to address Environment Agency setback requirement for maintenance access.
- 7.17 Block A/B comprises a 5-6 storey form to the north of the site adjacent to existing properties to the north and rises up to the 12 storey tower element adjacent to the Limehouse Cut.
- 7.18 The building contains ground and first floor commercial space with residential development provided above. Block A contains the car parking and service access direct from Bow Common Lane via the existing vehicle crossover.
- 7.19 Block C/D is located to the east of the site and has a direct relationship with the canal and the central area of open space.
- 7.20 Blocks C/D comprise a 2-6 storey form. 2 storey form is located adjacent to existing residential development at Invicta Close to the east of the site. The built form rises up to the west to form a 6 storey building.
- 7.21 Both blocks C/D contain larger family units. A number of family units contain ground level open space areas, ranging in area from 20-73m² in area. All units within the scheme are also afforded access to the central open space (accommodating child play space), and canal side walkways.
- 7.22 The setback between blocks A/B and C/D is utilised as an open space area forming the core of the development and providing access from the scheme to the canal edge. The central amenity space has been designed to be car free with access for emergency and maintenance vehicles only.

- 7.23 The open space area has been divided into two levels, comprising a lower level open to the public and an upper level which forms a podium deck over the parking and servicing area which is private and secure. Play space will be provided on both levels of open space.
- 7.24 The open space and canal side walkways would be landscaped in accordance with the landscape plan details, which would be agreed as a condition of approval.
- 7.25 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 and Furze Green. 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

- 7.26 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/B on Bow Common Lane has a varied building height and is well articulated, including variation in materials, fenestration and balcony treatments which seek to provide a visually interesting built form which results in a high quality scheme and an improved relationship with Bow Common Lane, whilst also seeking to maintain the characteristics of surrounding development.
- 7.27 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 tall element is continued through to ground level and steps down to 6, 5, 3 and 2 storeys along the remainder of the canal frontage and at Bow Common Lane, thereby providing a positive relationship to both of these frontages.
- 7.28 The design of the tower element is viewed as one piece which is anchored to the ground with columns. This feature will seek to provide a more human scale to development to both Bow Common Lane and the canal at street level. Materials would include solid white render which will seek to frame the proportions of glazing. The southern elevations would be principally glazed with full width balconies to take advantage of views and orientation. 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

- 7.29 The scheme provides a total of 3595m² of hard and soft landscape and private space, including private gardens to a number of family units at ground level. A majority of residential units within the development would have direct access to private amenity space in the form of ground level open space and private balconies.
- 7.30 The development also incorporates communal open space in terms of landscaped gardens, totalling 1673m². This open space would incorporate children's play space including play provision for toddlers within the two equipped play areas.
- 7.31 The applicant considers that given the provision of open space on the site roof gardens to each of the proposed blocks would be better utilised as green roofs in order to promote biodiversity and provide enhanced visual amenity to the upper level blocks. This is considered acceptable and can be secured through conditions of approval, given the high proportion of open space provision on the site.
- 7.32 In addition the site is located adjacent 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. Whilst the development is not provided with a direct linkage to the Furze Green open space to the north (cycle and pedestrian route only) it is intended that future occupants could access the Furze Green open space via the riverside walkway through Invicta Close or via Bow Common Lane and open space linkages provided within the Furze Green development proposals to the north.

- 7.33 All residential units within the development achieve or exceed the Council's space standards. The distance between habitable room windows exceeds the council minimum standards.

Accessibility & Inclusive Design – Safety & Security

- 7.34 UDP policies DEV1 and 2 and policy DEV 3 of the Local Development Framework 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.
- 7.35 Further UDP Policies DEV1 and 2 and Policy DEV 4 of the Local Development Framework 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.
- 7.36 The commercial component of the development is oriented to Bow Common Lane and the central courtyard providing for active frontages. The entries to the residential components of the development are provided off the central courtyard areas and the Bow Common Lane frontage and would be visually identifiable and accessible thereby promoting a high standard of amenity for future occupants.
- 7.37 The layout of the site and the through linkages proposed result in good accessibility and inclusive design which would lead to a high quality environment for future occupants.
- 7.38 The developer will be required by a condition of approval to ensure that all units within the development are designed to lifetime homes standards in accordance with Planning Standard 5: Lifetime Homes, including at least 10% of all housing being wheelchair accessible or easily adaptable for residents who are wheelchair users.
- 7.39 Overall it is considered that the proposal represents a design, massing and scale which achieve a positive response to the sites context, including its relationship with the Limehouse Cut, and Bow Common Lane and existing and emerging development in the surrounding area.

Housing

Affordable Housing

- 7.40 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 Borough's own affordable housing targets.
- 7.41 The Local Development Framework Policy CP22 seeks 50% affordable housing provision from all sources across the borough with a minimum of 35% affordable housing provision on site's 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.

7.42 The application provides 52 affordable housing units out of the total 157 units proposed, representing 36.7% provision overall (35% in terms of units and 37% in terms of the total habitable rooms). This scheme meets the Council's minimum target of 35%.

Dwelling Mix

7.43 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.

7.44 Local Development Framework Policy HSG2 specifies the appropriate mix of units to reflect local need and provide for 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.

7.45 The affordable housing for social rent would comprise the following dwelling mix:

Affordable Rented	Studio	1 bed	2 bed	3 bed	4 bed	5 bed	Total
Units	-	12	9	12	4	2	39 (24.8%)

7.46 The intermediate housing would comprise the following dwelling mix:

Intermediate	Studio	1 bed	2 bed	3 bed	4 bed	5 bed	Total
Units	-	8	4	1	-	-	13 (8.28%)

7.47 The market housing would comprise the following dwelling mix:

Market	Studio	1 bed	2 bed	3 bed	4 bed	5 bed	Total
Units	10	37	35	23	-	-	105 (66.8%)

7.48 On balance the scheme provides a good match with the Council's preferred unit mix for affordable housing (social rented and intermediate) housing specified in the Local Development Framework. The scheme provides 43% family units (3 bedrooms or larger) within the affordable rented housing, against the Council's target of 45%. It is noted that there is an under provision of three bed units within the intermediate mix with the total % of three bed units in the intermediate mix 18% against the target of 25%. On balance given the provision of family housing overall it is considered acceptable.

Ratio of Social Rented to Intermediate Housing

7.49 Of the affordable housing provision 76% would comprise social rented accommodation and 24% 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 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 Local Development Framework policy.

Overall Dwelling Mix

The Blue Ribbon Network – Limehouse Cut

7.50 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 as a site of nature conservation.

- 7.51 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.
- 7.52 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.
- 7.53 Policy OSN3 of the Local Development Framework states that development adjacent to the Blue Ribbon Network must respect its waterside location.
- 7.54 The development has been designed to improvement the relationship between the site and the Limehouse Cut and both British Waterways and the Environment Agency are supportive of this. Access along the canal would be improved and enhanced through the development via the provision of open space, provision of canal side walkway linkages and landscaping to complement this space.
- 7.55 The applicant has agreed to contribute £10,000 to British Waterways to assist in the facilitation works to improve the aesthetic amenity and access to the Limehouse Cut. This may include the upgrading of the towpath from Bow Common Lane to Abbots Wharf and access improvements to the canal (new gateway and resurfaced ramp). It is envisaged that this contribution would be pooled with other developments within the area.
- 7.56 In relation to the Environment Agency's objections to the scheme, the applicant has demonstrated that river wall maintenance is possible in the proposed scheme and has provided a commitment to submitting a report on the condition of the canal wall prior to the commencement of the development. Officers consider that the above issues can be appropriately conditioned. The information submitted would be considered in consultation with the Environment Agency.

Energy Efficiency

- 7.57 The Local Development Framework 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).
- 7.58 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.

The GLA notes in their Stage 1 response that the applicant has submitted an energy strategy which dismisses combined heat and power technologies. The Mayor has recently indicated support for development directly opposite the site at Thomas Road for a similar mixed use scheme. This particular scheme proposed combined heat and power technology as being a preferred option to meet base heat demand. The GLA suggest that the applicant carry out a feasibility appraisal into linking into this development to deliver a site wide community

- 7.59

heating solution.

- 7.60 The applicant has provided a response to the GLAs recommendations. The applicant's energy consultant confirms that they support the recommendation to consider a combined energy strategy with development at Thomas Road and will undertake a feasibility study to determine if it is technically and financially viable for a combined energy strategy to be entertained. It is recommended that details of this study and compliance with energy policy be secured through relevant planning conditions.

Transport & Parking

- 7.61 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. 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.
- 7.62 The site, which has a PTAL of 3, is generally well located in terms of public transport. As part of the development, a contribution of £20,000 will be made to Transport for London towards the installation of the Docklands Arrival Information System (DAISY) which can provide real time departure information on DLR services from nearby stations. Provision of DAISY boards throughout the development can form part of the green travel plan. In addition a contribution of £150,000 will be made to the London Borough of Tower Hamlets to improve accessibility between the site and the wider area including pedestrian enhancements and improvement works from St Paul's Way School to Mayflower Primary and St Mary's and St Josephs Primary School.
- 7.63 Transport for London is additionally requesting a total contribution of total of £270,000 (£90,000 over three years) to be provided towards improved bus network capacity via the London busses Route Sponsorship Agreement.
- 7.64 As part of the Transport Assessment prepared for the scheme it was suggested that the peak passenger generation period for the scheme would be between 3pm and 5pm. During this hour period data estimates that approximately 80 bus trips could be made that relate to the scheme, including trips to and from the site.
- 7.65 The site is accessible to a total of six existing bus routes and the Dockland Light Railway at Devons Road station. The Public Transport Accessibility Level assessment carried out as part of the Transport Assessment fully details these routes. During the peak hour on average there are at least five buses or DLR trains in each direction on each route. Assuming an even distribution across these public transport routes, the actual increase in passenger numbers on each service would be minimal.
- 7.66 Therefore, it is considered neither necessary nor reasonable that the proposed development should be required to fund an additional bus service with a contribution of £270,000. The level of financial contribution already committed to funding local transport and accessibility improvement as well as the boroughs priorities such as affordable housing, health and education is considered sufficient.
- 7.67 It is proposed to provide a total of 30 car parking spaces on the site; this includes three disabled car parking spaces. The car parking provision complies with the maximum requirement as specified in the LDF of for a maximum of 0.5 spaces per 1 dwelling unit.
- 7.68 A total of 157 cycle parking spaces are proposed adjacent to the car parking and within the commercial and residential components of the development. 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 parking area. Secure cycle parking should also be provided at ground level associated with the commercial units. The above requirement could be secured via a condition of approval.

Amenity

7.69 UDP Policy DEV2 and policy DEV 1 Amenity of the Local Development Framework 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.

7.70 Overlooking & Privacy

It is considered that the proposed development would not result in any unreasonable overlooking or loss of privacy to surrounding development. The proposal is massed in two separate buildings each with a separate relationship to Bow Common Lane, the Limehouse Cut and surrounding development. Given the siting of the buildings on the site, habitable room windows of dwellings within the development would be located a reasonable distance from adjoining development to the east and west of the site, thereby minimising potential for loss of privacy and overlooking of surrounding properties.

