

Land off Angel Lane, Stratford

in the London Borough of Newham (London Legacy Development Corporation)

planning application no. 19/00097/FUL

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Development of a multi-use entertainment and leisure building with an illuminated external display (96.5 metres) and external podium and terraces with landscaping (sui generis use including: entertainment, assembly and leisure venue; music venue/nightclub; restaurant/members' lounge/nightclub; bars, restaurants, cafés and retail; storage, vehicle parking, servicing and loading; external podium and terraces for entertainment, assembly and leisure use, café, bar and retail facilities; together with all supporting and complementary uses), and the construction of new pedestrian and vehicular bridges, highway and access works, servicing, open space, hard and soft landscaping, demolition of existing structures, associated infrastructure, plant, utilities.

The applicant

The applicant is **Stratford Garden Development Limited** and the architect is **Populous**.

Strategic issues

Land use principle: Whilst the proposed land uses are broadly supported and the possible contributions towards London's culture and creative industries and night time economy are acknowledged, the issues detailed within this report must be fully resolved before an entertainment venue of this scale and in this location, can be supported in strategic planning terms (paragraphs 26-31).

Public safety, security and event management: The capacity of the proposed development, number of event days and event timings raise significant concern in terms of crowd management, public transport capacity and public safety. The concerns raised by GLA officers must be fully resolved prior to Stage 2 referral (paragraphs 32-39).

Transport: The proposals raise a number of very significant transport concerns, in particular in relation to assessment and modelling assumptions at Stratford Regional station, highways and public transport network capacity, pedestrian flows and movements to and from the site, relationships with other major events and, overall, the impact on all users at this crucial multi-modal strategic interchange. These must be fully resolved before the application is referred to the Mayor at Stage 2 (paragraphs 40-66).

Urban design: The public realm and routes through the site should remain open, free to use and offer the highest level of public access and restrictions should be limited to exceptional circumstances for example when essential for maintenance and emergency access.

The impacts of the proposed external LED cladding require further assessment to demonstrate that the scheme's impact on surrounding residential properties, the setting of heritage assets and short and long-range views would be acceptable. Furthermore, the intention to display illuminated advertisements at the scale proposed in this location raises significant concerns and could have extensive environmental, visual and amenity impacts which will need to be fully assessed (paragraphs 67-81).

Residential amenity: In line with draft London Plan Policy D12, the proposal must ensure that surrounding residential amenity is not compromised. Appropriate mitigation measures must be secured to control the impacts of noise, vibrations and light pollution, including solar glare (paragraphs 82-87).

Issues relating to **inclusive design** (paragraphs 88-90) and **sustainable development** (paragraphs 91-99) must also be addressed.

Recommendation

That the London Legacy Development Corporation (the Corporation) be advised that the application does not comply with the London Plan and draft London Plan for the reasons set out in paragraph 103 of this report.

Context

1 On 16 April 2019 the Mayor of London received documents from the London Legacy Development Corporation (LLDC) notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 ('the Order 2008') the Mayor has to provide the Corporation with a statement setting out whether he considers that the application complies with the London Plan and draft London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under the following Categories of the Schedule to the Order 2008:

- Category 1B: *"Development with a total floorspace of more than 15,000 sq.m."*
- Category 1C: *"Development which comprises or includes the erection of a building more than 30 metres high outside the City of London."*

3 Once the Corporation has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal or allow the Corporation to determine it.

4 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The proposed development relates to a 2.98 hectare triangular parcel of land, within the London Borough of Newham and within the planning authority area of the London Legacy Development Corporation (the Corporation). As shown in image 1, the development site boundary includes development over the UKPN substation, air rights over the HS1 access road and the new bridges.

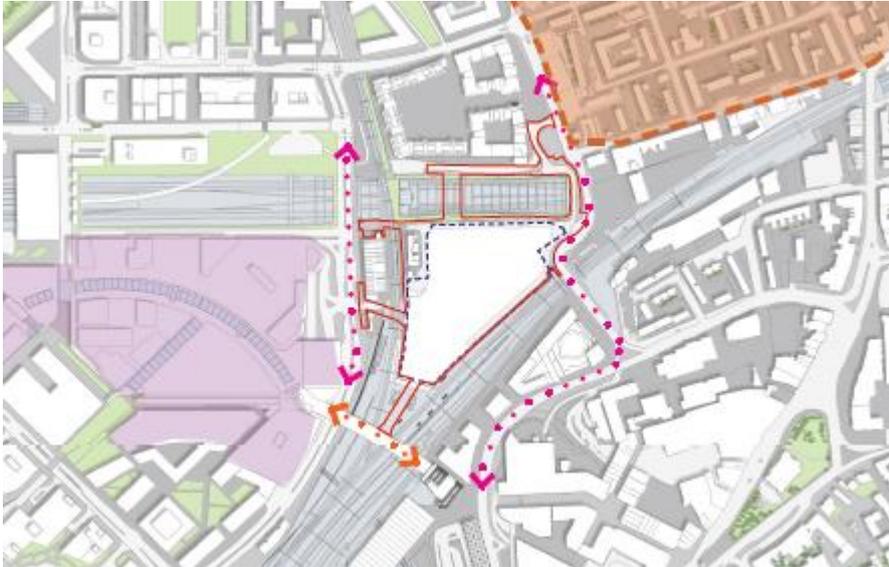


Image 1: Proposed site area (shown in red) within the surrounding context

6 The site is currently vacant, comprising hardstanding, and was last used as a temporary coach park during the 2012 Olympic and Paralympic Games. Stratford Garden Development Limited is in ownership of the site.

7 The site is triangular and bound by railway lines running to the east and west, and by the subterranean High Speed 1 (HS1) rail box to the north. Beyond the HS1 railway lines to the north is a residential development known as 'Chobham Farm'. The eastern boundary adjoins Angel Lane for vehicular access and the Great Eastern Main Line and Central line railway corridor. Beyond the railway corridor to the east are developments comprising student housing, residential, hotel and commercial (office) uses. To the west, the site is bound by railway corridor between Stratford and Tottenham Hale, an energy centre, Montfichet Road and the Westfield Shopping Centre. The wider area includes the Queen Elizabeth Olympic Park and the London (Olympic) Stadium.

8 The application site lies within the Lower Lea Valley (LLV) Opportunity Area and the area covered by the Mayor's Olympic Legacy Supplementary Planning Guidance (OLSPG). The site also sits within the Stratford Metropolitan Town Centre, which is identified as a future potential International Centre within the draft London Plan. The site is recognised by the LLDC as an area of regeneration and is formally allocated within the LLDC Local Plan 2015 (Site Allocation SA3.1) for a large-scale town centre use with supporting elements.

