

**From:** s.40  
**To:** s.40 Daniel.Davies  
**Cc:** s.40  
**Subject:** RE: MSG - Arup High Level Review of remaining/outstanding issues  
**Date:** 26 March 2020 14:35:53  
**Attachments:** [March 2020 Jacobs update.odt](#)

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Dan

And here is an overview of the status for the transport topics.

Regards

s.40 | [Jacobs](#) | Director of Transport Planning  
 M: +44 (0) s.40 | s.40 @jacobs.com  
 Cottons Centre Cottons Lane | London SE1 2QG | United Kingdom  
[www.jacobs.com](http://www.jacobs.com) | [LinkedIn](#) | [Twitter](#) | [Facebook](#) | [Instagram](#)

---

**From:** s.40 <s.40@arup.com>  
**Sent:** 26 March 2020 12:11  
**To:** Daniel.Davies <Daniel.Davies@londonlegacy.co.uk>  
**Cc:** s.40 <s.40@jacobs.com>; s.40 <s.40@arup.com>  
**Subject:** [EXTERNAL] MSG - Arup High Level Review of remaining/outstanding issues

Hi Dan,

Please find attached a high level summary of the outstanding/remaining issues for discussion tomorrow. This note was originally prepared prior to the QC briefing so I've just updated based on latest information.

Many thanks,

s.40

s.40  
 Senior Consultant | Environmental Consulting  
 BSc (Hons) MSc PIEMA

Arup  
 13 Fitzroy Street London W1T 4BQ United Kingdom  
 d: +44 20 s.40 m: +44 s.40  
[www.arup.com](http://www.arup.com)

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**From:** s.40  
**To:** Daniel Davies; s.40  
**Subject:** RE: MSG Reg 25 'Plus - any updates  
**Date:** 30 March 2020 15:47:30  
**Attachments:** [March 2020 Jacobs update.odt](#)

---

s.40

Attached is a version with an additional summary of issues/actions.

Regards

s.40 | [Jacobs](#) | Director of Transport Planning  
M: +44 (0) s.40 | s.40 | [@jacobs.com](#)  
Cottons Centre Cottons Lane | London SE1 2QG | United Kingdom  
[www.jacobs.com](#) | [LinkedIn](#) | [Twitter](#) | [Facebook](#) | [Instagram](#)

---

**From:** Daniel Davies <DanielDavies@londonlegacy.co.uk>  
**Sent:** 30 March 2020 12:53  
**To:** s.40 <s.40@arup.com>; s.40 <s.40@jacobs.com>  
**Subject:** [EXTERNAL] MSG Reg 25 'Plus - any updates

s.40

I'm was going to send out a copy of what we went through on Friday to Anthony and Pinsents before we meet to discuss on Wednesday

Just checking in to see if you have any updates before I do?

s.40 - you were going to set out the deliverables we expected of MSG – which presumably just an updated TA + how they are responding to the movement and distraction piece?

s.40 have you heard back from s.40 ?

If you could get back to me by 4pm that would be great.

**Daniel Davies**  
**Principal Planning Development Manager (Planning Policy and Decisions Team)**

London Legacy Development Corporation  
Level 10  
1 Stratford Place, Montfichet Road  
London  
E20 1EJ

DD: 020 3288 s.40  
Mob: s.40  
Email: [danieldavies@londonlegacy.co.uk](mailto:danieldavies@londonlegacy.co.uk)

**From:** [Daniel Davies](#)  
**To:** [s.40](#); [s.40](#); [s.40](#); [s.40](#); [s.40](#); [Catherine Smyth](#); [Anthony Hollingsworth](#); [s.40](#); [s.40](#)  
**Subject:** FW: MSG Reg 25 Review with Pinsent Masons  
**Date:** 31 March 2020 09:11:54  
**Attachments:** [March 2020 Jacobs update with Summary.odt](#)  
Extracted - not relevant  
Extracted - not relevant

---

Hi all,

This email contains an updated documents for review on Wednesday.

Also attached is a review of the applicant's townscape methodology for PM to review. Only need the summary for now which is one or two pages.

Best,

**Daniel Davies**  
**Principal Planning Development Manager (Planning Policy and Decisions Team)**

London Legacy Development Corporation  
Level 10  
1 Stratford Place, Montfichet Road  
London  
E20 1EJ

DD: 020 3288 [s.40](#)  
Mob: [s.40](#)  
Email: [danieldavies@londonlegacy.co.uk](mailto:danieldavies@londonlegacy.co.uk)



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**From:** Daniel Davies  
**Sent:** 30 March 2020 19:01  
**To:** [s.40](#) <[s.40@londonlegacy.co.uk](mailto:s.40@londonlegacy.co.uk)>; [s.40](#) <[s.40@arup.com](mailto:s.40@arup.com)>; [s.40](#) <[s.40@jacobs.com](mailto:s.40@jacobs.com)>; [s.40](#) <[s.40@arup.com](mailto:s.40@arup.com)>; [s.40](#) <[s.40@pinsentmasons.com](mailto:s.40@pinsentmasons.com)>; Catherine Smyth <[CatherineSmyth@londonlegacy.co.uk](mailto:CatherineSmyth@londonlegacy.co.uk)>; Anthony Hollingsworth <[AnthonyHollingsworth@londonlegacy.co.uk](mailto:AnthonyHollingsworth@londonlegacy.co.uk)>; [s.40](#) <[s.40@pinsentmasons.com](mailto:s.40@pinsentmasons.com)>; [s.40](#) <[s.40@londonlegacy.co.uk](mailto:s.40@londonlegacy.co.uk)>  
**Subject:** MSG Reg 25 Review with Pinsent Masons

Hi all,

Two documents attached setting out where we think we are in terms of outstanding information. One covering environment / the other transport.

For the Jacobs report, suggest you head to the back end of the document first for a quick read on the headline deliverables.

See you on Wednesday

**Daniel Davies**  
**Principal Planning Development Manager (Planning Policy and Decisions Team)**

London Legacy Development Corporation  
Level 10  
1 Stratford Place, Montfichet Road  
London  
E20 1EJ

DD: 020 3288 **s.40**

Mob: **s.40**

Email: [danieldavies@londonlegacy.co.uk](mailto:danieldavies@londonlegacy.co.uk)



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**From:** [Daniel Davies](#)  
**To:** s.40 ; s.40 ; s.40 @triumenv.co.uk; s.40  
**Cc:** s.40 ; s.40 ; s.40 ; Anthony Hollingsworth; s.40  
**Subject:** MSG Planning and Reg 25 Review  
**Date:** 17 April 2020 18:04:27  
**Attachments:** Extracted - not relevant  
Extracted - not relevant  
Extracted - not relevant  
Extracted - not relevant  
[March 2020 Jacobs update with Summary.pdf](#)

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Hi s.40

As discussed, some detailed comments (attached) in support of the presentation I gave earlier this month. There are four principal documents:

- Traffic and transport note detailing outstanding issues– prepared by Jacobs
- High Level Review of outstanding environmental issues – prepared by ARUP
- ES Review document – focusing on Health: - prepared by Arup
- Townscape, Built Heritage and Visual Impact Assessment Review – prepared by ARUP.