7.71 Sun/Daylight

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.

In relation to daylight VSC plots were undertaken for seven neighbouring window reference points to the east and west of the application site. The VSC results demonstrate that six of the seven window reference points assessed will adhere to the BRE VSC Guidance. This includes properties within development at 9-63 Bow Common Lane, 14 Bow Common Lane and properties surrounding Invicta Close to the east of the site.

7.73 The development will result in a degree of change in the VSC level experienced at window reference 4 which is slightly below the BRE target of 0.8 (0.72). This relates to an assumed window position at first floor level in the rear elevation of 12 Bow Common Lane. (The rear sections of this property and No. 14 Bow Common Lane were not accessible during the site visits and thus a worst case scenario has been adopted, window positions are thus assumed).

7.74 In relation to sunlight availability plots have been carried out for the three neighbouring window reference points oriented within 90 degrees due south. The sunlight availability plots show that all three of the window reference points assessed will receive annual and winter sunlight levels above the BRE target levels with proposed development in place. It is therefore concluded that the scheme will not result in any unacceptable sunlight impacts.

7.75 Overshadowing

Overshadowing plots have been prepared to illustrate the impacts of the development on sunlight levels received within neighbouring gardens and areas of amenity space at the March equinox. The plots show that the proposed development will not result in any overshadowing of the neighbouring gardens or amenity space during the morning and only limited additional overshadowing during the early afternoon.

7.76 In terms of internal solar access the levels of sunlight received by the proposed residential units proposed within the development have been assessed for the 21st March (spring equinox). The results reveal that a majority of units within the development will receive direct sunlight throughout the day. The following points should be noted:

- The residential units fronting Bow Common Lane with block A/B will receive direct sunlight through the late morning and afternoon on 21st March.

- The orientation of the site and the configuration of the blocks will ensure that the proposed courtyard space will receive high levels of direct sunlight during the morning on 21st March.
- The residential units within the rear elevation of block A/B will receive direct sunlight during the early morning on the 21st March.
- The south westerly facing units within block C/D will all receive direct sunlight during the late morning. The units to the south of the buildings entrance will receive sunlight until 2pm.
- The south westerly facing elevations of the dual aspect units fronting the Limehouse Cut in Block C will receive direct sunlight throughout the morning. The north western units and units within the upper floors will also receive direct sunlight throughout the morning.

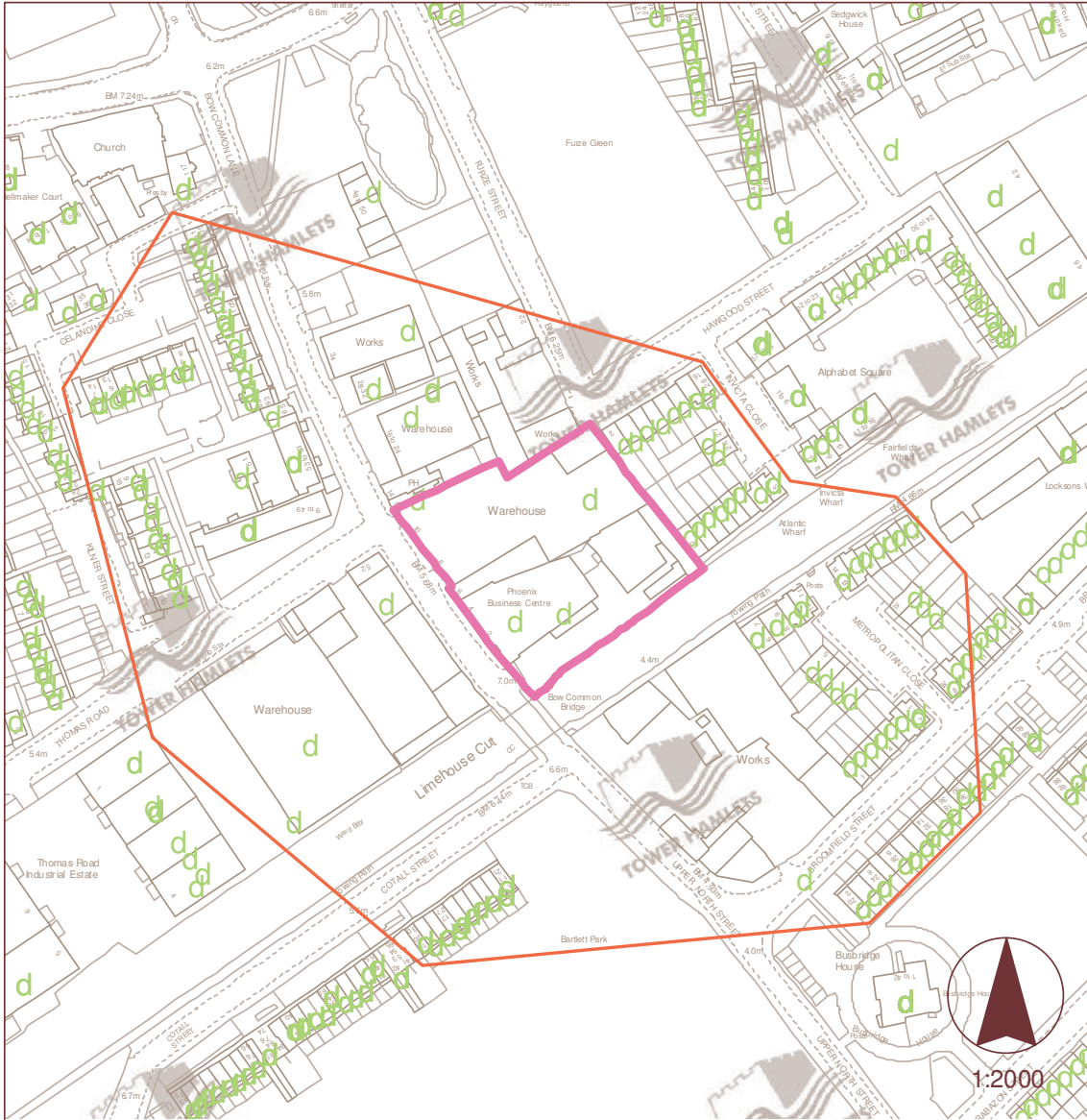
7.77 Microclimate

The microclimatic conditions (wind assessment) as a result of the development have been assessed. The report concludes that the proposed development will not cause any adverse wind conditions on or around the site. The assessment shows that wind conditions would promote pleasant and comfortable outdoor areas and abate any adverse wind conditions both within the development and the surrounding area.

8.0 CONCLUSIONS

- 8.1 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

This page is intentionally left blank

Agenda Item 8.5

Committee: Strategic Development	Date: 21 st June 2007	Classification: Unrestricted	Agenda Item No: 8.5
Report of: Corporate Director of Development and Renewal		Title: Planning Application for Decision	
Case Officer: Rachel Blackwell		Ref No: PA/07/00935	
		Wards: Milwall	

1. APPLICATION DETAILS

Location:	Site south of Westferry Circus and west of Westferry Road, London
Existing Use:	Construction storage area
Proposal:	Erection of Class B1 office buildings (324,888 sq. m) comprising two towers of 45 and 35 storeys (max 241.1m and 191.3m AOD) with a lower central link building (77.450m AOD) and Class A1, A2, A3, A4 and A5 uses (retail, financial/professional services, restaurant/ café, drinking establishments and hot food takeaway) at promenade level up to a maximum of 2367 sq.m together with ancillary parking and servicing, provision of access roads, riverside walkway, public open space, landscaping, including public art and other ancillary works. (total floor space 327,255 sq.m)
Drawing Nos:	900-50007, 900-50008, 900-50009, 900-50009M, 900-50010, 900-50010M, 900-50011, 900-50012, 900-50013, 900-50014, 900-50015, 900-50016, 900-50017, 900-50018, 900-50019, 900-50020, 900-50021, 900-50022, 900-50022M, 900-50023, 900-50024, 900-50025, 900-50026, 900-50027, 900-50028, 900-50029, 900-50030, 900-50031, 900-50032, 900-50033, 900-50034, 900-50035, 900-50036, 900-50037, 900-50038, 900-50039, 900-50040, 900-50041, 900-50042, 900-50043, 900-50044, 900-50045, 900-50046, 900-50047, 900-50048, 900-50049, 900-50050, 900-50051, 900-50052, 900-50053, 900-50054, 900-50055, 900-50056, 900-50201, 900-50231, 900-50301, 900-50302, 900-50311, 900-50312, 900-50321, 900-50322, 900-51000 Environmental Statement – RPS – March 2007 Environmental Statement – Non Technical Summary – RPS - March 2007 Environmental Statement – Volume 6 Supplement – RPS - May 2007 Environmental Statement – Revised Chapter 3 – Regulation 19 for Further Information Sunlight/Daylight Mitigation Design & Access Statement - Rogers Stirk & Partners - March 2007 Planning Statement – March 2007 Consultation Statement Transport Assessment – Steer Davies Gleave - March 2007 Schematic Landscape (indicative only – not for approval) – Rogers Stirk & Partners - May 2007
Applicant:	Canary Wharf Ltd C/- DP9
Owner:	Canary Wharf Ltd
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		Eileen McGrath 020 7364 5321

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:

- This application seeks approval for a series of revisions from the previously approved scheme on the site, dated 8th June 2005 (PA/03/00377). In principle, the proposed development is acceptable, subject to an appropriate planning obligations agreement and conditions to mitigate against the impact of the development.
- It is considered that the development 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 relating to materials, landscaping, external lighting, and plant, and to control noise and hours of construction.
- The submitted Environmental Impact Assessment is satisfactory, including the cumulative impact of the development, with mitigation measures to be implemented through conditions and a recommended legal agreement.
- The development would form a positive addition to London's skyline, without causing detriment to local or long distant views.
- The scheme would result in the benefits of job creation. The development would also enhance the streetscape and public realm through the provision of a public open space area and improved pedestrian linkages through the site and along the River Thames.
- The proposal incorporates a number of sustainability measures.