9 In transport terms, Stratford Regional station is located adjacent to the south west of the site and provides access to London Underground services on the Jubilee and Central lines, two branches of the DLR, London Overground, TfL Rail and National Rail services. Stratford International station is located 500 metres to the west of site and provides access to High Speed domestic National Rail services and DLR. Maryland station is located 550 metres to the east of the site and also provides access to TfL Rail. There are two bus stations at Stratford Town Centre and Stratford City, with numerous bus routes, as well as scheduled coach services and two taxi ranks. The eastern boundary of the site connects to Angel Lane, which forms part of the Strategic Road Network (SRN) with the

nearest section of the Transport for London Road Network (TLRN) being the A12, which can be accessed approximately 2 kilometres to the west and north of the site. The site records the highest public transport accessibility level (PTAL) of 6b, on a scale of 0-6b.

10 The site is not located in a Conservation Area and contains no listed buildings. The nearest heritage asset is the Saint John’s Conservation Area, which includes the Grade II Listed Saint John’s Church. The conservation area is located approximately 300 metres to the south-east of the site.

Details of the proposal

11 The proposed development comprises a spherical shaped multi-use entertainment venue, with associated ancillary uses within a multi-layered podium and comprises the following main elements:

Proposed Use	GIA (sq.m.)	Podium / sphere	Approximate capacity (maximum)
Main events	47,654 sq.m.	sphere	21,500 (seated & standing)
Restaurant / members lounge / night club	2,406 sq.m.	sphere	450 – seated layout 1,000 – standing layout
Music club	2,200 sq.m.	Podium	1,500
Plaza commercial	1,099 sq.m.	Sphere	
Back of house	3,234 sq.m.	Sphere	
Cafes (including pop-ups)	385 sq.m.	podium	

12 The Sphere would be 120 metres wide and 96.5 metres high. Externally it would be clad in triangular LED panels which would display a range of static and moving images, including advertisement, digital art and content related to the events within the arena. When the LED’s are not active, the sphere would appear black. It is proposed to zone the façade to utilise differing light intensities to control light spread and pollution to surrounding properties.

13 It would sit on a multi-layered podium (levels 0-3) that would fill the site and a concourse level would be located at level 1, with back of house activities at level 0 below. Podium level 2 would be the main arrival level and fills the entirety of the site. Upper podium level (level 3) would partially cover the site and contain areas of public realm and entrances to the main arena.

14 The applicant would build three pedestrian bridges to provide access to the development. Proposed bridges 1 and 2 would adjoin the eastern side of Montfichet Road, to the west. The third bridge would be located at the southern end of the site and would adjoin the established town centre link bridge. An additional pedestrian and vehicular surface level access point would be established from Angel Lane to the north-east of the site. Another vehicular only bridge would be located at the northern end of the site across HS1 box, towards the revised access road also connecting to Angel Lane.

15 The applicant proposes that the Sphere would operate up to 365 days per year, with approximately 300 ‘event days’ (events within the main arena) per year, including (but not limited to) concerts, immersive experiences, product launches, corporate events and sporting events.

16 The following event timings are proposed for the main arena:

Event Type	Indicative Doors Opening Time	Indicative Event Start Time	Indicative Event Finish Time
Matinee event (Monday-Sunday)	11:00-14:00	12:00-15:00	15:00-18:00
Evening Event (Monday-Thursday)	18:00-19:30	20:00-21:00	23:00-00:00
Evening Event (Friday-Saturday)	18:00-19:30	20:00-21:00	23:00-00:15
Evening Event (Sunday)	18:00-19:30	20:00	22:30-23:30
Overnight Event (Monday- Sunday)	18:00-19:30	20:00-21:00	00:30-05:00

17 The overall site capacity would be 25,000 people, which includes the maximum capacity of the main venue 21,500 (standing and seated). The applicant has confirmed that when the main arena is operating at full capacity, the capacity of the ancillary spaces would be limited to 2,500 people. Approximately 1,000 members of staff would be required for full capacity events.

18 A separate application to display advertisements has been submitted to the LLDC which is not referable (ref: 19/00098/ADV) and seeks permission for the display of advertisements on the external surface of Sphere and at other locations within the site. Whilst the content of the advertisement is not a strategic planning issue, the visual impact of the external appearance of the sphere has been considered within this report.

Case history

19 A pre-planning application meeting was held in August 2018, with written advice issued on 29 August 2018. In summary, the proposed use was supported in principle, however the applicant was advised that further detailed information was required on public safety and event management, public access and public realm, inclusive design and transport – in particular the scheme’s impact on public transport and impacts on Stratford Regional station. Given the scale and setting of the development, the applicant was also asked to produce key views to demonstrate the impact of its proposal, especially during illumination and that full details of materials, including illuminance zones and periods of illuminance would be required..

20 A follow-up pre-planning meeting was held on 3 October 2018, which focused on the proposed energy strategy, however no written response was issued.

21 During pre-planning discussions, the applicant was also encouraged to continue to engage with the LLDC, TfL and the London Borough of Newham on the matters GLA officers raised. Throughout the pre-planning process TfL raised significant concerns, including in relation to the assumptions made in the transport assessment and a number of specific methodological issues were set out in a separate letter sent to the applicant on 12 February 2019 recommending that they be addressed ahead of any submission.

Strategic planning issues and relevant policies and guidance

22 The relevant issues and corresponding policies and guidance are as follows:

- Land use principle *London Plan; Culture & Night Time Economy SPG;*
- Community infrastructure *London Plan;*
- Culture *London Plan;*
- Night time economy *London Plan;*
- Entertainment facilities *London Plan;*
- Urban design *London Plan; Character & Context SPG;*
- Inclusive access *London Plan; Accessible London SPG;*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; London Environment Strategy;*
- Transport and parking *London Plan; the Mayor's Transport Strategy.*

23 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Legacy Development Corporation Local Plan (2015) and the London Plan (Consolidated with Alterations since 2011).

24 The revised National Planning Policy Framework (February 2019), National Planning Practice Guidance and draft London Plan (consultation draft, December 2017 incorporating early suggested changes), and the Mayor's Olympic Legacy Supplementary Planning Guidance (OLSPG, 2012) are also relevant material considerations.

25 It is noted that the LLDC is in the process of reviewing its Local Plan and implementing a new Night Time Economy SPD. A draft version of the local plan was consulted on between November 2017 and June 2018. The draft revised Local Plan is expected to be adopted in 2019.

Principle of development

Policy context and land use

26 The application site lies within Lower Lea Valley (LLV) Opportunity Area and the area covered by the Mayor's Olympic Legacy Supplementary Planning Guidance (OLSPG). The OLSPG sets out an overall vision for the area, which includes making it one of the best places to live and work in London, improving connectivity across and into the new Queen Elizabeth Olympic Park, and creating new family housing and schools.