Collectively the documents set out where we think there are potential Reg. 25 issues – (Transport, Light and Health) and where clarifications are needed. Information to support the consideration of planning issues has also been listed. There are no 'new' issues that we haven't already discussed. Notwithstanding this, this does not preclude information being requested where there are good reasons for doing so.

I should add that we have received s.40 letter setting out a revised planning programme. We will review and respond shortly.

If you have any questions, just let me know.

Best wishes,

**Daniel Davies**  
**Principal Planning Development Manager (Planning Policy and Decisions Team)**

London Legacy Development Corporation  
Level 10  
1 Stratford Place, Montfichet Road  
London  
E20 1EJ

DD: 020 3288 s.40  
Mob: s.40  
Email: [danieldavies@londonlegacy.co.uk](mailto:danieldavies@londonlegacy.co.uk)

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**From:** s.40  
**To:** Daniel Davies; s.40  
**Subject:** RE: MSG Planning Programme Letter - Draft  
**Date:** 21 April 2020 10:32:37  
**Attachments:** [Response to MSG Planning Programme Letter v0.1 RSS.docx](#)

---

Dan

Not so challenging a task as you implied.

See attached with comments, mostly minor typos. I was surprised that there were not more non-transport issues but that is for s.40 to consider.

On transport, do we need to raise pick-up and drop-off more explicitly? Should we include something like:

“There remain concerns regarding the arrangements for pick-up and drop-off, which are further complicated by the potential HS1 car park option. Greater detail and clarity is needed and helpfully this would address both the HS1 car park option and whatever would be your fall-back option.”

Regards

s.40 | [Jacobs](#) | Director of Transport Planning  
M: +44 (0) s.40 | [s.40@jacobs.com](#)  
Cottons Centre Cottons Lane | London SE1 2QG | United Kingdom  
[www.jacobs.com](#) | [LinkedIn](#) | [Twitter](#) | [Facebook](#) | [Instagram](#)

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**From:** Daniel Davies <DanielDavies@londonlegacy.co.uk>  
**Sent:** 21 April 2020 09:57  
**To:** s.40 <s.40@arup.com>; s.40 <s.40@jacobs.com>  
**Subject:** [EXTERNAL] MSG Planning Programme Letter - Draft

Hi all,

As discussed, draft response letter to DP9 on the key planning issues. Comments welcome.  
s.40 you will recognise much of the text)

Best,

**Daniel Davies**  
**Principal Planning Development Manager (Planning Policy and Decisions Team)**

London Legacy Development Corporation  
Level 10  
1 Stratford Place, Montfichet Road  
London  
E20 1EJ

DD: 020 3288 s.40  
Mob: s.40  
Email: [danieldavies@londonlegacy.co.uk](mailto:danieldavies@londonlegacy.co.uk)

**From:** s.40  
**To:** Daniel Davies; s.40  
**Subject:** RE: MSG Planning Programme Letter - Draft  
**Date:** 21 April 2020 12:28:07  
**Attachments:** [Response to MSG Planning Programme Letter v0.1 RSS AC.DOCX](#)

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Hi Dan,

I've tracked in changes to s.40 version – please see attached.

I've noted that clarity is needed on the assessment of the updated façade material and in relevant sections added some suggested text to say relevant ES chapters will need to be reviewed and updated in light of new transport modelling work – this should capture health effects etc.

Environmental effects in general will need to be considered for the HS1 car park – particularly noise where there will likely be additional receptors that need assessing.

I wonder if there also needs to be a separate section stating we need a clearer understanding of health/wellbeing & equality effects on specific receptor groups/populations, such as Holden Point? This has also been raised by Newham.

Happy to chat through if easier.

Many thanks,  
s.40

---

**From:** Daniel Davies <DanielDavies@londonlegacy.co.uk>  
**Sent:** 21 April 2020 11:33  
**To:** s.40 <s.40@jacobs.com>; s.40 <s.40@arup.com>  
**Subject:** [External] RE: MSG Planning Programme Letter - Draft

Thanks s.40

I agree, we should probably include something more explicitly on pick up and drop so I will include the suggested text.

Fair point on the non-transport issues. I will discuss with s.40 about when we review.

Appreciate the quick turnaround.

Best,

**Daniel Davies**  
**Principal Planning Development Manager (Planning Policy and Decisions Team)**

London Legacy Development Corporation  
Level 10  
1 Stratford Place, Montfichet Road  
London  
E20 1EJ

DD: 020 3288 s.40  
Mob: s.40  
Email: [danieldavies@londonlegacy.co.uk](mailto:danieldavies@londonlegacy.co.uk)

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---

**From:** s.40 [mailto:s.40@jacobs.com]  
**Sent:** 21 April 2020 10:32  
**To:** Daniel Davies <[DanielDavies@londonlegacy.co.uk](mailto:DanielDavies@londonlegacy.co.uk)>; s.40 <s.40@arup.com>  
**Subject:** RE: MSG Planning Programme Letter - Draft

Dan

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See attached with comments, mostly minor typos. I was surprised that there were not more non-transport issues but that is for s.40 to consider.

On transport, do we need to raise pick-up and drop-off more explicitly? Should we include something like:

“There remain concerns regarding the arrangements for pick-up and drop-off, which are further complicated by the potential HS1 car park option. Greater detail and clarity is needed and helpfully this would address both the HS1 car park option and whatever would be your fall-back option.”