3. RECOMMENDATION

3.1 That the committee resolve to **GRANT** planning permission subject to:

A. Any direction of the Mayor;

B. The prior completion of a **Legal Agreement** to the satisfaction of the Chief Legal Officer, to secure the following:

1) Public Transport

Contribution towards DLR enhancement works - **£3,000,000**;

Contribution to TfL towards enhancements to the No. 135, 330 and the 330 bus services (**£900,000 – paid in sums of £300,000 per annum**);

2) Public Realm

Provision and maintenance of the new open space at the southern end of the site, the riverside walkway within the site and other areas of public realm within the site - **£5,343,000**;

3) Isle of Dogs Community Foundation

Contributions towards social and community facilities - **£2,500,000**;

4) Highways Works

Provision of pedestrian crossing to the north of Heron Quays Roundabout - **£236,000**

Contribution towards upgrade of Heron Quays Roundabout - **£607,000**

5) Lease of Skills Match / IDEA Store

16 years 6 month lease of the IDEA Store / 10 year lease of the Skills Match Unit at peppercorn rents - **£5,312,000**;

6) Community and Social Infrastructure Provision – projects to be determined through strategy for each area - total of **£4,545,000**

- Employment, Skills and Training
- Sustainable Transport Initiatives
- Public Realm, Design and Open Space Improvements
- Sports facility improvements

7) Preparation of a Travel Plan Framework - to be completed prior to the commencement of the development. The Travel plan will be subject to ongoing monitoring and review

8) Code of Construction Practice

9) TV and Radio Reception

3.2 That the Head of Development Decisions be delegated power to impose conditions and informative on the planning permission to secure the following:

Conditions

1. Time limit;
2. Details of the following are required prior to the commencement of the development:
 - a) Samples of all external building materials including a 'typical cladding detail mock up.'
 - b) Detailed design of all lower floor elevations, including shop fronts;
 - c) Details of hard soft landscaping, including walkways, design and layout of new park, tree planting scheme, street furniture, CCTV and all external lighting;
 - d) Public art;
 - h) Details of all boundary wall treatments including walls, fences, railings and gates;
3. Submission of details of external ventilation/extract ducts to A3, A4, A5 units;
4. Submission of details of high level/roof top plant and sound attenuation;
5. Submission of details of refuse/recycling proposals, including a waste management strategy;
6. Submission of details of disabled access (also to address the matters raised in councils letter of the 15th May 2007 in regards to accessibility);
7. Submission of details of the location of a proposed taxi rank;
8. Submission of details of the location of suitable riparian life saving equipment along the riverside walkway;
9. Submission of details of external lighting to be used during construction and on completion of the development to be considered in consultation with the Port of London Authority;
10. River Barges must be used where feasible for the transport of materials to/from the site in both construction and on completion of the development. A strategy must be submitted detailing the use of barges to be considered in consultation with the Port of London Authority;
11. Submission of a landscape Management Plan;
12. Planting, seeding Turfing;
13. Submission of a Ecological Management Plan detailing ecological mitigation measures throughout the development, including timber fenders and enhancements to the river wall, use of native vegetation in landscaping proposals, provision of brown roofs, green walls and bird boxes.
14. Completion of the restaurant/retail units prior to occupation of any other part of the Development.
15. Submission of details of the method of construction including details of use location and height of cranes and other structures to be considered in consultation with London City Airport;
16. When not in use cranes are to be parked parallel to the runway centre line with London

City Airport;

17. Buildings must be equipped with aircraft obstacle lighting.
18. Submission of design specifications of acoustic screens for cooling towers/air cooled chillers;
19. Submission of a Construction Environmental Management Plan (EMP) setting out measures to be applied during the construction phase, relating to site planning, construction vehicles, demolition and construction activities on the site;
20. The following parking spaces are to be provided:
 - A maximum of 150 car parking spaces of which 10% must be allocated for disabled users.
 - A minimum of 1300 cycle spaces for the office element and a minimum of 8 spaces located at the entrance for the retail element.
 - 132 motorcycle spaces.
21. Restriction of access from podium level down to Westferry Circus to Emergency Vehicles only.
22. Submission of a detailed plan to ensure that the barrier to the basement access is setback from the highway in order to allow for sufficient space to allow for queuing vehicles.
23. Submission of a service management plan detailing a servicing scheme for deliveries and servicing throughout the site;
24. Limit hours of construction to between 8.00 Hours to 18.00 Hours, Monday to Friday and 8.00 Hours to 13.00 Hours on Saturdays.
25. Air Quality Monitoring;
26. Level of noise emitted from the site to be restricted.
27. Ground borne vibration limits.
28. Limit hours of power/hammer driven piling/breaking out to between 10.00 Hours to 16.00 Hours, Monday to Friday.
29. Details of a monitoring and control regime of the Environmental Management Plan.
30. Investigation and remediation measures for land contamination (including water pollution potential).
31. Details of the construction of the site foundations.
32. Details of surface and foul water drainage system required.
33. Impact study of water supply infrastructure required.
34. Details of Water Efficiency measures.
35. Renewable energy measures to be approved in writing by the Local Planning Authority in consultation with the Greater London Authority and implemented in perpetuity.
36. Implementation of a programme of archaeological work in accordance with the written scheme of investigation.
37. S278 to be entered into for highway works surrounding the site.
38. Any other condition(s) considered necessary by the Head of Development Decisions.

Informatives:

1. Section 106 agreement required;
2. Section 278 (Highways) agreement required;
3. River works licensing (Port of London Authority);
4. Riparian lifesaving equipment provided to the 1991 Hayes Report Standards (Port of London Authority);
5. Site notice specifying the details of the contractor required
6. Construction Environmental Management Plan Advice
7. Use of Thames to transport bulky materials
8. London City Airport Advice
9. All cycle parking is to be provided in accordance with the London Cycle Network Manual.
10. Environmental Health Department Advice
11. Advertising signs and/or hoardings consent
12. Contact the GLA regarding the energy proposals
13. Any other informative(s) considered necessary by the Head of Development Decisions

- 3.3 That if by the 21st 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

Planning History

- 4.1 Planning permission was granted for the redevelopment of the site on the 8th June 2005 (ref PA/03/00377). This application proposed the following:

“Erection of B1 office buildings (273,171 sq.m) comprising two towers of 43 and 37 storeys (max. 220m and 195m AOD) with a lower central link building (53m AOD) and A1, A2, A3, A4 and A5 uses (A1 retail limited to 2499 sq m, financial/professional services, restaurants/cafes, pubs/bars, and hot food takeaways) at promenade level up to a maximum of 5904 sq m, together with ancillary parking & servicing, provision of access roads, riverside walkway, public open space, landscaping, including public art, and other ancillary works. (Total floor space of 279,075 sq m).”

Proposal

- 4.2 An Application has been made for full planning permission for the following:

“Erection of Class B1 office buildings (324,888 sq. m) comprising two towers of 45 and 35 storeys (max 241.1m and 191.3m AOD) with a lower central link building (77.450m AOD) and Class A1, A2, A3, A4 and A5 uses (retail, financial/professional services, restaurant/ café, drinking establishments and hot food takeaway) at promenade level up to a maximum of 2367 sq.m together with ancillary parking and servicing, provision of access roads, riverside walkway, public open space, landscaping, including public art and other ancillary works. (total floor space 327,255 sq.m).”

- 4.3 The rationale behind the reconsideration of the scheme is to refine and enhance the design and to respond to current market demands. The other major drivers include design improvements associated with enhancements in terms of townscape and views, demands for increased security, and increased energy efficiency.

External Appearance

- 4.4 The siting, of the three principal elements of the scheme is similar to those of the approved scheme. The two towers are placed in locations generally identical to the previous tower locations. The towers sit north and south of the existing Jubilee Line running tunnels, with the central trading building above the tunnels between the towers. The south face of RS1, the south tower, is in an identical position to that of the previous scheme. The north tower is moved marginally north within the overall site and retains the same relationship to Westferry Circus as the approved scheme.
- 4.5 In order to respond to potential tenant requirements, building plant accommodation and requirements for utility and enhanced security, the overall silhouette of the proposal has been modified. Furthermore, in response to the increased demand for plant and support space, and the requirement for unobstructed (column-free) trading floors the existing massing has been modified to result in a different plan form and building heights.
- 4.6 RS1 would be the tallest of the three buildings at a height of 241.140 AOD. RS2 would be 191.340 AOD. RS3 would be 77.45m AOD. These heights include building plant space and aircraft warning lights. The shoulders of the two towers would be 212.200m AOD for RS1 and 162.400m AOD for RS2.

Layout, Uses and Floor space

- 4.7 The scheme includes four levels of basements which comprise servicing areas, plant space, car parking and cycle parking. Above the basement, RS1 rises to 45 levels, RS2 35 levels and RS3 7 levels.
- 4.8 The majority of the floor space within the development is for office use, including ancillary uses such as restaurants, gymnasia and conference facilities. Retail uses are proposed at promenade and ground levels within RS2 in order to maximise accessibility to the public. The retail floor space is proposed to be within Class A1 – A5 uses to complement the existing retail facilities within the Canary Wharf Estate and serve the needs of office occupiers, visitors and residents.
- 4.9 At ground and promenade level, the retention of retail uses to the south of the site was reconsidered to relate to concerns raised in respect of the approved scheme by residents to the south regarding potential noise nuisance associated with users of bars and restaurants. Therefore, these uses have been concentrated to the north of the site where they will be closer to existing bars and restaurants at Westferry Circus.
- 4.10 The breakdown of the proposed floor spaces are set out below:

Floor space	Proposed sq. m (GEA)
Class B1 Office	324,888
Class A1 to A5 Retail	2,367
Total Floor space	327,255
All parking, servicing, access, plant and storage areas for the entire development (included within the B1)	91,730

Highways and Transport

- 4.11 The proposed vehicular access and egress points are:
- Vehicle access from Westferry Road north of the Heron Quays roundabout – exit and entry to loading docks and car park exit and entry for RS1/RS3.
 - Vehicle access from Westferry Road north of the Heron Quays roundabout – exit and entry for loading dock for RS2.
 - To north bound Westferry Road – relief ramp from upper ground level.
 - From lower Westferry Circus exit and entry for RS2.
 - Upper Westferry Circus entry and exit to RS1/RS3.
 - Upper Westferry Circus entry and exit for RS2.
- 4.12 A total of 150 car parking spaces are proposed. Of these, 120 would be for RS1/RS3 and 30 for RS2. There would be 132 motorcycle parking spaces and 345 bicycle spaces.

Landscaping and Open Space

- 4.13 It is proposed to provide a public park to the south of RS1 with 24 hour public access. There would be trees planted along the River Walk, within the public park and the areas of landscaping on the eastern sides of RS2 and RS1. Planting would be consistent with the standards across the Canary Wharf Estate.

Renewable Energy

- 4.14 As part of the revised scheme it is proposed that renewable energy technologies would provide a minimum of 10% renewable energy.

- 4.15 The planning application is accompanied by a Listed Building consent application (PA/03/00378) for alterations to the listed dock wall structure to facilitate the riverside landscaping works proposed in the application. These are minor matters to which English Heritage has no objection. It is recommended that the application be considered under delegated authority.
- 4.16 The application is accompanied by an Environmental Impact Assessment under the Town and Country Planning (EIA) Regulations 1999, and advertised as an EIA application.