27 The site also sits within Stratford Town Centre. The London Plan Policy 2.15, and Annex Two (Table A2.1) designate the centre as a Metropolitan Town Centre and in line with London Plan Policy 2.15 and draft London Plan Policies SD6 and SD7, development in such centres should sustain and enhance the vitality and viability of the town centre function, accommodate economic and housing growth through intensification and contribute to an enhanced environment. Retail, commercial, arts, cultural and leisure development should be focussed on sites within town centres and related to the size, role and function of a town centre and its catchment in line with London Plan Policy 4.7.

28 At a local level, the application site is located within Sub Area 3: Central Stratford and Southern Queen Elizabeth Olympic Park which supports a diverse range of education and sporting facilities, retail, leisure and business expansion with high quality housing. The site is also identified as allocated site SA3.1 'Stratford Town Centre West' which states that the eastern parcel of the allocated site (the application site) is identified for a large-scale town centre use with supporting elements.

29 In land use terms, the London Plan and draft London Plan give broad support to the development of new cultural and entertainment venues in town centres. The flexibility of the arena, in terms of design and mode (seating and standing) would help to maximise the multiple use of the facility and would deliver spaces that would be suitable and attractive to a range of cultural uses. The proposed smaller music venue (music club) would operate as a nightclub or as a smaller venue with a maximum capacity of 1,500 and the applicant should explore opportunities to support local and grassroots music and performing arts within the proposed cultural offer and surrounding area with strategic stakeholders, including the Mayor's Culture Team and Newham culture officers, as well as relevant sector representatives such as the Music Venue Trust. Further details regarding the proposed operating profile of the smaller music venue should be provided.

30 In addition to the entertainment arena, the proposal would incorporate approximately 3,890 sq.m. of ancillary commercial floorspace, in the form of retail, cafes, restaurants and bars. These uses are appropriate for the site's town centre location and would support London's night time economy, in accordance with the Mayor's 24-hour vision for London and draft London Plan Policy HC6. The acceptability of the proposed night time uses are however subject to safe and convenient night-time transport and resolving all public safety concerns. The proposal would also contribute to London's visitor economy and help further promote Stratford and the wider Queen Elizabeth Olympic Park as an international destination.

31 In principle, the use of the application site for a major leisure use is supported and the ancillary commercial uses are appropriate for the site's town centre location and would deliver economic benefits and employment opportunities. The main event space and smaller music venue are welcomed in terms of their potential contribution towards London's culture and creative industries and night time economy, however, the issues detailed within this report must be fully resolved before the scale and concept of the venue could be supported in strategic planning terms.

Public safety, security and event management

32 The proposed development is envisaged operating up to 365 days a year, with approximately 300 event days within the main arena, which could be used for several events a day. The maximum proposed capacity of the development is 25,000 people, however the applicant considers this would only occur in rare circumstances, with average attendance at the main venue expected to range between 6,000-17,500 people, depending on the event type. The timing of events would generally follow 11:00-18:00 for matinee events, 18:00-00:00 for Monday to Thursday events, 18:00-00:15 for Friday and Saturday evening events, and 18:00-23:30 for Sunday evening events. Other late night/early morning finishing events are also proposed.

33 In line with London Plan Policy 7.2 and draft London Plan Policies D1, D3, D8, D10 and D11, the proposal must achieve a safe and secure environment for all its users and incorporate safe emergency evacuation. As discussed during pre-application discussions, the proposed capacities and event timings raise strong concerns in terms of crowd control and public safety. This is of further concern given the high-density nature of the surrounding area, site constraints which require bridge access, and capacity issues associated with Stratford Regional station.

34 The following documents have been submitted in support of the proposal:

- CONOPS (concept of operations): identifying the public, crowd management and local transport management considerations relating to event and non-event days. This document will inform the Venue Operations Manual (VOM);
- Security Strategy: an assessment of the threats to the proposed development and mitigation measures.

- Fire Safety principles have been detailed within a chapter of the Design and Access Statement.

35 The proposal to operate 365 days a year including up to 300 event days raises concern in terms of potential adverse impacts on surrounding residential amenity, the capacity of the pedestrian access routes and pedestrian amenity, the transport network (particularly Stratford Regional station egress/ingress and internal circulation, public transport network capacity and local highway capacity including bus, coach and taxi), and the ability to coordinate event days with surrounding venues. Whilst the supporting documents refer to event days as ‘special events’, GLA officers question this description given their regular occurrence and consider the number of special event days may need to be reduced to address amenity and public safety concerns. The number of maximum capacity events should also be agreed, given the significant pressure these will place on surrounding infrastructure. Overall, further information is required to demonstrate how the capacity of the site will be monitored, controlled, managed and capped and event timings must be aligned with public transport capacity (particularly for the late evening and early morning finishes), egress times and crowd management arrangements.

36 The submitted CONOPS indicates that London Stadium crowds would prevent major event crowds arriving or departing at the Sphere during stadium events. The applicant considers that these conflicts could be resolved through crowd management measures and a commitment to work with the London Stadium. GLA and TfL officers express significant concern regarding these findings and do not consider the proposed mitigation measures are appropriate. Overall, further consideration is required to demonstrate, to the satisfaction of GLA and TfL officers, that the proposed development could operate safely in conjunction with the London Stadium. The applicant should also consider how its proposed event days would operate in conjunction with other events and activities in the wider area, including Westfield and The Queen Elizabeth Olympic Park. As discussed further in the transport section of this report, consideration of potential conflict with events at the O2 Arena is also required.

37 Access and egress to the site would rely predominantly on the proposed pedestrian bridges. Whilst the principle of this approach is supported as it has the potential to improving connectivity across the wider area, the implications for crowd control and emergency evacuation must be robustly tested. Two of the bridges (Bridge 1 and 2) would land on Montfichet Road, providing access to Stratford station Northern Ticket Hall entrance, Stratford International station and the Stratford City bus, taxi and coach facilities. Given the anticipated volume of pedestrians along this route (approximately 50% of all visitors), it is proposed to re-design Montfichet Road to reduce the number of vehicle lanes and increase the capacity and provision for pedestrians and cyclists. The applicant must demonstrate that the pedestrian bridges and width of pavement along Montfichet Road would be sufficiently to accommodate the safe movement of pedestrians and enable acceptable egress times, including during full capacity events, without the need to use or impact the functioning road, and to ensure the design does not preclude bus, coach and taxi uses at all times. Transitional spaces to manage crowd flows to and from Stratford Regional station and other transport facilities must also be identified and supported by information and wayfinding (both permanent and temporary).

38 As discussed further in the transport section below, the proposed capacity and event times must also be reviewed in terms of station capacity especially at Stratford Regional station, network capacity and local highway and public realm impacts. The applicant must also demonstrate how the safe dispersal of crowds can occur in the event of overcrowding at stations along with adequate and appropriate resilience planning.

