

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

APPLICATION DETAILS

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

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

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

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

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

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

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

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

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

LOCAL GOVERNMENT ACT 2000 (Section 97)

LIST OF BACKGROUND PAPERS USED IN THE DRAFTING OF THIS REPORT

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

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

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

Owner: London Development Agency

Historic Building: N/A

Conservation Area: N/A

1. RECOMMENDATION

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

2.0 SUMMARY OF MATERIAL PLANNING CONSIDERATIONS

Introduction

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

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

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

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

3.0 PLANNING CONTEXT & HISTORY

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

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

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

new planning permission to be secured.

3.4 The master plan changes since 2004 are summarised at **Appendix E**.

3.5 The applicants state that masterplan changes have been driven by:

- Opportunities to maximise legacy benefits from Olympic investment;
- Changes to the Olympic venue requirements;
- Sustainability considerations;
- Changing security requirements,;
- Deliverability considerations, and;
- Cost.

3.6 Following approval it is intended that the Olympic, Paralympic and Legacy Transformation Planning Applications (current applications) will supersede the 2004 permission.

3.7 Other relevant permissions include:

- *Planning permission for under grounding the overhead power lines* - Planning permission for the construction of two tunnels and associated infrastructure to enable under grounding of the power lines and thus allow removal of the overhead lines and pylons were granted by the London Borough of Newham on the 6th January 2006(Ref: 05/004/FUL) and Hackney on the 10th January 2006 (Ref: 2005/2524). Works have commenced.
- *Planning permission for rail carriage sidings facility at Lea interchange* - Planning permission for the development of rail carriage sidings and related facilities at the Lea interchange in the LB Waltham Forrest immediately to the north of the Olympic Park was granted on the 3rd August 2006.
- *Planning permission for Stratford City* - a major mixed use development on the former Stratford Rail lands was granted by the LB Newham on the 17th February 2005. This permission provides for access to the Olympic, Paralympic and legacy transformation applications site from the Stratford Regional and International Stations and from Stratford town centre. The remediation of this site and the construction of Stratford international station were previously approved as part of the Channel Tunnel Rail Link works.
- *Planning permission for works to increase the capacity of Stratford Regional Station* - granted by the planning committee of the ODA in November 2006

3.8 *Lower Lea Valley, Olympic and legacy Compulsory Purchase Order*

The London Development Agency (LDA) is responsible for securing the land required for the development of Olympic facilities and their legacy transformation within the application sites. The London Development Agency (Lower Lea Valley Olympic and Legacy) Compulsory Purchase Order (CPO) was made on the 3rd November 2005. This order is to be used by the LDA to acquire land in cases where agreement cannot be reached with landowners. By the end of December 2006 over 90 per cent of land within the application sites has been acquired by the LDA in agreement with landowners.

Olympic Planning Applications Strategy

3.9 There are four phases to the development of the Olympic Park, including:

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

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

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

4.0 THE SITE

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

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

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

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

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

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

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

5. PROPOSAL

The Olympic, Paralympic and Legacy Transformation Planning Applications

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

Main Stadium

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

Basketball Arena – Located within the London Borough of Tower Hamlets

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

Energy Centre – Located within the London Borough of Tower Hamlets

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

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

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

Other Services – Located within the London Borough of Tower Hamlets

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

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

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

6. POLICY FRAMEWORK

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

Unitary Development Plan

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

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

Emerging Local Development Framework

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

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

CP49 Historic Environment
CP50 Important Views

Leaside Area Action Plan

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

Spatial Development Strategy for Greater London (London Plan)

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

Lower Lea Valley Opportunity Area Planning Framework (draft)

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

Government Planning Policy Guidance/Statements

PPS1 Generally Policy and Principles

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

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

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

7. PRINCIPLE STRATEGIC ISSUES

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

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

Introduction

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

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

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

Issue 1: Commitment to Sustainable Regeneration

Explanation:

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

Issues for London Borough of Tower Hamlets:

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

View of the London Borough of Tower Hamlets

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

Legacy

Explanation:

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

Issues for London Borough of Tower Hamlets

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

View of London Borough of Tower Hamlets

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

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

Issue 2: Urban Design & Connectivity

Explanation:

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

Issues for London Borough of Tower Hamlets

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

View of London Borough of Tower Hamlets

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

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

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

The Greenway

Explanation:

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

Issues for London Borough of Tower Hamlets:

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

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

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

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

7.31 View of London Borough of Tower Hamlets

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

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

Explanation:

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

Issues for London Borough of Tower Hamlets

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

View of London Borough of Tower Hamlets

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

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

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

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

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

Open Space

Explanation:

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

Issues for London Borough of Tower Hamlets:

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

View of London Borough of Tower Hamlets:

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

Issue 3: Sustainable Environment

Environmental Impact Assessment

Explanation:

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

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

Issues for London Borough of Tower Hamlets

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

View of London Borough of Tower Hamlets

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

Biodiversity/Ecology

Explanation:

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

Issues for London Borough of Tower Hamlets

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

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

View of London Borough of Tower Hamlets

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

Issue 4: Making the Best Use of Waterways

Explanation:

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

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

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

Issues for London Borough of Tower Hamlets

7.68 Issues include:

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

View of London Borough of Tower Hamlets:

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

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

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

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

Issue 5: Renewable Energy & Sustainable Waste Management

Renewable Energy

Explanation:

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

Issues for London Borough of Tower Hamlets

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

View of London Borough of Tower Hamlets

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

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

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

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

Waste

Explanation:

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

Issues for London Borough of Tower Hamlets

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

View of London Borough of Tower Hamlets

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

Issue 6: Traffic & Transport Considerations

Olympic & Legacy Travel Plan Group

Explanation:

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

Issues for London Borough of Tower Hamlets

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

View of London Borough of Tower Hamlets

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

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

Highway Mitigation Measures

Explanation:

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

Issues for London Borough of Tower Hamlets

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

View of London Borough of Tower Hamlets

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

Revenue Support

Explanation:

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

Issues for London Borough of Tower Hamlets:

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

View of London Borough of Tower Hamlets:

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

LBTH Highways - The Existing Situation

Explanation:

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

Issues for/ View of London Borough of Tower Hamlets

7.96 *Existing Highway Network*

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

7.97 *Existing Junctions*

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

7.98 *Existing Rail network*

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

stations are within easy walking distance of the application boundary.

7.99 *Existing Coach Services*

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

7.100 *Existing Walk And Cycle*

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

Site Enabling & Construction

Issues for/ View of London Borough of Tower Hamlets

7.101 *Site Enabling*

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

7.102 *Highways impacts*

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

7.103 *Construction Traffic*

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

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

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

7.104 *Workforce Travel*

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

7.105 *Highways Measures*

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

7.106 *Public Transport*

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

7.107 *Walking & Cycling Measures Envisaged*

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

London 2012 Olympic and Paralympic Games

Issues for/ View of the London Borough of Tower Hamlets

7.108 *The Olympic Route Network*

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

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

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

7.110 *Junctions*

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

7.111 *Highway Measures Envisaged*

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

7.112 *Coach Transport*

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

7.113 *Water Transport*

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

7.114 *Public Transport*

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

7.115 *Walking and Cycling*

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

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

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

Olympic and Legacy Facilities Transformation

Explanation:

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

Issues for/ View of London Borough of Tower Hamlets

7.117 *Highways*

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

7.118 *Legacy Venue Demands*

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

7.119 *Legacy Venue Car Parking*

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

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

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

7.120 *Legacy Venue Coach Parking*

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

7.121 *End of Games*

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

7.122 *Road Hierarchy*

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

7.123 *Highway Measures Envisaged*

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

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

7.124 *Parking and Loading Measures*

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

7.125 *Legacy Parking Standards*

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

7.126 *Public Transport/Walking and Cycling*

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

Olympic and Legacy Facilities Operational (2021)

Issues for/ View of London Borough of Tower Hamlets

7.127 *Highways*

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

7.128 *Assessment of Cumulative Highway Effects*

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

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

7.129 *Junction Impacts*

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

7.130 *Cumulative Highway Measures Envisaged*

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

7.131 *Parking and Loading*

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

7.132 *Public Transport Assessment*

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

7.133 *Walk and Cycling Measures Envisaged*

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

necessary for Legacy walking and cycling.

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

Travel Plan Framework

Issues for/ View of London Borough of Tower Hamlets

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

Issue 7: Other

Retail, Leisure & Sport

Explanation:

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

Issues for London Borough of Tower Hamlets

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

View of London Borough of Tower Hamlets

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

Code of Construction Practice

Explanation:

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

Issues for London Borough of Tower Hamlets

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

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

View of London Borough of Tower Hamlets

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

8.0 CONCLUSIONS

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