Regards

s.40 | [Jacobs](http://jacobs.com) | Director of Transport Planning  
M: +44 (0) s.40 | s.40@jacobs.com  
Cottons Centre Cottons Lane | London SE1 2QG | United Kingdom  
[www.jacobs.com](http://www.jacobs.com) | [LinkedIn](#) | [Twitter](#) | [Facebook](#) | [Instagram](#)

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**Sent:** 21 April 2020 09:57  
**To:** s.40 <s.40@arup.com>; s.40 <s.40@jacobs.com>  
**Subject:** [EXTERNAL] MSG Planning Programme Letter - Draft



Hi all,

As discussed, draft response letter to DP9 on the key planning issues. Comments welcome.  
(s.40) you will recognise much of the text)

Best,

**Daniel Davies**  
**Principal Planning Development Manager (Planning Policy and Decisions Team)**

London Legacy Development Corporation  
Level 10  
1 Stratford Place, Montfichet Road  
London  
E20 1EJ

DD: 020 3288 (s.40)  
Mob: (s.40)  
Email: [danieldavies@londonlegacy.co.uk](mailto:danieldavies@londonlegacy.co.uk)

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**From:** [Daniel Davies](#)  
**To:** s.40; s.40; [Anthony Hollingsworth](#); s.40; s.40; [Catherine Smyth](#); s.40; s.40  
**Subject:** Response to MSG Planning Programme - Draft for QC review  
**Date:** 21 April 2020 17:18:36  
**Attachments:** [Response to MSG Planning Programme Letter v0.2.DOCX](#)

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Hi s.40

Attached is a copy of the letter prepared in response for DP9's re the planning programme. It sets out the key matters which we think need to be resolved before the scheme can go to planning committee.

For the benefit of others – we have a slot with s.40 this Friday at 10am where he will provide feedback before we finalise the draft for issue.

Meeting invitation to follow shortly for those that are able to attend.

Best wishes,

**Daniel Davies**  
**Principal Planning Development Manager (Planning Policy and Decisions Team)**

London Legacy Development Corporation  
Level 10  
1 Stratford Place, Montfichet Road  
London  
E20 1EJ

DD: 020 3288 s.40

Mob: s.40

Email: [danieldavies@londonlegacy.co.uk](mailto:danieldavies@londonlegacy.co.uk)

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**From:** [Daniel Davies](#)  
**To:** s.40 [REDACTED] s.40 [REDACTED]@networkrail.co.uk; s.40 [REDACTED]  
**Subject:** LLDC Response the MSG Planning Programme (Draft)  
**Date:** 23 April 2020 13:41:05  
**Attachments:** [Response to MSG Planning Programme Letter v0.2.DOCX](#)

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Hi all,

Thanks for the meeting earlier.

Attached is a draft of the letter I've sent to our barrister. If you could let have any comment you have by say midday tomorrow, it would be much appreciated.

Subject to comments on the Barrister we are planning to issue it to MSG tomorrow.

Would appreciate it if you treated this letter as confidential and don't circulate.

Best wishes,

**Daniel Davies**  
**Principal Planning Development Manager (Planning Policy and Decisions Team)**

London Legacy Development Corporation  
Level 10  
1 Stratford Place, Montfichet Road  
London  
E20 1EJ

DD: 020 3288 s.40 [REDACTED]  
Mob: s.40 [REDACTED]  
Email: [danieldavies@londonlegacy.co.uk](mailto:danieldavies@londonlegacy.co.uk)

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Our ref: 19/00097/FUL and 19/00098/ADV  
24 April 2020

Chris Goddard  
DP9 Ltd  
100 Pall Mall  
London  
SW1Y 5NQ

By email:

Dear Chris,

**MSG SPHERE (19/00097/FUL AND 19/00098/ADV)**

**Land lying to the west of Angel Lane, Stratford, London, E15 1AA**

Thank you for your letter of 15 April 2020 setting out your intended programme to target a July Planning Decisions Committee and acknowledging the need for a further round of public consultation. We share a commitment to work towards reporting your application to a committee as soon as practicable and agree that further discussions should take place with officers, our specialist advisors and key stakeholders.

As a considerable amount of further information about your application is being prepared by you, some of which is new and not already in the public domain, we consider the public interest in this case weighs in favour of consultation on the entirety of these further formal submissions. This would be consistent with our approach to consultation on the application to date. The proposed change of use of parking spaces at Stratford International car park is likely to be material to the operation of the main scheme and so it seems sensible that we consult on this proposal concurrently.

We are keen to agree an updated PPA but we are also mindful that previous timetables put forward have tended to be overly optimistic, particularly given the complexity of the issues and the number of statutory parties involved in commenting on the proposals. The revised programme you have put forward helpfully allows time for some peer review which is welcome, but based on our understanding of the issues in question, and our experience to date, I do not think the programme you have set out is realistic. There are still complex operational effect interactions to be assessed and peer-reviewed and, as stated above, to be subject to public

consultation. All of this, together with the current COVID-19 restrictions which will have an impact particularly in terms of consultation, would mean that in our view, there is a reasonable expectation that the tasks identified are likely to take longer than anticipated in your proposed timetable.

I appreciate that your client is looking for as much certainty on a Committee date as possible, but I suggest we focus and agree on the key issues and details are which still subject to further assessment and consultation before the application can be reported to Committee. The principal matters are those summarised below from the local planning authority's perspective and we would welcome your comment on this.

Whilst we therefore consider a November Committee date is a more realistic expectation given the issues identified, I can reassure you that this does not preclude reporting the application to an earlier committee if all necessary assessment work and consultation and peer review is achieved.

The matters listed below are intended to provide clear direction on the further work anticipated, reflecting previous discussions and earlier correspondence, meetings and presentations.

**Impacts on Stratford Station** – the analysis has highlighted a risk that visitors to a full capacity matinee would use Stratford Station at the same time as arrivals for an evening event. This could potentially result in a higher peak impact than has been assessed to date. We have since agreed broad parameters of what we consider need to be assessed and I understand your further assessment work is underway and being finalised.

The new Montfichet Road entrance you are proposing offers a potential to reduce adverse impacts and add capacity to the station more generally, but in other areas the development will worsen conditions regardless of the new entrance as there remain a number of pinch-points and areas vulnerable to increased congestion. The degree to which this will represent, in aggregate, a reasonable balance in terms of overall effects will depend in part on a review of this further station modelling work.

Feasibility of the station entrance design, construction and assumed costings should also be provided for peer review and ideally allow for the delivery of temporary accommodation. The information provided to date is at best a concept design and we would expect to have some reassurance that sufficient information is being made available to allow the rail operators to collectively indicate whether the proposal is supported or not and whether it would meet their operational needs. We will also need clarity on who will own and operate the physical asset if we are to begin considering and drawing up the necessary planning obligations.

An issue not addressed to date is the potential need for a 'future year' model. On one hand, given the already committed and expected growth in the area, the lack of a future year forecast may have the result of understating the expected level of crowding/congestion on the Stratford transport networks. Conversely, if proposed mitigation were to achieve a 'nil detriment' position in the base year then that could equally translate to avoiding a future year being any more congested than it would otherwise be.

In any case, Transport for London has expressed the view that some level of future year assessment should be provided so you will need to explore whether there is a model that can be agreed in consultation with Network Rail and the rail operators.