39 Overall, GLA and TfL officers are currently not satisfied that the proposal could operate in a safe and acceptable manner in accordance with London Plan Policy 7.2 and draft London Plan Policies D1, D3, D8, D10 and D11. The concerns outlined above must be fully resolved before the proposed quantum of development, crowd capacities and event timings and frequency can be supported at a strategic level. The principles of the proposed operation and event management strategy must also be agreed with the Corporation, the London Borough of Newham, TfL, Network Rail, Transport operators and other relevant bodies before the application is referred to the Mayor at Stage 2.

Transport

40 London Plan Policy 6.1 and Policy T1 of the draft London Plan require development to support improved public transport capacity and confirms a strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated. London Plan Policy 6.3 and Policy T4 of the draft London Plan require that impacts of development are fully assessed and mitigated.

41 The proposed development requires further significant analysis and discussion between TfL, Network Rail, Crossrail, transport operators, the LLDC, London Borough of Newham and the applicant and a range of strategic and detailed TfL issues must be addressed including omissions, assumptions, methodology and clarifications, particularly in the submitted Transport Assessment, full details of which will be provided separately to the LLDC. TfL notes that previously raised significant methodological concerns have still not been addressed, which will have an important bearing on likely impacts and hence the acceptability of the proposals.

42 Furthermore, the submitted Transport Assessment does not include detailed consideration of the adverse effects of the proposals on other travellers in the local area, nor sufficient comparisons of 'with' and 'without' development. A range of scenarios and other event times and event coincidences must therefore be assessed along with a clear explanation of mode shares, origins and destinations and line distribution. The range of uses and combinations of afternoon and evening events and evening events causes a range of significant concerns given existing PM peak network crowding and PM peak congestion at Stratford Regional station.

43 The applicant's assessment assumes that the impacts of the development proposal on station congestion are treated as 'special events', thereby avoiding and reducing requirements and potential mitigations. However, 300 event days per year is considered to be a regular occurrence and should therefore be regarded as 'normal operation', with station capacity, design and management requirements reflecting this situation.

Rail network arrival and departures

44 The event arrival profiles for evening events appear compressed and fall later in the weekday PM peak than would be expected. There is concern that this seeks to downplay likely impacts. For example, given the range of other attractions at Stratford, the Sphere's arrival profile is expected to overlap with the PM peak to a greater extent, which would have a more significant impact on the PM peak periods than presented.

45 The assumptions for event departures, egress times, and station entry and clearance times are also over optimistic. Based on 78% of users using Stratford Regional station and the desired finish times and clearance times, this requires the station to absorb 775 entries per minute, on top of other background use. This flow rate is higher than is currently achievable for an event at the London Stadium; and moreover, this assumption exceeds the current physical capacity of the station. Furthermore, it does not take account of network capacity and frequency. A more realistic assumption would have potentially significant implications on the relationship between event capacities, finish times and local area clearance times.

46 The assumptions for event departures and late evening network capacity are over optimistic as Stratford does not currently have the late evening/early morning rail based public transport capacity to clear significant event sizes and onward interchange and connections beyond Stratford raise additional concerns given the proposed finish times and expected queuing clearance. Whilst it is acknowledged that Stratford benefits from the night tube at weekends, the existing low frequency of the service would not be able to accommodate significant concentrated pulses of passengers.

47 The applicant must consider the availability of alternative routes and journey times to central London National Rail terminals and other major interchanges for late evening/early morning onward connections to final destinations, especially where no night tube or other rail-based services operate.

Rail network and station impacts and mitigation

48 The applicant's assumptions for pedestrian flows through the station require significant additional further work and further discussions are required with TfL, Network Rail and train operators in this respect, and will require significant investment and network and station management arrangements in order for the station to operate under acceptable conditions and anticipated levels of crowding, and it is likely to be only possible to mitigate these impacts through measures including station capacity/congestion improvements; line capacity; and operational, staffing and management measures as restricting the number and timing of events.

49 TfL/Network Rail/Crossrail and rail stakeholders are investigating options for integrated congestion relief schemes across Stratford Regional station, including new entrances and interventions to divert passenger flows from pinch points at entrances, subways and staircases to achieve a design target of an acceptable level of crowding which will be required by the mid-2020s. Additional trips generated by this application scheme and others proposed in and around Stratford will have significant impacts on capacity across the station on staircases, escalators, lifts, platforms and gate-lines as well as the associated risks of worsening delay and passengers' journey experience.

50 It is therefore considered that an appropriate significant contribution related to the transport impact of the trips generated from this site will be required towards congestion relief schemes, and internal wayfinding and signage and/or other measures to ensure safety which would enable the delivery of interventions prior to first occupation of the site or other suitable triggers to be agreed. TfL, Network Rail, Crossrail, railway operators, LLDC, London Borough of Newham and other stakeholders engaged in the Stratford station governance group will work to investigate the phased delivery of necessary interventions.

51 The effect of 300+ event days for additional PM peak network capacity and in particular late evening finishes could conceivably be mitigated by enhancing the capacity of frequencies or services to become normal operation, which may be an expectation of the applicant or visitors to the proposed development. However, the scope for enhanced late evening frequencies and capacity may be limited as it needs to be balanced with the network wide needs for a comprehensive programme of train maintenance, depot capacity and access, and overnight maintenance and engineering requirements. It is also dependent on driver availability and station staffing across the network. In the event that additional capacity could be delivered on rail (or bus) networks this would require significant contributions by the applicant to address the above to mitigate the impacts of the development. Engagement with TfL, Network Rail, train operators and other transport providers will be required to investigate this further in terms of scheduling and procuring any additional transport services or enhanced capacity as part of a regular timetabled service change, where feasible to mitigate the proposed number of events and coincidences.

52 Besides the infrastructure and any service interventions, the additional significant trips will give rise to increased requirement for station staffing to allow Stratford station to operate safely and to deliver on passenger journey experience and time. TfL and rail stakeholders consider that an increase in the station staff resource is required as a result of this development to mitigate the impact of increased patronage especially given that many visitors to the development will be national visitors unfamiliar with the station, alongside the need to manage the impact and disruption to other background users of the station. The required mitigation will need to be calculated by TfL, Network Rail and rail operators in discussion with the LLDC and then agreed with the applicant. It must be secured in an appropriate legal agreement. Any necessary staff outside the station for events and otherwise will be for the applicant to provide as appropriate in line with other event management procedures (addressed above).

53 Other station and network capacity interventions and station staffing may be required at Maryland and Stratford International stations, in particular for event coincidences. They may also be required at further local stations such as Hackney Wick, Stratford High Street and Pudding Mill Lane as well as further afield as services calling at other stations may be full on departure from Stratford Regional station and at central London interchanges and National Rail terminal stations. We are concerned for example about the ability of the Jubilee line to accommodate late night crowds from the proposed development and the O2 arena.

