

## Development & Renewal

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

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19 March 2007

Dear Vivienne,

### TOWN AND COUNTRY PLANNING ACT 1990

### TOWN AND COUNTRY PLANNING (GENERAL DEVELOPMENT PROCEDURE) ORDER 1995

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

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

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

#### Overall summary of views

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



2006 - 2007  
Early Intervention  
(Children at Risk)

2003 - 2006  
Winner of 4 previous  
Beacon Awards



INVESTOR IN PEOPLE



Corporate Director  
Development and Renewal  
Emma Peters

- It is recommended that further work be carried out on the design and layout of the site for legacy purposes in order to ensure that these communities are appropriately designed to achieve the long term sustainable regeneration of the area. This would involve the establishment of linkages with the surrounding area and the availability of these linkages in perpetuity. The retention of the Olympic park loop road in the legacy proposals is strongly questioned.
- Currently river, road and rail networks isolate the site. The lack of connectivity and safety concerns with the existing links is required to be addressed through improvements, including new bridges. The proposed bridges from the park to other parts of Fish Island and Bow are temporary with no firm commitment within the application to make them permanent beyond the lifetime of the games. Without firm commitment for improved links, Tower Hamlets residents would be isolated from the facilities within the Olympic Park and at Stratford City.
- The proposals contain inadequate analysis of the optimum position for new bridges located within or landing in Tower Hamlets in legacy phase. Accordingly, their position and number within the application should be seen as illustrative, until that analysis is carried out. Such analysis should look at the planned changes outside of the site, as well as the requirements of the development itself, so that the aims of proper connectivity and place making are delivered successfully.
- The design of the land bridge type connection back from the Greenway to the northwest of the railway line linking Tower Hamlets with the Olympic Park and Stratford Town Centre is unacceptable. Despite the construction of a major land bridge, uninterrupted pedestrian and cycle traffic along the entire Greenway will not be achieved. In order to provide the most benefit for pedestrians and cyclists accessing the Greenway from the western (Tower Hamlets) end, a solution should be designed that allows direct access to the land bridge on both the northwest and the southeast side of the railway.
- The CCHP building and the adjacent sub-station are substantial buildings located in prominent positions within the Olympic Park close to Victoria Park. The highest quality of design and architectural treatment will be required to ensure that these buildings contribute positively to the area. It is perhaps telling that the visualisations of the Park that have been produced do not include this building, and in particular the flue stack.
- The level of public open space within the development has reduced significantly since the last application. The previous scheme represented an acceptable balance between loss of Metropolitan Open Land, acceptable replacement and additional provision for the large new communities that were proposed. The current application does not contain that balance and results in an overall loss of MOL and accessible open space.
- The proposals result in the loss of active allotments and no acceptable replacement site has been secured in the context of the proposals. This adds to the loss of "green" amenities that residents of the surrounding areas will suffer over the course of many years and possibly in perpetuity.
- Public access to the canal environment will be important in legacy and the proposals do not make it sufficiently clear how this will be provided and secured.
- The development has secured the removal of power lines and their associated pylons from this part of the Lea Valley; which is welcomed. However, the application proposed a network of 35-

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

- Generally, it is felt that the renewables and CO2 emission reduction targets should be raised higher than 20%. This is to reflect future targets of Zero Carbon developments. Given that the timeframe for the application goes beyond 2014, the likelihood of more stringent legislation is very high. Raising the targets would also send a clear message to all stakeholders and interested parties that the ODA is serious about making these Games the most sustainable in history.
- Guarantees should be sought to ensure that the design and proposed operation (i.e. traffic, hours of operation and noise emissions) of the Energy Centre respect the future residential/ community focus of this part of Fish Island. In particular a clear commitment should be given to service the Energy Centre by water as far as is practicable.
- Appropriate conditions and Section 106 (or other relevant legal agreement) package must be established to ensure that the various mitigation of harm/compensation for loss measures and commitment to the delivery of facilities and infrastructure during the games and in legacy are secured.

### **Further Details of Urban Design Concerns**

The lack of any clear analysis of how the area should function in 2012+ in urban design terms is a fundamental weakness in these applications. To say that these details will follow in Legacy Communities is just not acceptable. If these planning permissions are granted in the form that they have been made, planning permission will exist for a network of roads and bridges that have been largely chosen because they suit the running of the Olympics from this location and not because they provide the necessary highway and servicing infrastructure skeleton to support the future development of these areas. Whilst the provision of a loop road is necessary for the functioning of the Olympics, to show its virtual complete retention in Olympic Legacy in these applications is completely unacceptable.

Addressing these fundamental shortcomings in the application will be challenging and difficult at this late stage. The only practical way to address this issue is for the application to be amended so that the legacy elements are reduced to being illustrative at this stage, and they can then be submitted in detail following a proper urban design analysis of the legacy provision.