Consideration should also be given as to whether this analysis will alter the environmental effects reported within the Environmental Statement, and assessments should be updated accordingly.

**Crowd modelling**– the potentially higher peak impacts stated above are also likely to give rise to impacts on the pedestrian network. As such, updated crowd modelling showing the impact of the higher peak should be provided. Ideally the station and external pedestrian modelling would be directly linked to demonstrating clearly any effect interactions. However, if this is not feasible an improved explanation of how the two models do link together and a reasoned assurance as to why you consider that there are no potential gaps in the assessment should be provided.

It remains the case that the analysis to date has, perhaps inevitably, assumed highly directed visitor routeing. The results of any updated modelling need to be considered in the context that this is unlikely to be fully realised (for example with visitors using the Northern Ticket Hall even if the new Montfichet Road entrance is introduced).

We also understand that it remains the case that visitors to the venue will in some circumstances be held for extended periods on the venue podium to avoid over-loading the station. The impact of visitors choosing alternative routes to avoid the consequent delays needs to be taken into account in any updated analysis. We need to be satisfied that the assessment of pedestrian flows to and from the site properly considers the multiple groups in this area who may experience the same adverse impacts at this crucial multi-modal interchange. Consideration should also be given to whether the updated crowd modelling will give rise to likely environmental effects, particularly in relation to health and wellbeing, beyond those already reported within the Environmental Statement and if so updates should be provided accordingly.

**Concept of Operations (ConOps)** – The current proposals give limited reassurance that event coincidences would be manageable. On some occasions Sphere and O2 events seem inevitably to coincide but the proposed mitigation of impacts on the Jubilee line need clarification. Similarly,

there is uncertainty regarding the acceptability and consequential deliverability of the coordination arrangements with the London Stadium and rail operators who are accountable for the Safety Case of day to day operations at Stratford Station.

The operational needs and requirements from the perspective of these and other third parties should be provided as part of the ConOps, particularly where mutual cooperation is relied upon to achieve necessary mitigation. We need to be satisfied that the expectations placed on the primary stakeholders are clear in addition to the dependencies and resourcing requirements assumed and that they are realistic.

The practical working of changing event times and capacities needs to be carefully thought through and reflect the requirements of those stakeholders who will play a key role in the management of the area. Detailed discussions are needed on this. It is likely that achieving consensus on the thresholds for different management actions will be required. It seems to us that this may be difficult to progress until the updated modelling work has been undertaken and peer reviewed.

Critically, it is also conceivable that the Sphere operations will shorten the period assumed before further strategic intervention is required at Stratford Station. The ConOps should reflect that capacities at the Sphere may need to be reduced to accommodate these works or in response to other dependencies.

A range of operational scenarios have been assessed but consideration should also be given to the conceivable 'extreme event' scenario – where agreement with partners and stakeholders cannot be reached e.g. for example where there is a late change in the Football Fixture Calendar or a Concert at the London Stadium arranged after events are fixed for the Sphere or a late finish to a Matinee. Incorporating assessment of such operational scenarios is required along with the consequential actions that would be taken which need to be understood. Maintaining public safety needs to be the overarching objective at the heart of the ConOps. There should be clarity on the anticipated direction of the MSG Sphere operational response where mutual co-operation cannot be achieved.

Further guidance on other details which should be included in the ConOps is provided at various points below.

**Health effects and Equalities Impact Assessment (EQIA)** – the analysis to date has focused on the health and wellbeing effects as they relate to visitors, but providing little consideration of how existing communities or receptors in the surrounding area would be affected. Increased

congestion, sphere lighting, and potential movement and distraction effects may affect the health and wellbeing of the wider community and neighbourhood amenity.

There is also limited consideration of these effects on mental health, particularly for more vulnerable receptor populations, resulting from the impacts stated above. On a related point, there is still ambiguity on how health receptors have been defined as it is still not clear what the health effects on specific receptors are and therefore how those receptors are affected. For example, the sheltered accommodation at Holden Point, was identified in our previous Regulation 25 request (dated August 2019) but is not mentioned in the health assessment.

Health and wellbeing effects for existing receptors needs to be incorporated in the scheme assessment which will be need to be updated to take into account any likely effects resulting from the updated transport and crowd modelling, light spill information and potential changes this may have on effects for other related disciplines.

The Equalities Impact Assessment provides a detailed and comprehensive baseline but there are a number of gaps that are not currently included in the assessment. These gaps are in addition to those mentioned above for health. There may be others as a result of the updated assessment of operation effects. The Equalities Impact Assessment has an interface with the Environmental Statement and so should be updated taking to account the comments above and the result of updated assessment. The conclusions of this document should be considered as part of any updated Environmental Statement.

**Townscape, Built Heritage and Visual Assessment (TBHVIA)** – a detailed review of the assessment methodology undertaken by our specialists (which we have already provided to you) has concluded that the TBHVIA does not provide a reliable assessment of all likely significant effects of the proposed development, is not technically robust and has not been carried out in accordance with the relevant guidance.

The verified views do not sufficiently represent the updated façade material, nor likely effects from light spill, upward sky glow or atmospheric conditions. It will be necessary to explore how this can be resolved in terms of assessment. Historic England have submitted an objection on this basis. Clarity on the environmental effects and assessment methodology is necessary to ensure there is a robust basis on which we can make a determination as to the effects of the scheme on townscape, visual amenity and the setting of built heritage assets. The TBHVIA and visualisations should be amended to include an assessment the proposed alternative façade material.

**Sphere façade, its lighting, operational controls and related environmental effects** – the analysis has highlighted the need for further information and clarifications on the strategy



proposed to control façade luminance/illuminance and manage the display of content in order for us to be able to assess the effects on residential outlook and amenity, community health and wellbeing, habitats and fauna and public safety with regard to potential movement and distraction effects. Changes in atmospheric conditions, seasonal variations and the reflectivity of urban fabric are also likely to impact the assessment of these environmental effects and should be considered.

Clarity is also required on the likely environmental effects of the materials proposed to protect the LED diodes when in operation. This should be reviewed with our specialists. It may be necessary to undertake further testing but if this is not feasible greater clarity and reassurance will be needed to explain why there are no potential gaps in the current glare assessment.

There is also the potential for impacts on habitats and fauna, including bats, not currently scoped into your assessment. Analysis of the information received to date suggests that light may extend above the sphere at a height that may trigger the need to revisit the Habitats Regulation Assessment for Epping Forest Special Area of Conservation/Ramsar and consult again with Natural England once the addition sky glow and light spill information has been prepared. It is unlikely that these discussions can take place until we have received acceptable sky glow and light spill information.