Car and cycle use, access and parking

54 The proposal has 37 car parking spaces including three blue badge spaces for operational staff uses only, which is in line with draft London Plan, although as set out in paragraph 92 it is not clear why visitor blue badge parking cannot also be provided within the site. For travel by customers, measures to minimise high levels of car access need to be explored and TfL officers have concerns that car travel to/from the development may be attractive, given the relative ease of access by road and the availability of parking in the vicinity of the venue (notably at Westfield Stratford City and at Newham town centre car park). As such, car travel may be higher than assumed, and not in line with London Plan Policy 6.1 and Policy T1 of the draft London Plan. Different scenarios including significant numbers of cars leaving the area at the same time will need to be tested, and any mitigation and parking controls agreed with LLDC, TfL and local highway authorities.

55 The site proposes 100 staff cycle parking spaces on the podium and 50 spaces on Montfichet Road, based on a 0.2% modal share for the largest events. This provision does not meet the London Plan standards for a D2 assembly and leisure use and is not accepted. Officers are also concerned that the low provision of cycle parking does not acknowledge the infrastructure improvements in place, such as Cycle Superhighway 2, and further proposed enhancements to cycling connections to the QEOP and catchment area for cycling trips. The applicant must demonstrate higher levels of cycle parking provision and where this will be provided alongside details of the quality Officers consider that a wider approach to the requirements for visitors by bicycle to the proposed development and station interchange and Metropolitan centre, including cycle hire, will need to be considered as a whole with LLDC and London Borough of Newham to identify and secure exemplary cycle provision and ease of access.

Healthy Streets and public realm

56 London Plan Policy 6.7 and Policy T2 of the draft London Plan require developments to support the Healthy Streets approach including to demonstrate how they will delivery improvements that support the ten Healthy Streets indicators and reduce the dominance of vehicles on London's streets. Given the range of uses and expected hours of operation there is expected to be an increase in all highway modes. Newham Council has recently delivered Stratford Gyratory enhancements, and the impact of additional events on the local highway network the bus station and taxi rank will need to be assessed.

57 The applicant sets out a new design for Montfichet Road in line with emerging principles for re-assigning highway capacity. Further investigation of the role of Montfichet Road as a multi-modal interchange needs to be undertaken to inform development of design options. TfL considers that the applicant's proposal to locate bus and coach stops serving Stratford further away from the Northern Ticket Hall entrance and Westfield Shopping Centre entrance will adversely affect passenger amenity.

58 The applicant is required to clarify how kerb space and highway capacity on Montfichet Road, and other nearby roads such as Westfield Avenue, Great Eastern Road and Angel Lane and car parking areas will operate both in event overlay mode given different impacts during event arrivals and departures as well as for general multi-modal interchange outside of event periods. This includes set-down and pick-up by coaches, buses (including rail replacement services), taxis, private hire

vehicles, private vehicles and emergency vehicle access together with crowd management and queuing arrangements and any hostile vehicle mitigation measures. This will be particularly relevant for the location of kerbside uses for the early morning finishes where rail capacity will be extremely limited.

59 The submission includes dynamic pedestrian modelling, and routings for different scenarios. The applicant sets out that visitor egress times from the local area will depend on the level of background demand, ranging from 20 minutes when there is little background demand, to 30 minutes when the station is busy, 45 minutes for a coincidence with a London Stadium event and up to 60 minutes for early morning finishes. While the podium and site may in theory be able to clear, with appropriate management measures such as to the Montfichet Road crossing, this does not reflect the issue of station capacity which would likely have significant knock on impacts to whether the area can be cleared as assumed. Current experience with other event clearance times and access to the station would suggest these scenarios are over optimistic.

60 This should be agreed by the Corporation, London Borough of Newham and TfL as appropriate and is likely to require alterations to the proposed arrangements tested with further Road Safety Audits and secured through an appropriate planning mechanism.

Infrastructure protection and construction

61 The site is adjacent to a Network Rail corridor including the Central line and a range of asset protection agreements and suitable planning conditions will be required for the construction and operation phases. The submitted Environmental Statement and associated technical reports provide an assessment of the impact of solar glare affecting train operators on the adjacent railway corridors, besides any distraction from the lighting proposals. Mitigation measures outlined within these assessments must be appropriately secured.

62 Highway access will be locally from Angel Lane and the programme for the construction of the proposed development and the impact of construction routes on the local highway network and walking and cycle routes will need to be resolved. TfL and London Borough of Newham as highway authority would be concerned at the duration of any works affecting Montfichet Road to avoid impact on the operation of Stratford City bus station, on- street bus and coach stops and taxi rank until such time that a new layout is delivered, and any amendments and impact on Angel Lane and Stratford Gyratory which form part of the SRN and the performance of the bus network and any impacts on pedestrians and cyclists. The impacts on these and local highways adjacent to the site will require co-ordination and mitigation accordingly such as through the established LLDC Construction Transport Management Group (CTMG).

Monitoring and review

63 A variety of data on the transport impact of the events together with feedback on the arrangements will need to be collected for ongoing operation mitigation for Travel Plan monitoring and future event planning and mitigation. The scope of these surveys should be agreed and secured by condition.

Transport summary

64 Further information and clarification on the details of the proposals and justification/amendments to the assumptions for the transport assessment and management of the area and transport facilities are required. A number of significant transport impacts from the development have been identified which will need to be fully and robustly resolved. Officers would welcome further discussion about the most effective planning and financial mechanism for mitigating any impact identified from this development. This matter must be resolved prior to the scheme being reported to LLDC's planning committee and any referral at Stage 2. The applicant should continue to

work collaboratively with TfL, Network Rail, transport operators, LLDC and London Borough of Newham to ensure that development impacts are mitigated, with a priority to address capacity at Stratford regional station and impact across the transport networks and local area to meet other London Plan policies and objectives. These are summarised as follows:

- An appropriate significant contribution related to the transport impact arising from this site and frequency of events towards congestion relief schemes, and internal wayfinding and signage at Stratford Regional station which would enable the delivery of interventions prior to first occupation of the site or other triggers to be agreed. Other interventions at other stations, especially Maryland station and Stratford International station, may also be required.
- An appropriate contribution towards increased staffing costs to enable safe operation of railway station and bus station and taxi ranks to deal with impacts arising from the development and the frequency of events, beyond event management staffing which the applicant would need to provide.
- In light of the issues set out to be resolved, the necessary mitigation is likely to require an appropriate balance between event calendar attendance and management, transport network (public transport and local highway) capacity, station capacities, event finish times and inter-dependencies between different surface modes and with rail modes. This may require an appropriate contribution or mechanism to enhance network capacities which the applicant would need to provide, and/or limits to finish times and capacities
- An appropriate contribution to enable the delivery of highway and public realm works for access and improvements to Montfichet Road and its kerbside uses, and other access, walking, cycling connections in the vicinity of the site such as Angel Road and routes to nearby transport hubs and enhanced cycle parking to ensure alignment with draft London Plan, Healthy Streets and Vision Zero

MCIL2

65 In accordance with London Plan Policy 8.3, the Mayor charges CIL for developments permitted on or after 1 April 2012. In June 2017, the Mayor published proposals for MCIL2 to contribute to Crossrail 2 funding, which was levied from April 2019. The charge for the LLDC is £60 per sq.m.