Site and Surroundings

- 4.17 The site is located in the northern part of the Isle of Dogs, on land to the south of Westferry Circus. The River Thames forms the western boundary, with Westferry Circus to the north and Westferry Road to the east. To the south lies the South Dock Impounding lock. Westferry Circus separates Riverside South from Canary Riverside which are linked by a riverside walkway.
- 4.18 The application site is approximately 2.52 hectares in area and is currently in temporary use for storage for construction at Canary Wharf.
- 4.19 There is a mixture of land uses surrounding the site. To the north of the site is the first phase of the Riverside development, Riverside Phase I (north), known as Canary Riverside, comprising residential, hotel, leisure, and retail uses in six buildings of between 5 and 23 storeys. To the south, and beyond the South Dock Impounding Lock is the Cascades residential development.
- 4.20 The Jubilee Line tunnels run under the site. The site is well located for public transport, being a short walk from the Canary Wharf, Jubilee Line station and Heron Quays, Canary Wharf and Westferry DLR stations.
- 4.21 The site does not fall within a conservation area but nearby Conservation Areas, including Narrow Street, St Matthias Church, Poplar and All Saints Church are identified within the Environmental Statement. The South Dock Impounding Lock wall to the south of the site is a Grade II listed structure.

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:

- Central Area Zone (5)
- Strategic Riverside Walkway (14)
- Sites of Nature Conservation Importance (10)
- Flood Protection Area (18)
- Within 200m of east/west Crossrail (2)

Policies:

DEV1	Design Requirements	Environmental Requirements
DEV2	Planning Obligations	
DEV4	High Buildings within the Central Area & Business Core	
DEV5	Strategic Views	
DEV7	Provision of Landscaping in Development	
DEV12	Design of Landscape Scheme	
DEV13	Street Furniture	
DEV17	Public Art	
DEV18	Protection of Waterway Corridors	

DEV46 & 47	Strategic Riverside Walkways and New Development
DEV48	Noise
DEV50	Contaminated Land
DEV51	Development & Waste Disposal
DEV55	Waste Recycling
DEV56	Nature Conservation & Ecology
DEV57 & 58	Development Adversely Affecting Sites of Nature
DEV62	Conservation Importance
DEV65	Protection of Existing Walkways
DEV69	Efficient Use of Water
CAZ1	Location of Central London Core Activities
CAZ3	Requirement for Mixed Use Schemes
CAZ4	Diversity, character and functions of the Central Area Zones
EMP1	Encouraging New Employment Uses
EMP2	Retaining Existing Employment Uses
EMP6	Employing Local People
EMP9	Business Use
T15	Transport and Development
T16	Impact of Traffic
T17	Parking Standards
T18-T21	Pedestrian Safety and Convenience
T24	Cyclists Needs in New Development
T27	Freight
S1	District Centre Policy
S6	New Retail Development
S7	Special Uses
S10	New Shop fronts
U2-U6	Tidal & Flood Defences

Emerging Local Development Framework

Proposals:

	Isle of Dogs Area Action Plan (AAP)
ID38	Development Sites (Employment B1, Retail & Leisure A1, A2, A3, A4 & A5)
CP15	Major Town Centre – Isle of Dogs Town Centre Frontage – Secondary
CP30	Public Open Space – River Thames Waterfront
CP33	Sites of Importance for Nature Conservation
CP36	Blue Ribbon Network – Tidal Water
CP36	Strategic Riverside Walkway
CP37	Flood Risk Area
CP43	Strategic Cycle Route

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
CP8	Tower Hamlets Global Financial and Business Centre and the Central Activities Zone
CP16	Vitality & Viability of Town Centres
CP17	Evening & Nigh time Economy
CP30	Improving the Quality and Quantity of Open Spaces
CP31	Biodiversity
CP33	Sites of Importance for Nature Conservation
CP36	Water Environment and Waterside Walkways

CP37	Flood Alleviation
CP38	Energy Efficiency and Production of Renewable Energy
CP39	Sustainable Waste Management
CP40	Sustainable Transport Network
CP41	Integrating Development with Transport
CP42	Streets for People
CP43	Better Public Transport
CP44	Promoting Sustainable Freight Movement
CP46	Accessible and Inclusive Environments
CP47	Community Safety
CP48	Tall Buildings
CP50	Important Views

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
DEV14	Public Art
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
DEV21	Flood Risk Assessment
DEV22	Contaminated Land
DEV27	Tall Buildings Assessment
RT2	Secondary Shopping Frontages
RT5	Evening & Nigh time Economy
OSN3	Blue Ribbon Network & the Thames Policy Area
CON5	Protection & Management of Important Views
IOD1	Spatial Strategy
IOD2	Transport and Movement
IOD5	Public Open Space
IOD6	Water Space
IOD7	Flooding
IOD8	Infrastructure Capacity
IOD9	Waste
IOD10	Infrastructure and Services
IOD13	Employment Uses
IOD15	Retail and Leisure
IOD16	Design and Built Form
IOD17	Site Allocations

Planning Standards

- Planning Standard 1: Noise
- Planning Standard 3: Parking

Supplementary Planning Guidance/Documents

Designing Out Crime
Sound Insulation
Landscape Requirements
Riverside Walkways
Shopfront Design

Spatial Development Strategy for Greater London (London Plan)

3B.1 Developing London's Economy
3B.2 Office Demand and Supply
3B.3 Office Provision
3B.4 Mixed Use Development
3C.1 Integrating Transport and Development
3C.22 Parking
3C.24 Freight Strategy
3D.2 Town Centre Development
3D.12 Biodiversity & Nature Conservation
4A.2 Spatial Policies for waste Management
4A.6 Improving Air Quality
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.11 Water Supplies
4A.12 Water Quality
4A.13 Waste & Sewerage Infrastructure
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
4B.9 Large scale buildings, design and impact
4B.15 London View Protection Framework
4C.1 Blue Ribbon Network
4C.2 Context for Sustainable Growth
4C.3 Natural Value of the Blue Ribbon Network
4C.4 Natural Landscape
4C.6 Flood Plains
4C.7 Flood defences
4C.8 Sustainable Drainage
4C.12 Sustainable Growth Priorities for the Blue Ribbon Network
4C.14 Freight uses on the Blue Ribbon Network
4C.17 Increasing Access alongside and to the Blue Ribbon Network
4C.20 Design
4C.21 Design Statement
4C.24 Importance of the Thames
4C.25 Thames Policy Area

Government Planning Policy Guidance/Statements

PPG1 Generally Policy and Principles
PPS1 Delivering Sustainable Development
PPG4 Industrial and Commercial Development and Small Firms

PPS6	Planning for Town Centres
PPG13	Transport
PPS22	Renewable Energy
PPG24	Planning & Noise
PPS25	Flood Risk

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 Highways Development

6.2 *Vehicle access*

- The visibility splay for the exit from the piazza level to Westferry Road lower level (fig 4.4 Transport Assessment) is inadequate. The speed of traffic approaching the lower roundabout, combined with the curving wall and large gradient difference results in vehicles pulling out of this junction being hidden from approaching vehicles. This exit is only acceptable if it is only used for emergency uses only. For this reason the exit needs to be barriered and controlled at the plaza level and all occurrences as to when the barrier is raised and lowered recorded and monitored.
- The car park entrance on the lower roundabout is acceptable providing the barrier is set back from the highway with sufficient space to allow for queuing vehicles.
- All other vehicle entrance and exit points are acceptable.

Motorcycle facilities

- The 132 spaces are considered to be acceptable.

Cycle spaces

- The comments regarding cycle spaces are not accepted, the LDF document calls for a minimum of 1112 spaces to be provided, the plans include only 345. This under provision is inadequate.

Bus Facilities

- The relocation of the bus stop at Westferry Circus could be acceptable. This is not a planning issue and must be agreed in consultation with Tower Hamlets and London Buses.

Pedestrian Facilities.

- The opening up of the site and permeability are considered to be acceptable. The riverside walkway and cycle route should be secured under a Section 106 Agreement to ensure continuous uninterrupted access.

Travel Plan

- The initial travel plan details are acceptable, however full details will need to be supplied and a regular monitoring system in place. This should be included in the Section 106 Agreement for consideration and approval. The travel plan must be submitted and approved before occupation.

Servicing

- A significant number of service vehicles would access the site throughout the day. The service yards are acceptable in size to deal with loading and unloading of this volume of traffic. There will need to be management of the service areas to ensure waiting and deliveries do not create delays on the surrounding highway network. A service management plan must be secured by a condition of approval prior to occupation.

Section 106

- The site already has a section 106 from the previous application; we would require them to uplift this contribution to pay for additional highway works that would need to be included as a result of the redesign of the application.
- There are additional works that will need to be done these include two new pelican crossings to be installed (the cost of these to include a commuted sum payable for maintenance over 15 years) and the proposed pelican crossing on the upper level of Westferry Circus. Any uplift must be sufficient to cover these costs.
- The river walk way must be secured under a Section 106.
- The Westferry roundabout and parts of Westferry road must be adopted by the council. This agreement which is still yet to be signed must be signed prior to occupation.

Section 278

- The frontage of this site will experience a number of alterations and works; this will require reinstatement of the pavement. This work should be protected by a section 278 agreement.

(OFFICER COMMENT: It is advised by Highways officers that the above issues can be dealt with through relevant conditions of approval and obligations of a Section 106 agreement.)

LBTH Strategic Transport

- 6.3 The Council's Strategic Transport Team has identified a number of relevant initiatives to be supported by the scheme and funded through Section 106 contributions, including:
- The provision of a City Bike Club;
 - Further feasibility work for the Sustrans proposals to provide a cycle bridge over the Thames between Tower Hamlets and Southwark; and
 - Enhancements to local bus services, including the potential of an improved public transport interchange serving the site.

LBTH Environmental Health

6.4 Air Quality

- A risk assessment of the construction phase must be conducted. Due regard must be given to the London Best Practice Guide. Once a score is obtained, a detailed Code of Construction Practice (CoCP) must be submitted detailing how the developer intends to mitigate for dust and emissions from the construction phase.
- Due to the proximity to sensitive receptors, it would be appropriate to seek Section 106 funding for air quality monitoring (PM10 and PM2.5 and dust depositional monitoring).
- The ES has not made mention of potential emissions from boiler plants. This should be accounted for; and at some stage a D1 stack height calculation should be submitted by the applicant detailing the discharge point of the flue.

(OFFICER COMMENT: Following discussion with LBTH Air Quality Officer it is considered appropriate to secure air quality monitoring as a condition of approval.

Contaminated Land

No comment received.

Noise

No objections. The following information required:

- Design specifications of acoustic screens for cooling towers/air cooled chillers.
- Draft Construction Environmental Management Plan when it becomes available.
- The internal office working environment to be designed to meet the requirements of BS 8233:1999

LBTH Energy Efficiency Unit

6.5 No comment received.

LBTH Education Development

6.6 No comment.

LBTH Access to Employment (Skillsmatch)

6.7 The Council's Access to Employment Manager has confirmed that the Council would not seek to extend to lease of the Skills Match Building beyond that secured under the existing S106 agreement. The new agreement will therefore need to re-confirm the existing terms.

The Council's Head of Skills Match Service has confirmed that a contribution is required in terms of funding the Skills Match operation. This will enable local residents to gain access to employment during both the construction phase of the development and once the development is operational. In addition, further contributions are sought to improve access to wider employment opportunities within the Canary Wharf Estate for Borough Residents, through the Employment Task Group.