The new information brought forward indicates that there is likely to be a significant effect on visual receptors. A Residential Visual Amenity Assessment (RVAA) should be undertaken. The assessment should be undertaken in accordance with guidance prepared by the Landscape Institute (2019). A study of the likely effects on residential outlook should also be provided (the parameters of which we have previously issued to you in January 2020). The scope and methodology of the RVAA and outlook study should be agreed in consultation with our officers and specialists. It should explicitly provide visualisations of views from private dwellings near to the site and capture in-combination environmental amenity effects resulting from the construction and operation of the development. The assessment should include representative views from adjacent buildings and include Holden Point.

The response to public consultation shows that in addition to potential illumination effects, there is a concern that the development has the potential to be used to display material with different effects on visual and public amenity including, for example, the potential for a series of intrusive images at a scale that would negatively impact on the character of the area to the detriment of visual and public amenity. Advertising at the scale proposed is unprecedented. The acceptability may well depend on what assurance can be provided about the integrity and quality of the Sphere display operations and the strategy that will drive the decisions relating to the display of content.

We recommend the submission of a strategy that sets parameters that would be secured as a planning obligation in the event of the development being permitted. The strategy should explain how the operator will seek to strike an appropriate balance between the building being used to display 'digital art' and what typically is described as commercial adverts. The proposal for advertising content at 50% of the time has not provided the level of comfort required to give reassurance that this control is meaningful in the absence of any description of how it would be used during these times.

The strategy should explain how the intended audience and local stakeholders will be able to measure how close or how far the management of the Sphere display is from achieving its stated objectives. The overarching vision should create a picture of the future state of the building and parameters that could be used to achieve this. Clear objectives should be established beyond the measures stated in current proposals and would allow the reader to have a sense of the future operational use of the displays and confidence that there is a robust framework that can be used to monitor and measure how close or far we are from the stated objectives.

This would help allay concerns about the effects of the screen on residential amenity and community health; the effect of sub-optimal screen resolution on the amenity of residential occupiers whose windows fall outside the 'optimum' viewing range and face directly onto the site; achieving the optimum balance between light intrusion, the quality of images, glare and contrast to the surrounding light; the effect of spill light on CCTV capture within and beyond the site; the performance of the proposed LED technology at ILP curfew lux levels as the quality of images was demonstrably compromised at 6cd/sqm based on our site visit where banding and clipping of the low end of the colour scale during transitions between clips was observed. It was reassuring to see the proposed system can reach a low luminance level at 16 cd/sqm as this could potentially be used as the standard setting in the evening.

The strategy should enable stakeholders to be satisfied that the operational controls have been designed in a way that allows the operator and stakeholders to meaningfully monitor effects on the multiple receptor groups of interest. To the extent that it does minimise uncertainty about how the building is used, it could potentially provide some reassurance that the integrity of operations and operational effects are balanced to achieve a requisite and measurable standard of amenity.

**Distraction effects on rail drivers and road users (Public safety)**– the analysis shows that there remains a potential risk of driver distraction for both rail drivers and road users and that further work is needed in this area. More generally, there is no explicit consideration of the distraction effects of the building façade or how the potential for distraction might be assessed or monitored. Distraction risks should be assessed, in consultation with officers, our specialists the local highway authority and rail operators.

It remains the case that it may not be possible to eliminate all potential distraction risks owing to the novel nature of this scheme. It is therefore considered to be in the public interest that the ConOps is developed further to include a framework setting out how the Sphere and advertising displays would be managed in the interest of public safety and human welfare owing the level of uncertainty.

Consensus should be reached with rail operators and the highways authority in the first instance to define the operational scenarios where either the rail operators or the local authority may need to assume control, or require your client to turn the Sphere display (s) off or on stand-by mode. Further consultation with these parties should be undertaken. Agreement should be reached on the appropriate mechanism to achieve this as a matter of priority. The arrangement will need to be enforceable and robust.

**Connectivity** – our view remains that the design of the podium scheme has not optimised site legibility. Critical lines of sight are obscured along the route between Angel Lane and the town centre link bridge at key locations and we consider the width of space along this route is likely to be narrower than suggested owing to the position of supporting columns and the LED façade protection rail.

We consider there is scope to improve site legibility by pulling back the upper podium deck at pinch points and targeting localised design interventions along this route focusing on the configuration of the deck staircase and lower part of the eastern sphere façade. This should be explored as, in our view, it could deliver a wider, more pleasant and legible through route improving the circulation experience for visitors to the building and consequently the experience of background users living and commuting to and from the town centre. Responding to the site context in this way, on what is arguably the most important connection created, would be a significant planning benefit and support the sites place-making function.

There remain concerns that the combination of gates and restrictions as proposed in the Section 106 would limit public access to the site. For example, under the current draft section 106, closure of this route would be permitted from 20:00 Monday to Sunday if there were no events or premises open on the Podium site. The route should remain open and free to use and offer the highest level of public access. Restrictions should be limited to exceptional circumstances. This underlines the point that connectivity should be reviewed more broadly with the main aim being to minimise restrictions and improve public access.

**Inclusive Access and Drop-off and pick up** – No visitor blue badge parking is proposed on-site which remains problematic. Issues regarding the operation of mobility assistance and pick-

up and drop-off have also not been fully addressed. The alternative may be to provide a satisfactory 'Plan B'.

The London Borough of Newham has maintained their objection to the proposed event day disabled spectator drop-off locations. Agreement on locations should be explored with the Local Highways Authority particularly if they are being relied upon to deliver the updated mobility access strategy. In any event, a 'fly through' of the routing options for 'blue badge' visitors from arrival to departure should be provided to enable us to assess the acceptability of the proposed arrangement.

Inclusive design is important and an LLDC priority. We welcome clarity on the internal arrangements of the main building which we discussed previously at validation. Details should be provided clarifying which parts your client is prepared to fix at this planning stage and the reasons where your client considers itself unable to provide sufficient commitment on plan.

**Highways impacts** – Concerns regarding the robustness of highway modelling due to issues over baseline data and uncertainties over the impact of the changed traffic arrangements in Stratford Town Centre remain, but appear to be potentially resolvable with conditions requiring monitoring and as necessary updating of traffic signal timings and/or phasing. This does, however, need to be explored in greater depth as a number of junctions are highlighted in the TA as having additional congestion.

The detailed design of Montfichet Road and Angel Lane works need further review to ensure they are safe and offer sufficient priority to vulnerable users. The Built Environment Access Panel underlined this point and so the impacts of the revised design in the context of the new station entrance need to be better understood.

**Air Quality Neutral Assessment** – Clarity should be provided on the Benchmarks and floorspace assumptions reported within the Environmental Statement. The site should be assessed on the basis that it is an inner London Borough. It appears to have been assessed as an Outer London Borough. You have provided an update which we shall review in due course in consultation with the London Borough of Newham.