Urban design

66 Good design is central to all objectives of the London Plan. London Plan Policy 7.1 sets out a series of overarching design principles for development in London. The design policies within chapter 7 and elsewhere in the London Plan include specific design requirements relating to maximising the potential of sites, views and public realm. Policy 7.4 also requires that new development has regard to its context and makes a positive contribution to local character. The intent of these policies is reflected in draft London Plan Policies D1 and D2.

Layout, connectivity and access

67 The proposed Sphere sits on a multi-layered podium, comprising levels 0-3. The podium (level 2) is the main arrival level and fills the entirety of the site. The north and south terraces (level 3) can be accessed from the north and south of the podium, and partially extend over the podium below. The terraces contain landscaped areas and provide various access points to the main venue. From the podium, visitors can drop down into the plaza (level 1), which comprises office and retail space, the music club and bars and restaurants.

68 At present, the application site is in private ownership. It has a single point of access via a private road off Angel Lane and as such, does not provide connections to Stratford Town Centre to the

west. In accordance with the intent of Sub Area 3 and Site Allocation SA3.1, the proposed development would provide four new pedestrian access points, which would provide access and egress from the site:

- Bridge 1: connect the podium to Montfichet Road and leads to Stratford International Station;
- Bridge 2: connects the podium to Montfichet Road and leads to the Northern Ticket Hall entrance of Stratford Regional Station;
- Bridge 3: connects to the town centre link bridge which in turn leads to Westfield Stratford City Shopping Centre and other entrances to Stratford Regional Station;
- Bridge 4: is vehicular only to gain access to the service road over the subterranean HS1 railway line.
- Angel Lane Entrance connects the podium to Angel Lane for pedestrian access and connects the service yard to Angel Lane.

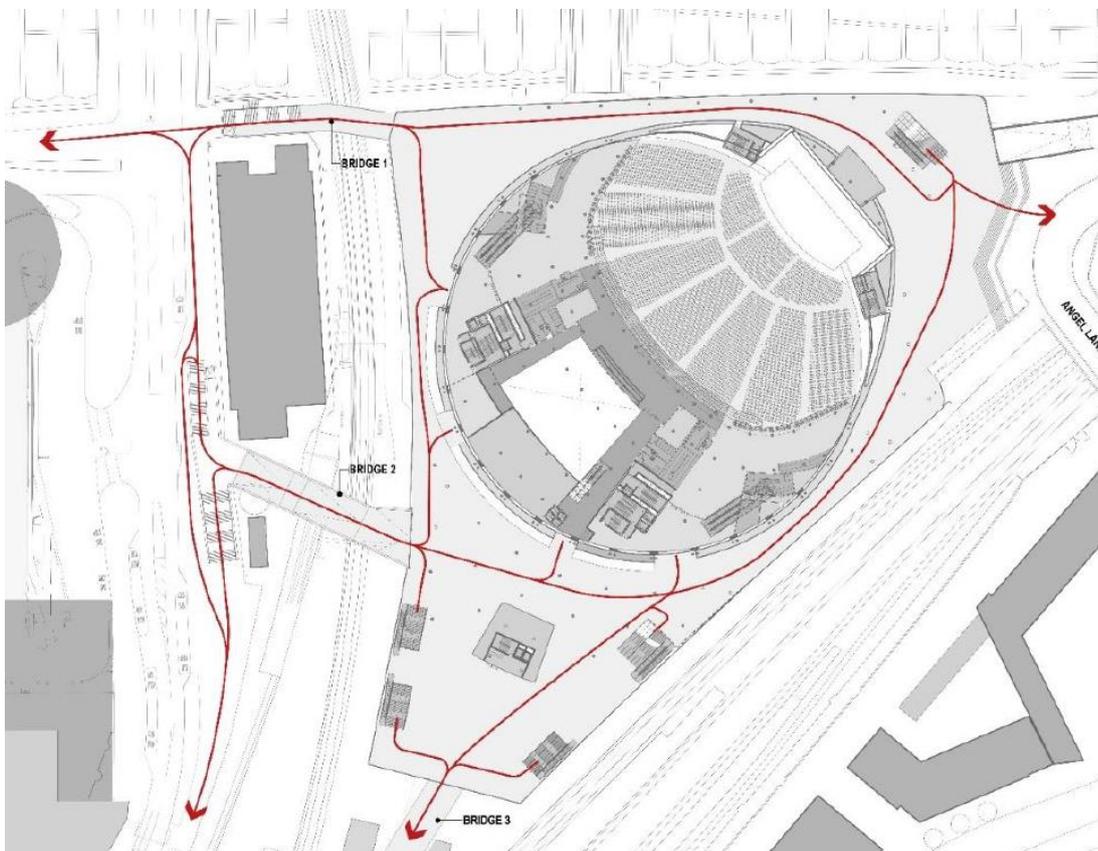


Image 2: Pedestrian access and movements

69 The proposal would improve pedestrian permeability within the surrounding area, provided that the pedestrian routes are available 24/7. Notwithstanding this and as detailed elsewhere in this report, further details are required to demonstrate how the capacity of the development would be capped and the likely occurrence of full-capacity events. GLA officers must be satisfied that size of public realm and width of access routes along the three pedestrian bridge links and Angel Road access can safely manage anticipated pedestrian flows. Consideration is also required in terms of the acoustic impacts of the crowds on surrounding residential properties.

70 The applicant has worked to maximise active frontages and key entrances, locating larger portions of public space accordingly, to create potential for an inviting and engaging sequence of

spaces. The proposal demonstrates that a civic square setting would be created at the southern end of the sphere at the lower and upper podium. The North Hub podium opening has the potential to create a community hub accessible to residents of the Angel Lane and Leyton Road area, provided it is suitably accessible. In line with draft London Plan Policy D7, the proposed areas of public realm, routes through the site and external amenity areas must incorporate appropriate acoustic design principles to mitigate impact on surrounding residential occupiers.

71 The proposed landscaping strategy must be designed to ensure the success of the podium and terrace levels as areas of high quality, usable public realm. As part of this work, the strategic requirements of the Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG should be addressed and the applicant is encouraged to incorporate play space and types of play elements for different age groups. The final provision of play should be secured by condition or S106 agreement.