LBTH Ideas Store

6.8 The Head of Ideas Stores has confirmed that the Council would not seek to extend the lease of the Idea Store beyond that secured under the existing S106 agreement.

LBTH Building Control

6.9 Buildings and access should be designed in accordance with the Building Regulations. Fire Service access to the site and in particular to the fire fighting shafts should be in accordance with Approved Document B5 and/or BS5588 Part 5.

LBTH Horticulture & Recreation

6.10 The local LAP Director and Open Space Officers have confirmed that additional Officer workers from Canary Wharf will place pressure on what are already limited sports facilities within the Borough – in particular outdoor sports pitches. There may be opportunities to improve existing facilities at the Work House in Polar, Poplar Park and King Edward Memorial Park in Shadwell through Section 106.

LBTH Corporate Access Officer

6.11 The following access issues are outlined below.

Stair access to riverside walkway

- The positioning of the stair access to the riverside walkway creates a blind corner where people could loiter. The stair should be located adjacent to the wall to remove this space.
- A central handrail should be provided on the stair access.
- Several 'dead areas' are present which create poor orientation/permeability and encourage loitering.

Lifts/ internal

- How do the lift accesses work within the buildings - are they accessible to persons with disabilities?
- In windy conditions the side doors adjacent to revolving will be difficult to open.
- The width of doors/gates, etc on ground level do not meet DDA requirements.
- Separate disabled toilet facilities within building required.

Vehicle and Pedestrian Access

Vehicle access dominates the public realm and the width of the carriageway should be reduced. This should be treated as a shared surface for both vehicles and pedestrians providing access into the development. What is the proposed road surface? A champer curb should be used to ensure access for persons with disabilities.

(OFFICER COMMENT: Details of the above should be submitted prior to the commencement of the development).

English Heritage

- 6.12 The proposals involve amendments to the scheme granted permission in 2005. The original scheme was one of three schemes for tall buildings within the area considered by our London Advisory Committee on 16 May 2003. The letter of 3 June 2003 noted that *'The Riverside proposals are considered to of a high architectural standard and to have a modest impact upon the historic environment. Nevertheless the forceful presence of new towers on the river's edge is of concern, as is the resulting impact on local and long distance views. The scheme also adds to the overall width of the growing cluster of towers when viewed from Greenwich Park'*. These comments hold true for the current revised proposal.

The letter also noted that *'the architect has acknowledged that further work needs to be done to improve the way in which the proposals address the ground and relate to Westferry Circus.'* Page 20 of the Design and Access Statement submitted with the current application notes however that *'The general siting and disposition of buildings, as well as their relationship to the river and Westferry Circus remain as the approved scheme'*.

English Heritage (Archaeology) (Statutory Consultee)

- 6.13 Recommended condition to secure a programme of archaeological work.

Environment Agency (Statutory Consultee)

- 6.14 The Environment Agency objects to the application on the following basis:

Insufficient mitigation measures have been submitted. It has failed to adequately mitigate for the impacts of the development on the environment and to enhance the biodiversity value of the site in line with current policy. The mitigation proposed in the environmental statement would benefit the site but this has not been followed through in the remainder of the submitted plans and documents.

Resolution

- *A number of mitigation measures have been included in the Environmental Statement, including brown roofs; the attachment of timber fenders to the river wall;*

native planting on the site; green walls and the introduction of bird boxes.

- The applicant has discussed building a new flood defence wall as part of the proposals as part of the development and as part of this, potentially setting back the existing wall by up to 1 metre. We strongly supported this option as it would generate new UK BAP mudflat habitat and also help to mitigate for the negative impact on the foreshore. However the setback option appears to not have been continued as part of the scheme.*
- The use of timber fenders and enhancement through planting have not been addressed in the scheme. The documents do not include any information on the detail or location of the proposed timber fenders.*
- The proposed soft landscaping is located to the rear of the site. The Environment Agency seeks to incorporate native vegetation adjacent to the river to enhance the river corridor for wildlife and to benefit the River Thames. The river wall and adjacent riverside is all part of the River Thames corridor with the river designated as a Site of Metropolitan Importance (SMI) by the London Ecology Unit (LEU).*
- Figure 3.16 in Volume 2 of the ES shows two areas labelled as 'Potential areas for brown roofs'. The areas marked do not provide sufficient mitigation when the scale of the overall footprint is considered and the loss of brownfield habitat. The ES refers to the sighting of a black redstart on the site in February 2007 therefore the site has been used by the species. Currently only 800m² is proposed for brown roofs. The total Gross External Area (GEA) floor space is over 327,000m². We feel that a development of this scale should provide an increased area of habitat.*
- In addition to its small size, the area proposed for the brown roof will be flanked on either side by 190 metre and 240 metre buildings, which will affect the amount of light and heat the site receives. Wind speed travelling between the two buildings is also likely to be an issue. In order for this roof to be considered as an area for possible mitigation the applicant will have to demonstrate that it will be conducive to supporting black redstarts.*
- There is no further provision for green walls or bird boxes in the scheme.*

(OFFICER COMMENT: The Environment Agency have verbally withdrawn their objection and have recommended that the above be biodiversity matters be secured through a condition of approval requiring an ecological management plan for the site. This plan would be considered in consultation with the Environment Agency. Wording of this condition is to be confirmed in writing by the Environment Agency.)

British Waterways

6.15 No objections.

Greater London Authority (Statutory Consultee)

6.16 The revised scheme remains acceptable from a strategic planning perspective. The amendments do not result in any significant additional adverse environmental effects that were not addressed as part of the previous planning permission. The design refinements will result in more elegant and striking buildings and the inclusion of renewable energy technologies is particularly supported. However, Transport for London have a number of issues which need to be resolved before planning permission is granted.

(OFFICER COMMENT: These details are outlined and addressed in the material planning considerations section of this report.)

Corporation of London

6.17 No objection

London City Airport

6.18 No safeguarding objection subject to conditions:

- Prior to commencement details of the method of construction including the details of the use location and height of cranes and other plan and equipment or temporary structures shall be submitted and approved in writing by the LPA in consultation with the operator of London City Airport and the Civil Aviation Authority.
- When not in use the cranes are to be parked parallel to the runway centre line at London city airport.

Metropolitan Police

6.19 No comment received

CABE

6.20 No comment

Natural England (Statutory Consultee)

6.21 No comment received.

BBC – Reception Advice

6.22 No comment received.

Greenwich Society

6.23 No comment received.

LB Greenwich

6.24 No objections.

LB Southwark

6.25 No objections.

Thames Water

6.26 No comment received.

London Fire & Civil Defence Authority

6.27 No comment received.

Port of London Authority

6.28 No objection. Recommends:

- Condition requiring submission of external lighting details – to ensure minimal impact to navigation;
- Barges should be used to transport materials during construction;
- Informative regarding the river works licensing;
- If river wall repairs are to be consulted, please consult with the POL Authority;
- Condition requiring provision of riparian life saving equipment.

National Air Traffic Control Services

6.29 No objections.

7. LOCAL REPRESENTATION

7.1 A total of 996 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 (April 2007):

No of individual responses: 7 Objecting: 7 Supporting: 1

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

Public Park/Riverside Walkway

The proposed public park location to the south of the site could cause disturbance to residents of the Cascades building. As such the public park should not be open 24 hours.

The Thames walk/path should be maintained and improved as part of the scheme. Hundreds of walkers, cyclists, etc, use this route on a daily basis. Pedestrian access along this path should be retained during construction. This has been achieved on nearby sites such as London Arena and Pan Peninsula developments.

Retail/Active Frontages

There is objection to the removal of retail element at ground level along the river and to the south of the site. The removal of the retail element and active frontages may lead to this area being blank and sterile with little activity.

Access

The pedestrian access to the east is awkward. As most people approach the building from either Canary Wharf tube station or Heron Quays DLR.

Construction Impacts

There should be strict controls over construction hours at the site given potential disturbance to surrounding residential properties.

The Cascades outdoor garden is subject to large amounts of dust and debris associated with the 22 Marsh Wall development. Any new works on the subject site will lead to an increase in this impact. A suggested solution would be for Canary Wharf to contribute towards the ongoing maintenance of Cascades paid for by residents through the service charge for cleaning, etc.

Height & Views

The increase in height to the towers goes against the policy of centering towers around one Canada Square. The proposal is out of context with surrounding development at Canary Wharf.

The proposal will block views and aspect to surrounding residential properties.

Noise

The proposal will lead to an increase in noise in the area.

Supporting

One letter of support was received. The letter states that there are no objections to the development of the site and the expansion of the area is welcomed.

8. MATERIAL PLANNING CONSIDERATIONS

8.1 The main planning issues raised by the application that the Committee must consider are:

1. Policy Requirements
2. Tall Buildings
3. Design & Layout
4. Amenity
5. Sustainability & Renewable Energy
6. Transport
7. Biodiversity

Policy Requirements

- 8.2 The principle of land use and development of the site has previously been accepted through the granting of the existing planning permission (PA/03/00377) on the 8th June 2005.
- 8.3 The site was previously used as a construction storage area. The existing planning permission (PA/03/00377) is currently being implemented and earthworks have commenced on the site.
- 8.4 The Isle of Dogs area, within which the site is located, is identified in the London Plan as an Opportunity Area within the East London Sub Region. Policy 5C.1 identifies indicative estimates of growth. Both the Isle of Dogs and Canary Wharf are known globally as an area which provides a focus for financial and business services. The number of jobs within the area has risen from 19,000 in the early 1990's to 57,000 in 2001. It is identified that in the future policy should seek to expand and consolidate this role. The area should aim to accommodate at least 150,000 jobs by 2016.
- 8.5 The site is identified on the proposals map of both the Unitary Development Plan and the Local Development Framework as being located within the Central Activities Zone. UDP Policy ST10, LDF policy CP8 and the Isle of Dogs Area Action plan recognise the need to further develop the key strategic and international role played by parts of the borough as a global and financial business centre. The policy identifies the northern parts of the Isle of Dogs as a leading global and financial centre involving large scale office development accommodating major corporate occupiers.
- 8.6 Specifically the subject site is allocated in the Isle of Dogs Area Action Plan as a location for Class B1 development with class A1- A5 floor space (Site allocation ID38). The Area Action Plan also seeks to promote employment uses which will support the development of a global financial and business centre at this location.
- 8.7 As previously stated the proposed land use is consistent with the scheme previously approved in June 2005. The scheme will incorporate 324,888 sq m of B1 office space, suitable for accommodating a wide range of financial and business services. The proposed office space is likely to generate approximately 11,359 jobs. The proposed development thus accords with the policies of the London Plan and the borough in terms of promoting the site and the area as a global financial centre whilst also seeking to provide employment opportunities to meet the needs of local residents.