**S106 obligations and planning condition** – We can move forward in the areas where we have reached agreement and expect we can agree a programme for achieving this in the updated PPA. However, it is evident that some principal environmental matters of interest – light and transport - remain unresolved and so it is unlikely that meaningful progress can be made in areas affected by these on-going workstreams in the absence of the further information and assessments awaited. I'm also mindful that once the assessment work is completed we will need sufficient time

to review the material and consult with our specialists and third parties. This has been a huge undertaking to date, and I express caution that this will be no different in the current climate and subject to the unprecedented effects of it.

Finally, I think we have to reasonably acknowledge the impact that the current COVID-19 emergency restrictions and measures are likely to have on the programme, both practically in terms of information production, peer review and consultation, but also decision making. The LLDC has not been captured in the recent emergency legislation in relation to public meetings and as such for the interim we are seeking Board approval to extend delegation of decisions on those items usually reported to PDC, to either the Chair of the Committee or the Director of Planning Policy and Decisions. As indicated previously, I suspect that even if such powers are agreed to be delegated, there is likely to be some concern about taking decisions on what might be perceived to be contentious or controversial planning applications during such a period where decisions are being taken under delegation rather than by the Planning Decisions Committee. I will of course keep you updated on this, but this is a very real matter which needs to be considered in our programme discussions.

I trust this letter helps to clarify the key issues as we currently see them and what we need to resolve in order to reach planning committee. Once you have had an opportunity to consider the points above, I would welcome a discussion on how you propose we incorporate these requirements into a revised PPA.

Yours sincerely,



**Anthony Hollingsworth**  
Director of Planning Policy and Decisions  
London Legacy Development Corporation

**From:** s.40  
**To:** [Daniel Davies](#)  
**Cc:** s.40; s.40  
**Subject:** Reg 25  
**Date:** 14 May 2020 13:56:51  
**Attachments:** [Draft Reg 25 Letter May 2020 Arup 0.2 Jacobs 140520.docx](#)

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Dan

Attached is a draft of the Transport section for the Reg 25. I have included it into an early version of the Arup letter and Reg 25 items.

Regards

s.40 | [Jacobs](#) | Director of Transport Planning  
M: +44 (0) s.40 | s.40 | [@jacobs.com](#)  
Cottons Centre Cottons Lane | London SE1 2QG | United Kingdom  
[www.jacobs.com](#) | [LinkedIn](#) | [Twitter](#) | [Facebook](#) | [Instagram](#)

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**From:** [Daniel Davies](#)  
**To:** s.40; [Chris Goddard](#); s.40; s.40; s.40  
**Cc:** s.40; s.40; s.40; [Catherine Smyth](#); [Anthony Hollingsworth](#); s.40  
**Subject:** MSG Sphere (19/00097/FUL) - Regulation 25 Request for Further Information  
**Date:** 20 May 2020 18:09:01  
**Attachments:** Extracted - not relevant  
Extracted - not relevant  
[March 2020 Jacobs update with Summary.pdf](#)  
[MSG Sphere Reg 25 Letter May 2020.pdf](#)

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Dear s.40

Further to our discussion earlier, please find attached a letter setting our request for further information in relation to the MSG Sphere planning application.

Happy to discuss if you have any questions. The contents of the appended supporting reports are the same as previously issued.

Best wishes,

**Daniel Davies**  
**Principal Planning Development Manager (Planning Policy and Decisions Team)**

London Legacy Development Corporation  
Level 10  
1 Stratford Place, Montfichet Road  
London  
E20 1EJ

DD: 020 3288 s.40  
Mob: s.40  
Email: [danieldavies@londonlegacy.co.uk](mailto:danieldavies@londonlegacy.co.uk)

*I work flexibly, so while it sometimes suits me to email outside of normal working hours, I do not expect a response outside of your own.*



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# MSG Stratford Sphere – Status of Traffic and Transport Concerns and Outstanding for Resolution

March 2020

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1. This note considers the issues raised in the Jacobs note of August 2019 (MSG Sphere – High Level Review of Traffic and Transport) and whether these have been addressed satisfactorily in the applicant’s subsequent Regulation 25 submission or otherwise in discussions with the applicant team. The note also considers whether the further information submitted or discussions on that submission raise any additional issues.
2. This note is structured in the same way as the August 2019 note by broad topic.
3. *As a general comment, it should be noted that it is envisaged that a high proportion of potential adverse effects will be mitigated through management and operational measures such as shifting start/finish times or limiting attendance that require greater definition and certainty of delivery and effectiveness.*
4. Alongside changes to assumptions in the analysis, the Reg 25 submission also includes the proposal for a new entrance to Stratford Station from Montfichet Road. While the new entrance has been assumed as mitigation for the effects of the scheme, *there remains significant design issues that need to be addressed to demonstrate that the new entrance is a practicable intervention and supported by the station owner/users.*
5. An issue not addressed in the updated assessment is the potential need for a ‘future year’ model. On one hand, given the already committed and expected growth in the area the lack of a future year forecast understates the expected level of crowding/congestion on the Stratford transport networks. Conversely, if proposed mitigation achieves a ‘nil detriment’ position in the base year that could equally translate to avoiding a future year being any more congested than it would otherwise be then an argument can be put that the proposal does not adversely affect the transport networks.

## Environmental Statement

6. The omissions raised in the Reg 25 request have been addressed. This includes issues such as missing assessment and consideration of additional scenarios – notably for smaller locally focussed events. However, *the presentation of station travel time impacts needs clarification to recognise the multiple groups affected by the same adverse impacts and clarification is needed of the extent to which the assessment of station congestion omits to highlight areas that are worse than the ‘average’.*

## The Transport Assessment

### **Methodology**

7. The issues raised have been addressed with revised, agreed trip distributions used in the Reg 25 response. However, as noted below, *the methodology used to assign trips to the rail network has resulted in a lack of clarity as regards detailed localised impacts on Stratford Station and on line loadings. This lack of clarity needs to be addressed, either through clear signposting and clarification or through updated consolidated analysis.*



8. In addition, the revised analysis has highlighted the risk that visitors to a full capacity matinee event would use Stratford Station at the same time as arrivals for an evening event. This would potentially result in a higher peak impact than is assessed and reassurance is needed that either this is not a material concern or that it can be mitigated by, for example, reducing capacity or altering event times.