72 Whilst the proposed routes through the site would be publicly accessible during operational hours and events, in response to feedback from the Metropolitan Police, the applicant seeks to retain the right to close the site during non-event times. In line with draft London Plan Policy D7, whether publicly or privately owned, the public realm and routes through the site should remain open, free to use and offer the highest level of public access while still ensuring public safety. Access restrictions to the site would only be considered acceptable in exceptional circumstances when they are considered essential for safe management of the space. Should the applicant require the closure of the site during specified times (i.e. for maintenance or emergency), these parameters should be agreed with the Corporation and the wording of the relevant draft S106 obligations should be shared with the GLA and TfL.

73 The proposed changes to the eastern footway of Montfichet Road, in particular the section where bridge 2 meets the footway, must improve the public realm in ways that contribute positively to London Plan and Mayor's Transport Strategy objectives. They should encourage walking, cycling and public transport use, as well as being in conformity with London Plan Policies D3 and D7. Space for pedestrian gathering and movement, particularly to and from bus and coach stops and taxi ranks, must not be compromised. The area around the bottom of the Bridge 2 steps is particularly sensitive and the likelihood of people gathering in this area and using the steps as informal seating must be taken into account.

Height, massing and architecture

74 The proposed development includes a sphere-shaped arena, externally clad in LED panels. Given the distinctive, landmark character of the proposed form and scale of the development, the Corporation must secure sufficient information, as part of any permission, to ensure the design quality is carried through to delivery, with focus given to ongoing maintenance practices and building longevity. In terms of the context of surrounding development, the proposal would not be the tallest building in the area. Notwithstanding this, given the width, nature and the external illumination, the proposal would be the most visually prominent development. In addition to this, the site sits within a built-up context and as such, the proposal must carefully consider its relationship with adjacent sensitive uses. Continued public consultation must take place throughout the entire design process.

75 The external LEDs would be used to display content associated with the events and advertisements. Officers have significant concerns regarding the suitability of an illuminated façade, given the form, height and close relationship to surrounding sensitive uses. Whilst this feature of the scheme is recognised as being intrinsic to the primary function of the proposals, the acceptability of a potentially visually intrusive addition to the local area is dependent on the ability sufficiently mitigate adverse impacts. This would include stringent controls on hours of illumination, key details of the façade's structural makeup and cladding, and details of the building's maintenance strategy (as set out elsewhere in this report).

76 A separate application to display advertisements has been submitted to the LLDC which and seeks permission for the display of advertisements on the external surface of Sphere. Whilst this application is not referable to the Mayor, GLA officers express serious concern regarding the intention to display illuminated advertisements at the scale proposed (up to 96 meters in height). An advertisement of this scale within a built-up area would have significant environmental, visual and amenity impacts, potentially contrary to draft London Plan Policy D8 (Tall buildings), which also confirms that local transport and walking and cycling networks must be capable of accommodating the proposed quantum of development.

Historic environment and views

77 London Plan Policy 7.8 states that development should identify, value, conserve, restore, re-use and incorporate heritage assets where appropriate. Draft London Plan Policy HC1 seeks to ensure that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the asset's significance and appreciation within their surroundings. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should "have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses" and in relation to conservation areas, special attention must be paid to "the desirability of preserving or enhancing the character or appearance of that area".

78 London Plan Policy 7.8 and draft London Plan Policy HC1 also apply to non-designated heritage assets. The NPPF states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application, and a balanced judgement is required having regard to the scale of any harm or loss and the significance of the heritage asset. Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

79 As set out above, the site is not located in a Conservation Areas and contains no listed buildings. The nearest heritage asset is the Grade II* listed Theatre Royal, located approximately 210 metres to the south-east of the site. Stratford Saint John's Conservation Area, which includes the Grade II Listed Saint John's Church, is located beyond the Theatre Royal, approximately 320 metres to the south-east of the site. Accordingly, given the separation distances and built-up nature of the surrounding area, the height and massing of the proposal would have a negligible impact on surrounding heritage assets. However, as discussed elsewhere in this report, the external LED cladding raises concern and the applicant must demonstrate that the illumination would not adversely impact the setting of surrounding heritage assets.

80 The applicant has provided a Townscape, Built Heritage and Visual Impact Assessment (TBHVIA) in support of the application. The development would result in a significant and striking addition in shorter-range views, especially within views from the east, along Angel Lane, on the approach from Maryland Station and at the junction of Penny Brookes Street/Montfichet Road. The Sphere would have the greatest impact on local townscape and sensitive receptors, during periods of illumination. Notwithstanding this, the appearance of the Sphere whilst not illuminated must also be fully considered by LLDC officers.

Residential impact

81 The proposed development would have the greatest impact on the adjacent developments to the north and south. Chobham Farm residential development is located to the north, whilst a residential development, a hotel and student accommodation (Unite Student Accommodation, Moxy Hotel and Stratford Central) sit adjacent to the eastern site boundary, along Angel Lane. The minimum separation distance to these properties is approximately 50 metres.

82 The limited distance between the application site and adjoining sensitive land uses is a challenging interface which must be fully addressed. The applicant must comply with the Agent of Change principles set out in Policy D12 of the draft London Plan, which places the responsibility for mitigating the impact of noise and other nuisances, on the proposed development. Whilst the Agent of Change principle predominantly concerns the impact of noise generating activities, other nuisances should also be considered, including dust, odour, light and vibrations.

83 As discussed elsewhere in this report, the acoustic impact from the proposed uses and noise from the gathering and movement of crowds must be carefully considered. Any impact from vibrations during events must also be robustly scrutinised and necessary mitigation measures or controls secured. The proposal must secure necessary acoustic design measures to ensure that the new development has effective measures in place to mitigate and minimise potential noise impacts on neighbour amenity issues. Ongoing and longer terms management of mitigation, such as a noise and vibrations management plan, should also be secured.

84 GLA officers consider that the amount and orientation of external LED display lighting will create significant light impacts. The applicant has advised that the level of light emitted from the Sphere will be fully controllable and can be regulated in intensity at an LED or panel level. The façade will have differing light intensities applied to the LED lights to control light emissions to surrounding properties. Further discussion is required in this respect and officers note that while not referable, an application for advertisement consent has been submitted alongside this application. Given the close proximity of residential properties to the north and east of the site, the proposal must demonstrate that the external content of the Sphere, including illuminance levels and the hours of display, would not significantly impact surrounding residential amenity, in line with London Plan Policy 7.6 and draft London Plan Policies D4, D7 and D12. GLA officers would therefore welcome further discussions regarding the required controls and parameters of the external LED panels.