- 8.8 The GLA state in their Stage 1 report that:
- 8.9 *“The LDA supports the proposed development given the economic and employment benefits associated with such a significant volume of office space proposed, and the associated enhancement in the quality and flexibility of London’s office market offer. The proposed development would contribute to the Isle of Dogs globally competitive business cluster and help meet employment projections as set out in the London Plan. The proposed scheme also contributes to the Mayor’s vision as set out in the Economic Development Strategy.”*
- 8.10 The LDA also welcomes the inclusion of employment and training contributions (skillsmatch) which will seek to improve the skills and employment opportunities for local people.
- 8.11 The London Plan seeks to maintain and improve retail facilities (policy 3D.3) through the maintenance, management and enhancement of local and neighbourhood shopping facilities. Policy 3B.4 seeks mixed use development where increases in office floor space are proposed in Opportunity Areas.
- 8.12 The London Plan, the LDF and Area Action plan identifies the Isle of Dogs/Canary Wharf as a centre for the focus of retail and leisure uses in order to protect and enhance the major town centre status of the area.
- 8.13 The site is identified on the LDF proposal map as forming part of this town centre. The proposed development seeks to provide 2367m² of retail and leisure space, (Class A floor space). The proposed retail and leisure uses within the scheme will assist in providing services for future office workers at this location whilst also assisting in the formation of vibrant mixed use areas at this location.
- 8.14 It is noted that the quantum of retail floor space proposed is less than that approved under the previous consent for this site (5,904m²). The proposed retail units are located at the base of the RS2 tower, at promenade level and upper ground level. The approved scheme proposed retail at the ground floor of RS1 overlooking the park, however as part of the proposed development this has been removed following concerns raised by residents of Cascades to the south about potential noise nuisance associated with users of bars and restaurants. The consolidated location of this retail accommodation is considered to be consistent with existing bars and restaurants around Westferry Circus. The proposed location of the retail within the development also assist in the creation of an active river frontage, complementing nearby public open spaces and the riverside walk, as well as adding to the quality of the retail offer within Canary Wharf as a whole.

Tall Buildings

- 8.15 The principle of the site as a location for tall buildings has been established by the approved scheme which comprised two towers of 218.7m (RS1) and 193.5m (RS2). As part of the proposed development the height of RS1 has increased to 241.14m whilst the height of RS2 has decreased to 191.34m, below the height of the smaller tower in the approved scheme. The height of the linking block, RS3 has increased from 51.5m to approximately 77.1m AOD.
- 8.16 Policy 4B.8 of the London Plan supports tall buildings in appropriate locations across London and states that the *‘Mayor will promote the development of tall buildings where they create attractive landmarks enhancing London’s character, help to provide a coherent location for economic clusters of related activities and/or act as a catalyst for regeneration and where they are also acceptable in terms of design and impact on their surroundings.’*
- 8.17 The UDP considers tall buildings to be appropriate within the Central Activities Zone, provided proposals are sensitive to the bulk, scale and massing of the surrounding area. The ability of transport infrastructure to accommodate the level of activity generated should

also be considered. The UDP states tall buildings should seek to emphasise a point of civic and visual significance, both locally and in relation to the urban scene or area from which it would be visible. This is particularly relevant to the Riverside South proposals given their prominent position in relation to both the River Thames and within the Canary Wharf Cluster.

- 8.18 Policy IOD1 of the AAP states that ‘tall buildings will be clustered around Canary Wharf (1 Canada Square) and building heights should be reduced from this point.’ Furthermore, Policy IOD16 states that the northern sub area will continue as a location for tall buildings and will form a cluster of the tallest buildings found on the Isle of Dogs. New tall buildings should help consolidate this cluster and provide new landmarks consistent with the national and international role and function of the area.
- 8.19 Policy DEV5 of the LBTH UDP states that tall buildings may be acceptable within the Central Area Zones subject to policies DEV1 and DEV2. The development will also:
- Not adversely impact upon the micro climate, wind turbulence, overshadowing and telecommunication interference;
 - Have access to appropriate transport and infrastructure;
 - Not adversely harm the essential character of the area or important views; and
 - Identify and emphasise a point of civic and visual significance
- 8.20 Policy CP48 ‘Tall Buildings’ of the emerging Core Strategy states that the Council will, in principle, ‘support 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’. Policy DEV27 of the emerging LDF Core Strategy and Policy 4B.9 of the London Plan, require tall buildings to be of the highest quality design and provide a set of criteria that applications for tall buildings must satisfy. The proposal satisfies the relevant criteria of Policy DEV27 as follows:
- The design is sensitive to the context of the site.
 - The architectural quality of the building is considered to be of a high design quality, as demonstrated in its scale, form, massing, footprint, proportion, materials, and relationship to other buildings, the street network, public and private spaces and the River Thames.
 - The proposed development does not fall within the strategic views designated in Regional Planning Guidance 3A (Strategic Guidance for London Planning Authorities, 1991) or the Mayor’s draft London View Management Framework SPG (2005). However, the scheme has demonstrated consideration of the appearance of the building as viewed from all angles and is considered to provide a positive contribution to the skyline.
 - The proposed development would achieve a high standard of safety and security for future occupants and users.
 - The proposed buildings would be visually integrated into the streetscape and the surrounding area.
 - The proposed development would present a human scaled development at the street level.
 - The proposed development would respect the local character and seek to incorporate and reflect elements of local distinctiveness.
 - The proposed development would incorporate adaptable design measures.
 - There will be minimal impact on the privacy, amenity and access to sunlight and daylight to surrounding residents.
 - The Environmental Statement demonstrates that the impact on the microclimate of the surrounding area, including the site and public spaces, will not be detrimental.
 - The proposed development demonstrates consideration of sustainability throughout the lifetime of the development, including the achievement of a high standard of energy efficiency, sustainable design, construction and resource management.
 - The impact on the biodiversity of the River Thames will be minimised through the provision of an Ecological Management Plan which will ensure that biodiversity on the

site will be generally improved through the proposed scheme.

- The proposed development will scheme high internal and external noise standards.
- The scheme will contribute positively to the social and economic vitality and of the surrounding area at the street level through its proposed mix of uses.
- The proposal incorporates the principles of inclusive design.
- The site is located in an area with very good public transport access.
- The scheme takes into account the transport capacity of the area, and ensures the proposal will not have an adverse impact on transport infrastructure.
- The proposed development would result in improved permeability throughout the site and to the surrounding street network
- The proposed development would contribute to high quality pedestrian routes including the strategic cycle network.
- The scheme provides publicly accessible areas within the development including 24 hour access to a public park.
- The scheme would conform with Civil Aviation requirements. Both NATS and City Airport have advised there is no safeguarding objection.
- The scheme would not interfere, to an unacceptable degree, with telecommunication and radio transmission networks.
- The scheme has considered public safety requirements and has demonstrated emergency access provision.

8.21 The GLA Stage 1 report provides the following comment on the scheme:

“The amendments do not result in any additional significant adverse environmental effects that were not addressed as part of the previous planning permission. The overall siting and design remains similar to the approved scheme, with two towers standing either side of the Jubilee Line tunnels and linked by a central podium. The design refinements will result in more elegant and striking buildings.”

Important Views

- 8.22 Policy CON5 – Protection and Management of Important Views of the Emerging Core Strategy states that the Council will resist development that has an adverse impact on important views, including panoramas, prospects and local views.
- 8.23 The Riverside South location falls within an existing cluster of tall buildings. The site is not within a Conservation Area nor close to listed buildings, other than the listed lock wall. The site is not within a Strategic Viewing Corridor and is not affected by the Draft London View Management Framework.
- 8.24 The principle of tall buildings on this site has been established by the approved scheme. The proposed development does not deviate from these established principles including the height, form and orientation of the towers and only makes relatively minor amendments to the overall heights.
- 8.25 The Impact of the increase in height is observed in number of views in the Townscape and Visual Impact Assessment. The principal consideration in terms of views relates to the additional storeys proposed in the revised scheme. The Scheme marks the western most edge of the Canary Wharf cluster and is considered an appropriate location for a building of this scale and design quality. It is considered that there is no immediate built context except for the vast expanse of River Thames. In all distant views, the change in height appears to be marginal in nature. There are number of sites identified as suitable for a tall building between Riverside South and Central Canary Wharf and the proposal will seek to contain towers of intermediate height and consolidate an emerging cluster. London Borough of Tower Hamlets Urban Designer supports the scheme in terms of its architectural design and townscape merit.

Design & Layout

- 8.26 Policy 4B.2 of the London Plan states that the Mayor seeks to promote world class design. Development proposals should demonstrate that developers have sought to provide buildings and spaces that are designed to be beautiful and enjoyable to visit, as well as being functional, safe, sustainable and accessible for all.
- 8.27 Policy 4C.20 seeks a high quality of design for all waterside development. All development, including intensive or tall buildings, should reflect local character, meet general principles of good design and improve the character of the built environment. Policy 4C.1 of the London Plan states that boroughs should recognise the strategic importance of the Blue Ribbon Network. Policy 4C.17 requires that boroughs protect, and improve access points to, alongside and over the Blue Ribbon Network.
- 8.28 In addition to London plan and tall building policies, the proposal also generally accords with the design and environmental Policies DEV1 and DEV2 of the 1998 UDP and Policy CP4 and DEV2 of the Local Development Framework 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.
- 8.29 Policy IOD1 of the Isle of Dogs AAP states that design will be managed by ensuring that development, considers, reflects and responds to the waterside location of the Island and contributes to making a unique location in the London context. The AAP further recognises that design has an important role in creating accessible, well connected, safe and secure environments that people can enjoy.
- 8.30 The design and layout of the proposed development is considered to be of high quality, reflecting the character of the surrounding context. The development will also result in the creation of a well connected public realm adding to the advancement of the area as a global financial business centre and a district centre thus assisting in the achievement of the objectives of policies within the London plan, the UDP, LDF and the Isle of Dogs AAP.
- 8.31 The site incorporates a Strategic Riverside Walkway, as designated by the UDP and emerging LDF document. This route is also part of the Sustrans route. The continuation and enhancement of the riverside walk from the existing waterfront at Riverside North will seek to ensure that continuation of this strategic route. The siting of retail units, intended to be predominantly Class A3 –A4 use, along the river frontage will allow the promotion of vibrancy as well as access to the river at this location. The retention of the riverside walkway thus meets the objectives of policies within the London plan, the UDP, LDF and the Isle of Dogs AAP and achieves the Mayors aspirations behind the creation of a Blue Ribbon Network along the River Thames.
- 8.32 As demonstrated in the Design and Access Statement and the indicative landscaping proposals the proposed development addresses the immediate demands of the space around the building and the wider urban context. The landscaping proposals seek to create an area of public realm that forms the riverside walkway and a public park at the southern portions of the site which will seek to provide an open space area for employees/residents and visitors whilst also acting as a buffer between the development and residential properties to the south. Further landscaping details including submission of details of lighting, signage and treatments of these public areas would be secured through conditions of approval prior to the commencement of the development in order to ensure high quality, useable spaces.

Materials

- 8.33 The architectural form and principal structure of the scheme has undergone refinement as a result of the revised scheme. The external appearance of the façade of the towers remains

similar to that previously approved, subject to the addition of further louvers.

- 8.34 In order to achieve a high quality finish details of final finishes and cladding details would be required for as a condition of approval including the detailing of all external materials and a 'typical cladding detailed mock up'.