#### ***Trip Generation***

9. Concerns regarding arrival and departure profiles have been addressed, including profiles when start times are altered. For certain scenarios, however, the need to 'mix-and-match' between the original assessment and the Reg 25 information introduces uncertainty regarding what assessment should be referenced and whether there are any consequent mis-matches. As noted, ideally a consolidated updated assessment would address this issue.
10. Mode share concerns have generally been addressed (and overnight events that introduced most concerns removed). However, issues regarding the use of other routes, notably to Maryland, have not been fully resolved.
11. The Line distribution concerns have been partly addressed through the new analysis. However, as above the need to 'mix-and-match' *between assessments for line capacity issues adds uncertainty.*

#### ***Assessment Scenarios***

12. Issues raised have generally been addressed, but as noted *the potential overlap of matinee and evening events requires further clarification.*

#### ***Impact on the Highway Network***

13. Concerns raised in the Reg 25 regarding the robustness of highway modelling due to issues over baseline data and uncertainties over the impact of the changed traffic arrangements in Stratford Town centre remain but *appear resolvable with Conditions requiring monitoring and as necessary updating of traffic signal timings and/or phasing. This does, however, need to be explored in greater depth as a number of junctions are highlighted in the TA as having additional congestion.*
14. *Issues regarding the operation of mobility assistance and pick-up and drop-off have not been fully addressed and seem unlikely to be resolved until a decision on seeking permission to use the HS1 car park is reached – and the impacts of such a strategy better understood.*
15. *Detailed design of Montfichet Road and Angel Lane works need further review to ensure they are safe and offer sufficient priority to vulnerable users.*

#### ***Car Parking***

16. Concerns raised in the Reg 25 have been addressed other than the issue of use of the HS1 car park – and associated issues of provision for mobility assistance. A process for monitoring parking in residential streets by event visitors and, as necessary, implementing additional controls needs to be defined.
17. It should be noted that car park departures are forecast to occur at capacity over a very extended period.

### ***Impact on the Pedestrian Network***

18. The Reg 25 response clarifies many issues of impacts on the pedestrian network. It remains the case that the analysis, perhaps inevitably, assumes highly directed visitor routing. The results need to be considered in the context that this is unlikely to be fully realised (for example with visitors using the Northern Ticket Hall even if the new Montfichet Road entrance is introduced).
19. It also remains the case that venue visitors will in some circumstances be held for extended periods on the venue podium to avoid over-loading the station. The impact of visitors choosing alternative routes to avoid the consequent delays needs to be taken into account.
20. The impact on the pedestrian (and cycling) environment on Montfichet Road of the proposed new station entrance has not been addressed.
21. Public access across the Podium and restrictions on this also remain to be resolved.
22. Effective management (or deterrence) measures for users seeking to use Maryland station need further development to provide assurance.

### ***Impacts on Rail Services***

23. The issues raised in the Reg 25 have generally been responded to. As noted, it is necessary to combine the original and revised assessment to get a complete picture of the impacts. This is not entirely convincing as it is difficult to know whether it provides a full and robust picture, particularly as there are a range of differences in assumptions between the two assessments.
24. This means that there is not clarity regarding line loadings and, in particular the likelihood of full trains meaning that background users are unable to board – or suffer high levels of crowding.
25. While the proposal is to address capacity and congestion impacts through measures such as event timing or capacity, it is unclear how this could be fully effective (or practicable) in all circumstances. Of most concern, because of the potential frequency, is the potential over-loading of the Jubilee line when there are capacity events at both Stratford Sphere and the O2. In addition, it appears there may be issues for Central Line late night capacity in certain scenarios but, because of the partial line-loading analysis in the Reg 25 response, it is difficult to know whether there would be sufficient capacity on the Elizabeth line to accommodate the westbound travel demands
26. It is also apparent that certain lines could *not accommodate demand for late night departures before services wind down. In so far as there are many alternative routes for most journeys it needs to be determined whether this is or is not acceptable. The general situation over capacity for late night finishes (00.15 Friday-Saturday and 23.30 at other times – and for the music venue) needs further clarification as capacity appears very limited as a result of many services stopping operating.*

### ***Impacts on Stratford Station***

27. A number of the issues raised have been addressed. In particular it is now possible to see the change in station performance with the Stratford Sphere in operation (though comparing the with and without scenarios is awkward). The Reg 25 request did not attempt to identify specific performance concerns. Again, as noted, the need to combine the two assessments complicates identification of the issues. *While the new Montfichet Road entrance offers the potential to reduce any adverse impacts on congestion due to the Sphere and also add capacity to the station generally, there remain a number of pinch-points and areas vulnerable to increased*

*congestion. As might be expected the new entrance reduces crowding in some areas to below 'baseline' but in other areas it will worsen. The degree to which this represents in aggregate a reasonable balance needs to be agreed by stakeholders. In any case, acceptability to the station operators/owner of the new entrance has yet to be confirmed.*

#### ***Impacts on Hub (Remote) Stations***

28. While the request for further, more structured and detailed information on the impacts on remote stations has been addressed, *this has not provided clarity on the acceptability of the impacts at remote stations or any need/potential for mitigation.*

#### ***Impacts on Cycling***

29. The Reg 25 response provides greater assurance regarding adequacy of cycle parking. However, a Condition is needed to ensure that sufficient cycle parking is available if monitoring shows it is required.
30. While the detailed arrangements for cycling on Montfichet Road has been the subject of debate (as indeed has the overall arrangements), *the impact on cycling of the introduction of the new station entrance has not been addressed This is essential as part of the decision on the new entrance.*
31. *The impacts on LBN's proposals to enhance cycling facilities on Angel Lane also need to be better understood.*

#### ***Impact on Buses and Coaches***

32. Subject to satisfactory assurance regarding minimising disruption to operation of buses (from closure/relocation of facilities, diversion of route or delays due to traffic congestion), issues regarding buses have generally been addressed.
33. The position is similar for scheduled coaches, but there is a concern regarding the convenience of the relocated coach stops on Montfichet Road.
34. For coaches serving the venue, clarity is still needed of how coach drop-off and pick-up would be provided that takes into account a *firm proposal for car/taxi pick-up and drop-off.*

#### ***Impacts on Taxis and Private Hire***

35. The Reg 25 requests were addressed. *However, the arrangements for car/taxi pick-up and drop-off need to be fully defined (including any use of the HS1 car park) and will need to be carefully managed to avoid disruption to neighbouring communities and increased congestion.*

#### **Mitigation**

36. Mitigation proposed involves three elements: physical scheme measures, event/crowd management; and adjustments to event timings or capacity.
37. The detailed analysis sets out (or will set out) the impacts of the physical measures on the basis of broadly agreed assumptions. There are, nonetheless, numerous details that need to be resolved, not least the practicability/acceptability of the proposed new Montfichet Road station entrance.
38. The event and crowd management proposals/assumptions are currently highly prescriptive and potentially overlook the likelihood that visitors will not all follow the 'rules'. In some cases, this may reduce adverse impacts but equally in others it may introduce new concerns.