The provision of the Olympics legacy framework of roads and bridges should be controlled through a Grampian condition linked to the first use of any of the retained facilities, such as the retained stadia, aquatics centre, media centre and the athletes' village. The pre-commencement elements in the Grampian need to be significant in order to give a proper level of control over the delivery of the connectivity infrastructure. This would mean that the post-Olympics alteration of any permanent facility could not take place until the legacy proposals have been submitted and approved. The facility could not be first used, post-Olympics until the approved legacy infrastructure proposals have been provided.

Given that regeneration and a positive legacy are primary aims of the 2012 Games the lack of commitment and the potential negative legacy are major concerns. These concerns must be addressed by:

- Producing a rigorous urban design analysis of the form the legacy communities development should take in order to provide well connected and sustainable communities and then demonstrating how the Olympics phase either provides that platform or if it cannot, how that platform will be provided in Olympic Legacy.
- A proper analysis of the best location for and optimum number of bridges needed to integrate properly the new communities to existing areas; many of which will be undergoing significant change.
- The construction of the permanent bridges is mandatory and cannot be withdrawn at a later stage. Planning permission for temporary structures should only be given on the condition that these are replaced with permanent structures after the Games.
- At no point will the established connection between the Olympic Park and the rest of Tower Hamlets be severed. Construction of permanent bridges should be scheduled so that there is always one of the two bridges available at all times.
- Revising the application to reflect the land use designations in the Leaside Area Action Plan and LLV OAPF.
- Ensuring bridges to Tower Hamlets are built as permanent features that improve connectivity between the Olympic Park and Fish Island.
- Either alter the location of the inner ring road or ensure that it is a temporary feature that is removed as part of the deconstruction process.

### **Regulation 19 Issues**

I refer to the Environmental Statement (ES) submitted with the planning application. I write to advise you that it is considered that further information is required in accordance with Regulation 19 of the Town and Country Planning (Environmental Impact Assessment) Regulations (1999). In summary, further information is required as follows:

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

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

As you are aware, the Regulation 19 information will be required to be readvertised, in accordance with the EIA Regulations.

### **Other ES Clarification Issues**

#### Open Space

- Guarantees should be sought that these areas designated as legacy communities will include sufficient open space to meet the standards set by the London Plan. The current proposals represent a significant reduction in the amount of open space proposed in the previous scheme, which is not acceptable.
- The Legacy Master Plan should not only address the connectivity of green space and open space within the Area, but also links with green and open spaces outside of the boundary, especially Victoria Park to the west. Further work needs to be undertaken with regard to ownership, management and maintenance of the legacy park. This should be conditioned by the ODA.
- Greater clarity and precision about access to canals is needed. It is vital that the fullest public access to canal towpaths, locks etc is secured as a result of these developments.

#### Biodiversity/ Ecology

- In principle, the proposed works to the river walls are acceptable, however due to some species and habitat, sensitivity appropriate mitigation measures need to be conditioned to ensure that minimum disruption is caused.
- The decontamination of the waterways is welcomed and should lead to an overall enhancement of the rivers and canals within the site. It is in the ODA's interest that potential offsite pollution sources are identified and an assessment is made on how these can be eliminated or at least mitigated against.

#### Making the Best Use of Waterways

- It is important to relate water freight access to places where future employment and industry will be located and to road access to allow for intermodal transfer, particularly for waste and

recyclates. A number of piers and wharves should be designed and located throughout the site to provide connections to the construction sites for water freight.

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

#### Waste

- Waste has not been addressed beyond construction. It should be condition that a Waste Management Plan is produced for the Phase during the Olympic and Paralympic Games, with the aim of reducing the amount of waste produced during the Games and of reusing and recycling.

#### Olympic and Legacy Travel Plan

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

#### Transport

- It is recommended that the London Plan parking standards be applied, this is especially important in the legacy proposals given that there is an excessive amount of parking proposed, the public transport accessibility of the area would be 'excellent'. The legacy would be implemented some 5 – 10 years from now where it is expected that use of private vehicles would be significantly lower.
- More generous cycle parking should be provided in line with London Plan cycle parking policies both during the Olympics and legacy.
- Insufficient detail has been provided in order to assess the impacts of construction traffic (particularly deliveries to the site) as the vehicle entry and exit points have not been identified.
- In general, further work needs to be carried out with regard to the impact of construction traffic and long term highway implications, i.e. during the Olympics and legacy on both Strategic Roads and the London Borough of Tower Hamlets road network.

#### Retail, Leisure and Sport

An appropriate strategy should be developed to ensure that sporting facilities provided in legacy reflect the need of local communities and wider London residents and that the funding mechanisms are in place to secure these facilities for long term community use.

#### Code of Construction Practise

✓ The London Borough of Tower Hamlets would expect full compliance with the Council's Code of Construction Code of Practise.

For a complete commentary of the London Borough of Tower Hamlets, issues and views please refer to the attached report presented to the Strategic Development Committee on the 15th March 2007 and subsequent minutes of the meeting.

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

Yours sincerely

A handwritten signature in black ink, appearing to read 'Michael Kiely', with a long horizontal line extending from the end of the signature.

**Michael Kiely**  
Head of Development Decisions