Accessibility & Inclusive Environments

- 8.35 Policies 4B.1, 4B.4, 4B.5 of the London Plan seek to ensure that developments are accessible, usable and permeable for all users and that development can be used easily by as many people as possible without undue effort, separation or special treatment. Policy 3C.20 refers to the importance that connections from new developments to public transport facilities and the surrounding area (and its services) are accessible to all. Best practice guidance has been issued by the GLA (SPG Accessible London: achieving an inclusive environment, 2004).
- 8.36 Policies ST3 and DEV1 of the UDP require that development contributes to a safe, welcoming and attractive environment which is accessible to all groups of people. A growing awareness of the importance of creating environments that are accessible for all people has led the Council to emphasise the importance of 'inclusive design'. This is reflected in policies CP1, CP4, CP40, CP46 and DEV3 of the LDF Core Strategy submission document, which all seek to ensure that inclusive environments are created which can be safely, comfortably and easily accessed and used by as many people as possible without undue effort, separation or special treatment.
- 8.37 The proposed development has been designed in accordance with the principles of accessibility and inclusive design. The Access Statement has explored both access and egress issues, to and around the site as well as within the building itself. Consultation on accessibility throughout the design process has resulted in the inclusion of use by disabled people.
- 8.38 Options will continue to be considered throughout detailed design and beyond, to ensure the building is fully accessible. Further access assessment and consultation will be required throughout any future design progression.

Safety & Security

- 8.39 Further UDP Policies DEV1 and 2 and Policy DEV 4 of the Local Development Framework seeks to ensure that safety and security within development and the surrounding public realm are optimised through good design and the promotion of inclusive environments.
- 8.40 The scale of the proposed development and the likely number of occupants generated at this location will result in a greater concentration of activity within this area. As a result of this very substantial site population and of the security policies of tenants, the site will result in enhanced surveillance. An associated lighting and CCTV scheme will ensure that the site, its immediate connections and neighbouring spaces and links will be continuously observed by people and monitoring systems.

Amenity

Assessing daylight and sunlight

- 8.41 Policy 4B.9 of the London Plan refers to the design and impact of large scale buildings and includes the requirement that in residential environments particular attention should be paid to privacy, amenity and overshadowing.
- 8.42 DEV 2 of the UDP seeks to ensure that the adjoining buildings are not adversely affected by a material deterioration of their daylighting and sunlighting conditions.

- 8.43 Policy DEV1 of the draft Core Strategy states that development is required to protect, and where possible improve, the amenity of surrounding existing and future residents and building occupants, as well as the amenity of the surrounding public realm. The policy includes the requirement that development should not result in a material deterioration of the sunlighting and daylighting conditions of surrounding habitable rooms.
- 8.44 Daylight/Sunlight analysis is included as part of the Environmental Statement submitted with the application. The statement demonstrates that nearby buildings will not be adversely affected by the loss of privacy or material deterioration of daylighting and sun lighting conditions.
- 8.45 The Environmental Statement reports on the assessment of effects for sunlight and daylight and identifies minor adverse effects at six locations:
- Cascades
 - 1-9 Chandler Mews
 - 11-85 Anchorage Point
 - Berkley Tower
 - City Pride (public house)
 - Hanover House
- 8.46 A number of residents from within the cascades tower located immediately to the south of the site raised concerns in relation to sun and daylight impacts generated by the scheme. The potential impacts to the Cascades development have been addressed in the Environmental Statement.
- 8.47 The daylight assessments have shown that 143 (70%) of the 205 windows receive reductions in Vertical Sky Component (VSC) beyond the criteria suggested. These range between a 30 and 60% reduction. However the level of daylight remaining within all of the habitable rooms is sufficient to meet both the No Sky contour (NSC) and Average Daylight Factor (ADF) with the exception of one small porthole style kitchen window on each floor between the 1st and 20th floors. All of the living rooms would retain ADF values in excess of 5%.
- 8.48 No mitigation measures are recommended as adverse effects are of no more than minor significance.
- 8.49 Open spaces to the north of the site have been included within the assessment of overshadowing impacts as anything to the south will not be cast in shadow by the proposal.
- 8.50 There are three areas of open amenity space, located to the north of the site, which may receive some additional shadowing. These are: -
- Space in the centre of Westferry Circus roundabout;
 - Space to the north of Hanover House; and
 - Space to the south of Belgrave Court.
- 8.51 With the approved scheme in place, the centre of Westferry Circus roundabout and the space to the south of Belgrave Court, both receive no permanent shadow. The space to the north of Hanover House receives permanent overshadowing to 18.24% of its area. The BRE guidelines suggest that an open amenity space should not receive more than 40% permanent shadow and preferably no more than 25%. This is obviously easily complied with, with the approved scheme in place.

Noise

- 8.52 The Environmental Statement investigates the effect of the development on the acoustic

environment of the site and surrounding buildings. The main areas include road traffic, externally reflected sound, wind generated noise and noise emissions from building services plant. The results of the assessment show that noise as a result of traffic associated with the development would be of minor significance. No unusual effects are anticipated because of externally reflected sound or wind interactions with the facades.

Microclimate

- 8.53 The impacts of microclimate are assessed through a combination of meteorological data, analysis of the surrounding area and wind tunnel analysis, which was considered to be an appropriate methodology for a development of this nature. A number of mitigation measures are recommended including,
- Canopy and vertical fins along south face of RS-1;
 - Heavy tree planting and vertical screens in plaza area to south of RS-1;
 - A Vertical screen at NW corner of RS-2 and vertical louvers at NW and NE pedestrian walkways just north of RS-2;
 - Windy areas near Impounding Lock: Increased tree planting and plans for alternate Route;
 - E-W passageway between RS-2 and RS-3: enclosed E-W passageway between RS-2 and RS-3.

The results show that the proposed amelioration measures are effective in improving wind conditions in the majority of locations on the site. This is considered to be satisfactory.

Construction Impacts

- 8.54 A number of surrounding residents raised concerns in relation to amenity impacts during construction.
- 8.55 Works for the construction of the approved scheme have commenced. The construction programme for the proposed scheme will span approximately 52 months. A review has been undertaken of the potential environmental issues and adverse impacts associated with the construction works. In order to ensure that the construction works are managed and undertaken in accordance with best practice and statutory requirements a site specific Construction Environmental Management Plan, or CEMP, is being produced which would be agreed with the local authority.
- 8.56 The purpose of the CEMP is to identify potential adverse environmental issues, to specify measurable limits and targets, to detail the mitigation measures to be undertaken and the management tools and procedures required. The CEMP would cover all aspects of the construction activity, both on-site and those that may affect surrounding areas, for example the management of construction traffic. Other activities that may cause a nuisance to nearby residents and workers would be monitored.

Sustainability & Renewable Energy

- 8.57 The London Plan energy policies 4A.7-4A.9 aim to reduce carbon emissions by requiring the Incorporation of energy efficient design and technologies, and renewable energy technologies where feasible. Energy Efficiency is addressed in policy DEV6 which reiterates the Mayor's target of 10% of new developments' energy generated from renewable energy generated on site and a reduction of 20% of emissions. Policies DEV7, DEV8, DEV9 and DEV11 seek sustainable developments through water quality and conservation, sustainable Drainage, sustainable construction materials, air pollution and air quality.

Energy

- 8.58 The applicant has reconsidered its approach to energy from its consented scheme,

addressing both energy efficient design and sustainable supply technologies. The proposed office buildings will make use of passive design measures to increase energy efficiency. Use of daylighting will be maximised and specific efforts will be made to build an inclusive, safe and comfortable space. Energy will be conserved using a high-performance facade, zoning and independent controls and some of the site's energy demand will be met by localised energy generation. Renewable energy technologies, such as ground source cooling, photovoltaics and bio fuel boilers will also be incorporated into the building design.

- 8.59 The GLA have assessed the above energy proposals. The GLA considers that the proposed approach is consistent with the London Plan and should be secured by condition.

Water Conservation

- 8.60 Water efficient appliances will be installed throughout the building, and materials will be sourced responsibly.

Waste

- 8.61 A Waste Strategy has been prepared to address and recommend sustainable waste management practices and the environmental burden during construction activities is addressed by the Construction Environmental Management Plan.

Air Quality

- 8.62 The development would result in changes to traffic flow characteristics on the local road network. Effects of the proposed development on local air quality based on traffic flow predictions have been assessed.
- 8.63 An assessment shows that the effects of the proposed development are likely to be of slight adverse significance. In order to mitigate these impacts a Construction Environmental Management Plan (CEMP) will be drafted setting out measures to be applied throughout the construction phase would apply to site.
- 8.64 During the operational phase, encouraging sustainable transport and reducing dependence on the private car would reduce the impact of the development in terms of both greenhouse gases and pollutants.

Transport

- 8.65 Both the UDP and the Local Development Framework 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. Through the emerging Core Strategy the Council seeks to focus high density development in areas of high public transport accessibility (CP41).
- 8.66 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.

Strategic Transport

- 8.67 The site has a Public Transport Accessibility Level (PTAL) of 5 (very good). The Riverside South site is located adjacent to the transport hub of Canary Wharf and is served by the Underground (Jubilee Line – Stratford to Stanmore), the Docklands Light Rail (Bank/Tower Gateway to Lewisham/Royal Docks/Stratford) and a number of bus services (277, D3, D7 and D8) and is therefore in a highly sustainable location. The site is also adjacent to Canary Wharf Pier which is served by river transport.

8.68 It is intended that 97 per cent of employees are expected to travel to the site by public transport or other non car modes in peak periods. It is intended that the scheme will generate 21,720 one way employees and visitor trips per day, excluding service vehicles.

8.69 Transport for London (TfL) were consulted on the application as part of the GLA Stage 1 response. In principle TfL have no objections to this application provided the following issues are resolved satisfactorily.

“TfL considers that the transport assessment makes inadequate assessment of the pedestrian environment. Some measures such as improved pedestrian crossings and the provision of a riverside walkway are welcomed. However, other matters such as details of pedestrian routes to public transport, cycle routes and key points of interest together with conflicts vehicle access routes should be provided. A pedestrian capacity study should be carried out as there is particular concern about footway widths in parts of Heron Quays where around 2000 walking trips are estimated between the station and the site. TfL would welcome further discussion about these matters.”

“Since the previous application TfLs plans for the bus network in the vicinity of the development have progressed and that it is hoped that a new route 135 will be provided together with the extension of the existing route 330. These routes are required to meet existing capacity on the Westferry Road corridor. The transport assessment indicates that the development will have 320 inbound trips by bus in the morning peak. Assuming that this is split 50:50 by direction, this will generate the need for an additional 2.3 buses during this period. In order to accommodate this TfL requests a contribution towards increasing bus capacity of £300,000 per annum for three years, a total of £900,000. “

“The transport assessment assumes that the DLR three-car upgrade will provide the necessary capacity to accommodate the growth in trips associated with this development. It also assumes that passengers travelling in the Jubilee Line from the west would transfer from to the DLR in sufficient numbers to alleviate overcrowding. As with the previous permitted scheme TfL would therefore expect a contribution of £3 million towards DLR capacity enhancement works.”