85 The submitted Environmental Statement and associated technical reports provide an assessment on the impacts of noise and vibration, wind tunnelling, daylight and overshadowing, light intrusion and upwards sky glow; and solar glare. Mitigation measures outlined within these assessments must be appropriately secured. Wording of conditions and S106 obligations must be shared with the GLA prior to Stage 2 referral.

86 The applicant must address the matters outlined above to demonstrate that the surrounding residential amenity is not compromised.

Inclusive design

87 London Plan Policy 7.2 requires that all new development is accessible and inclusive. This intent is reflected within London Plan Policy 3.16 which specifically relates to the provision of social infrastructure. Similarly, draft London Plan Policy D3 seeks to achieve an inclusive design approach to new development.

88 An Access Strategy has been developed in consultation with the Corporation and the Built Environment Access Panel (BEAP). During full capacity events (21,500) a minimum of 155 wheelchair seats will be provided within the Sphere. A further 155 seats will be suitable for ambulant disabled

guests. In terms of access to the site, lifts are proposed as part of Bridge 1 and 2 along Montfichet Road. Additional lift access is also available at both sides of the town centre bridge. The lifts have the capacity to accommodate two wheelchair users and companions. In line with draft London Plan Policy D11, the applicant should confirm that the proposed lifts could be used for fire evacuation purposes. A protected wheelchair ramp is proposed along Angel Lane.

89 Whilst the proposal would include 37 parking spaces at level 0, visitor blue badge parking would not be provided on-site. Visitors to the venue would be required to utilise existing blue badge spaces within Westfield Stratford City car parks (109 minimum) or additional provision at other car parks. A free of charge mobility assisted shuttle service will operate between the blue badge parking and the Sphere, although the exact form of this service is not set out and will need to be resolved. In line with draft London Plan Policy T6.5, the applicant should provide further details to provide on-site parking and to justify the absence of on-site visitor blue badge parking, to ensure ease of access to the site.

Sustainable development

Energy

90 The applicant has followed the London Plan's energy hierarchy and the proposed strategy is generally supported; however, further information is required before the proposals would comply with London Plan Policy 5.9 and draft London Plan Policy S12. In line with the draft London Plan target of 15% improvement on 2013 Building Regulations, the applicant should model energy efficiency measures and commit to a higher carbon savings through energy efficiency alone. Further details of cooling and overheating should be provided in line with the 'be lean' element of the hierarchy. In terms of 'be clean', further information is required in terms of the floor area, internal layout and location of the energy centre. For the 'be green' element of the hierarchy, further detailed information is required for the proposed heat pumps, including SCOP and SEER energy modelling. The applicant is also required to reinvestigate the inclusion of renewable technologies. Whilst the feasibility of a PV array has been discounted, the applicant should review the potential for novel forms of PV on the areas of roof which are not LED screens.

91 The predicted unregulated loads, for instance from audio and LED screens, are expected to be very high, both in absolute terms and as a proportion of the development energy loads. Further detailed consideration of the potential for unregulated energy efficiency measures is encouraged.

92 The applicant should confirm the proposed on-site reduction in CO₂ per year. The carbon dioxide savings are expected to fall short of the target within Policy 5.2 of the London Plan. The applicant should consider the scope for additional measures aimed at achieving further carbon reductions.

93 The detailed technical comments have been sent to the applicant and the Corporation.

Flood risk management and sustainable drainage

94 The site is within Flood Zone 1 and greater than 1 hectare in area. A Flood Risk Assessment (FRA) has been submitted as required under the NPPF. Overall, the approach to flood risk management for the proposed development complies with London Plan Policy 5.12 and draft London Plan Policy S12.

95 The surface water drainage strategy for the proposed development generally complies with London Plan Policy 5.13 and draft London Plan Policy S1.13.

96 The proposed development generally meets the requirements of London Plan Policy 5.15 and draft London Plan Policy S1.5, relating to water efficiency.

Urban greening

97 The range of planting typologies is welcomed however, whilst the application recognises the relevance of draft London Plan Policy G5, the Urban Greening Factor (UGF) has not been calculated. The applicant should calculate the development's Urban Greening Factor and seek to achieve the specified target. The calculation of the UGF should be accompanied by a colour coded plan showing the location and extent of each surface cover type proposed.

98 The application should set out the development's likely effect on the urban heat island and set out mitigation measures.

Local planning authority's position

99 The proposal has been the subject of pre-application discussions with the Corporation planning officers. The application is still under consideration.

Legal considerations

100 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Corporation must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Corporation under Article 6 of the Order to refuse the application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

101 There are no financial considerations at this stage.

Conclusion

102 London Plan and draft London Plan policies on opportunity areas, town centres, entertainment facilities, public safety, visitor economy, culture and creative industries, night time economy, agent of change, urban design, heritage, inclusive design, energy, flood risk and transport are the key strategic issues relevant to this planning application. As presented, the application does not comply with the London Plan and draft London Plan. However, full resolution of the following issues could possibly lead to the application becoming compliant with the London Plan and draft London Plan:

- **Land use principles:** Whilst the proposed land uses are broadly supported and the possible contributions towards London's culture and creative industries and night time economy are welcomed, the issues detailed within this report must be fully resolved before an entertainment venue of this scale and in this location can be supported in strategic planning terms.
- **Public safety, security and event management:** The capacity of the proposed development and number of event days raises significant concern in terms of crowd control, public transport capacity and public safety. The concerns raised by GLA officers must be fully resolved prior to Stage 2 referral.
- **Transport:** The proposals raise a number of very significant transport concerns, in particular in relation to assessment and modelling assumptions at Stratford Regional station, highways and public transport network capacity, pedestrian flows and movements to and from the site, relationships with other major events and, overall, the impact on all users at this crucial multi-

modal strategic interchange. These must be fully resolved before the application is referred to the Mayor at Stage 2.

- **Urban design:** The public realm and routes through the site should remain open, free to use and offer the highest level of public access and restrictions should be limited to exceptional circumstances for example when essential for maintenance and emergency access.

The impacts of the proposed external LED cladding require further assessment to demonstrate that the scheme's impact on surrounding residential properties, the setting of heritage assets and short and long-range views would be acceptable. Furthermore, the intention to display illuminated advertisements at the scale proposed in this location raises significant concerns and could have extensive environmental, visual and amenity impacts which will need to be fully assessed (paragraphs 89-83).

- **Residential amenity:** In line with draft London Plan Policy D12, the proposal must ensure that surrounding residential amenity is not compromised. Appropriate mitigation measures must be secured to control the impacts of noise, vibrations and light pollution, including solar glare.
- **Inclusive design:** In line with Policy T6.5, the applicant should justify the absence of on-site visitor blue badge parking.
- **Sustainable development:** Further information is required regarding energy efficiency measures, carbon savings, cooling and overheating and renewable technologies.

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