8.70 The applicant has no objection to providing a contribution of £900,000 to TfL towards the upgrade to bus services in the vicinity of the site and this should be included in the Heads of Terms. Similarly the applicant has no objection towards providing a contribution of £3,000,000 to DLR to facilitate capacity enhancement works.

8.71 In relation to the pedestrian capacity study it is recommended that this be secured through a planning condition. The study would be considered in consultation with TfL. TfL have not provided clarification on how any impacts (if identified) would be mitigated.

Vehicle Access

8.72 The site is accessible by vehicles at two levels; the lower road level and the upper podium level. The main vehicular access for taxis and visitors will be provided at the podium level direct from the Upper Level of Westferry Circus.

8.73 At the lower level roundabout of Westferry Circus, an access will be provided to the B1 basement car park. On Westferry Road, between Westferry Circus and Heron Quays Road, two accesses will be provided to the B2 and B3 basement car parks, motorcycle parking and the loading bays.

8.74 A secondary egress only vehicle route will be provided from the podium level of the development, down to Westferry Road, close to its junction with the lower level of Westferry Circus. This will only be opened in emergencies or during periods when the exit onto

Westferry Circus Upper Level is blocked.

- 8.75 The vehicle access arrangements on the site have been assessed by Councils Highways Department as satisfactory. There is some concern over the safety of access from the podium level down to Westferry Circus as visibility would be poor for vehicles entering the network at this location. It is acknowledged that this access is noted for emergency vehicles only. In order to ensure improved vehicular safety at this location it is recommended that this emergency access be secured through conditions of approval.
- 8.76 In addition there was concern raised regarding the car park entrance at the lower level to Westferry Circus. It is recommended by highways that a detailed plan be submitted as a condition of approval to ensure that the barrier is setback from the highway in order to allow for sufficient space to allow for queuing vehicles.
- 8.77 The site would also accommodate a number of vehicle set down and pick up areas (adjacent to each building) as it is envisaged that some visitors to the site will travel by taxi or private vehicles. Delivery vehicles for both the office and retail elements of the development will use the loading docks, accessed from Westferry Road.
- 8.78 A vast majority of delivery and service vehicles are expected in the transport assessment to approach the site from the north and will be required to travel via the Heron Quays roundabout (u-turn) to access the loading docks. The drop-off facilities for each building are designed to accommodate occasional deliveries, but these are expected to be confined to small vans and couriers. It is recommended by Councils Highways Department that a service management plan be submitted as a condition of approval to ensure that servicing can adequately be accommodated on site to ensure minimal impact upon the road network and surrounding context.
- 8.79 Emergency vehicles will be able to travel around the perimeter of the site. The applicant has adequately demonstrated that emergency vehicles can make this movement.

Parking

- 8.80 Emerging policy DEV19 states that Council will minimise on and off street parking for all developments. All parking is to be in compliance with the Parking Standards, and the emerging Core Strategy sets maximum parking standards for retail and employment generating uses. The emerging Core Strategy sets out the maximum car parking standards that varies by type of use. For large developments in areas with good public transport (i.e., PTAL scores between 4 and 6) minimal parking is sought. For retail units no car parking is sought.
- 8.81 The application proposes 150 car parking spaces at basement level. 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.
- 8.82 TfL supports the reduction in car parking over the previously approved scheme. However, it should be adjusted so that disabled parking comprises 10% of total parking or 15 spaces. In addition given the projected taxi use, the development should provide for a formal taxi rank similar to those on the North Colonnade and South Colonnade in the Canary Wharf complex.

Cycle Accessibility

- 8.83 Policy CP42 encourages pedestrian and cycle permeability in new developments. The Council will ensure that new developments have a high level of connectivity with the existing and proposed transport, and pedestrian network. Policy DEV16 further promotes sustainable transport use, requiring developers to provide secure cycle parking, and routes through development. More specifically Policy IOD2 of the emerging AAP states that all

major destinations on the Isle of Dogs should be easily accessible for all and existing pedestrian and cycle links should be improved.

- 8.84 The Thames Path Cycleway runs along the riverside walk to the west and south of the site and forms part of the Sustrans national cycle network.
- 8.85 Both Council's Highways Department and TfL have assessed the cycle provision which includes the provision of 345 spaces. Cycle parking provision is significantly less than TfL's cycle parking standards as referred to in the London Plan (annexe 4 paragraph 37) and must be increased to 1,299 spaces for the office element and a minimum of 8 spaces, located at the entrance of the units, for the retail element. All cycle parking should be provided in accordance with the London Cycle Network design manual. In particular it should be covered and protected, as well as having security measures such as CCTV. The site is well served by existing cycle routes.

Biodiversity

- 8.86 Policies ST8, DEV57 and DEV62 of the UDP and policies CP31 and CP33 of the LDF Core Strategy submission document set out requirements in line with international, national and regional policy. These seek to ensure the protection, conservation, enhancement and effective management of the borough's biodiversity.
- 8.87 In accordance with Policy 3D.12 of the London Plan 2004, the Council produced a Local Biodiversity Action Plan (LBAP) which sets out priorities for biodiversity protection and enhancement. The Species Action Plan for black redstart is also of significant importance.
- 8.88 Policy 4C3 of the London Plan focuses on the Blue Ribbon Network and the importance to protect and enhance the biodiversity of the network by designing new waterside developments in ways that increase habitat value
- 8.89 The site is located adjacent to the Thames which is identified as part of London's Blue Ribbon Network and a site of nature conservation importance.
- 8.90 In accordance with Policy DEV47 and DEV48 of the UDP (1998) the proposal will improve the aesthetic amenity of the site and the river environs whilst also allowing for improved pedestrian access linkages through the site to the riverside walkway and the River Thames.
- 8.91 The scheme will also provide some 800m² of brown roofs which will seek to provide habitat for bird and invertebrate species such as the black redstart. Brown roofs will also assist in increasing energy efficiency and minimising water runoff volumes.
- 8.92 The design and layout of the scheme will also include a public park and areas of landscaping. Details of which are defined in the indicative landscape proposals provided. Appropriate planting within these areas (to be secured as a condition of approval) will also assist in the promotion of biodiversity on the site.
- 8.93 Biodiversity measures will be incorporated into the scheme through the submission of an Ecological Management Plan, which will detail provision of brown roofs, use of timber fenders to the river wall, bird boxes and native species, etc, in the use of landscaping. It is recommended that this be secured as an appropriate condition of approval. The wording of this condition will be agreed in consultation with the Environment Agency.

Environmental Impact Assessment

- 8.94 The Council's consultants, Bureau Veritas undertook a review of the Environmental Statement. The review highlighted a number of areas where additional information or clarification should be provided.

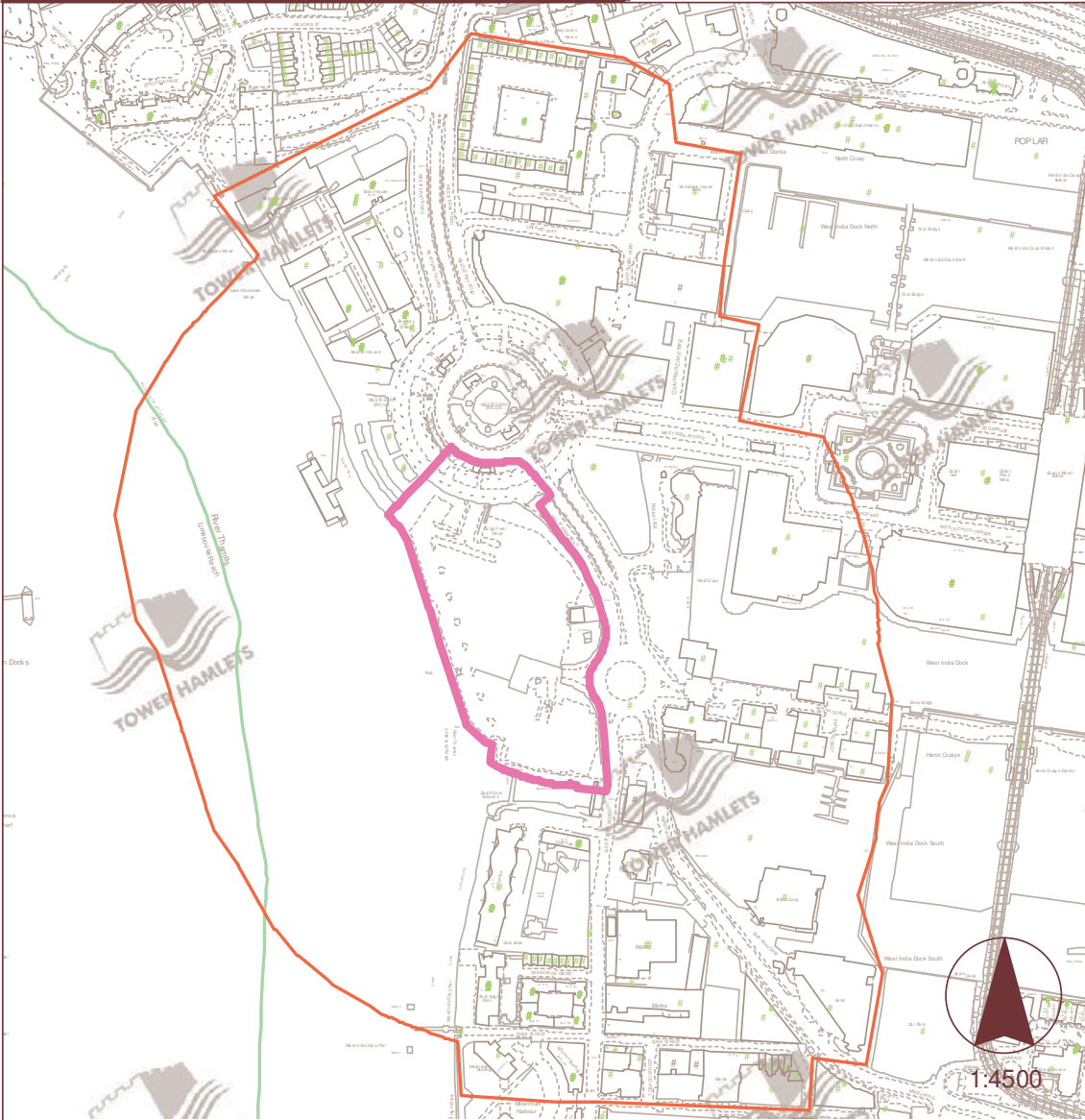
8.95 The ES was considered to provide a thorough assessment of the impacts and meets the requirements of the EIA Regulations. Further clarification was sought on a number of points via a Regulation 19 request. The applicant submitted further information to address these requirements.

8.96 The Environmental Statement has been assessed as satisfactory, with mitigation measures to be implemented through conditions and/ or Section 106 obligations.

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
- # 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

This page is intentionally left blank