39. Changes to event times and capacity are particularly relevant to Sphere events clashing with Stadium events, the mechanisms for achieving this and the constraints on it need to be understood better, particularly as to whether it can be guaranteed or the frequency/likelihood of conflicts occurring that cannot be managed through such measures.

### Summary

40. This note sets out the key issues for clarification or additional information. In a number of areas this has the potential to result in new information that would be the subject of Reg 25 consultation. The key issues and actions expected are:

Issue	Actions required	Potential to result in new environmental information
Need to review combination of both original and Reg 25 assessments of Stratford Station to reach conclusions. This covers the proportion by line of Sphere visitors and overlap of matinee and evening events. This has consequent risks of mismatch and lack of robust assessment of station impacts.	Undertake revised Stratford station assessment that resolves inconsistencies	High
Line capacity: The partial reporting in the Reg 25 assessment results in a lack of clarity on available capacity. This makes it difficult to judge, in particular late night capacities and the acceptability of event finish times.	Clarification of loadings on all rail lines.	Likely to be clarification
Car parking (incl. Blue Badge), drop-off and pick-up need clarification and greater detail in the context of proposals to use the HS1 car park. Without this the effects are very difficult to be certain of.	Formal proposal for use of HS1 car park and/or alternative proposal if this remains uncertain.	Given dependency on HS1 car park, that needs to be understood and the Sphere application made dependent upon planning approval for it. Alternative is to provide a satisfactory Plan B.
Driver Distraction – TRL report expresses concerns and these need to be addressed	Response to TRL report required and potential management process to ensure adverse effects not realised.	Critical to resolve but unlikely to be new environmental information.
Event coincidences: The current proposals give limited reassurance that event coincidences would be manageable. On some occasions Sphere and O2 events seem inevitably to coincide but mitigation of impacts on the Jubilee line need clarification. Similarly the detail of coordination with	Detailed discussion needed on the practical working of changing event times and capacity and to identify and justify capacity thresholds/triggers	Critical to resolve but unlikely to be new environmental information.

Stadium need development to give reassurance.	for different management actions.	
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41. There are further issues to resolve such as the detailed design of Montfichet Road and Angel Lane and impacts on remote stations. However, unless these identify the need for further mitigation or scheme design changes these should represent on-going detailed design/review.

Chris Goddard  
100 Pall Mall  
London  
SW1Y 5NQ

By email

**20 May 2020**

Dear Chris,

**REQUEST FOR FURTHER INFORMATION PURSUANT TO REGULATION 25 OF THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017, AS AMENDED.**

**Application reference: 19/00097/FUL**

**Applicant: Stratford Garden Development Limited**

**Location: Land lying to the west of Angel Lane, Stratford, London, E15 1AA.**

**Proposal: Detailed planning permission is sought for the following:**

**“Development of a multi-use entertainment and leisure building comprising sphere, terraces, podium, plaza, ground and basement levels with an illuminated external display (sui generis use including flexible entertainment, assembly and leisure venue with an illuminated internal display, music venue, restaurant / members’ lounge / nightclub, bars, restaurants, cafés, retail and merchandising, hospitality and catering facilities, box office, security facilities, rehearsal spaces, back of house event facilities, offices, storage, vehicle parking, servicing and loading, external terraces with landscaping and café, bar, retail and open air entertainment facilities, and all supporting and complementary facilities for such 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 and other works incidental to such development.**

We write with reference to the above planning application and accompanying 'MSG Sphere Environmental Statement' dated November 2019, prepared by Trium ("Environmental Statement" or "ES"). The application was submitted together with an application for advertisement consent (reference 19/00098/ADV) The London Legacy Development Corporation Planning Policy and Decisions Team (LLDC PPDT) is of the opinion that further information is required to assess this scheme for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, as amended ("EIA

Regulations"). As such this letter is a request for further information pursuant to Regulation 25 of the EIA Regulations

A table is attached which summarises the items we consider are "further information" as specified in Regulation 25 in the middle column. The right-hand column summarises items in respect of which clarification is sought. Further detail on each item listed is set out in the appended reports prepared by Jacobs and Arup respectively:

- Status of Traffic and Transport Concerns and Outstanding Matters for Resolution— prepared by Jacobs dated March 2020;
- Environmental Statement High Level Review – prepared by Arup dated February 2020; and
- Environmental Statement – High Level Summary of Outstanding Information (Memorandum) prepared by ARUP dated April 2020

Notwithstanding the attached summary table, the Applicant's response should address all of the further information requests and requests for clarification contained within previous correspondence.

Where any further information necessitates amendments or updates to assumptions, modelling and scenarios the Applicant should consider if this will result in any changes to related Environmental Statement topic areas.

The availability of further information provided pursuant to Regulation 25 will be advertised and we will also write to statutory consultees, as required under the EIA Regulations.

The LLDC PPDT would welcome the further information and matters for clarification to be provided by way of an update to the ES or an addendum to the ES. If the Applicant proposes to submit an updated ES it would be helpful for the further information and clarifications to be shown either with a clear explanation of the principal changes at the start of each chapter/section or in track changes/redline for ease of identification. A similar approach should be adopted for supporting documents.

Where the Applicant considers that such

- (i) further information; or
- (ii) clarification on any matter,

is unnecessary or has already been satisfactorily provided, the Applicant should provide full details in its response to the relevant request.

Where the LLDC PPDT considers that Regulation 25 further information or any clarificatory information that is received from the Applicant is inadequate, LLDC PPDT reserves the right to make additional Regulation 25 requests.

The determination of the Application shall be suspended pursuant to Regulation 25 (7) of the EIA Regulations and shall not be determined before the expiry of 30 days after the latest of:

- (i) the date on which the further information or any other information was sent to all persons to whom the Environmental Statement was sent;
- (ii) the date that notice of it was published in a local newspaper; or
- (iii) the date that notice of it was published on LLDC's website.

I would be grateful if you could confirm in writing as soon as possible your intended timescale for submitting the information requested.

Please do not hesitate to contact Daniel Davies should you have any questions or wish to discuss the matter further

Yours sincerely,



**Anthony Hollingsworth**

Director of Planning Policy and Decisions

For London Legacy Development Corporation Planning Policy and Decisions Team

Enclosed:

- **Status of Traffic and Transport Concerns and Outstanding Matters for Resolution**— prepared by Jacobs dated March 2020;
- **Environmental Statement High Level Review** – prepared by Arup dated February 2020; and
- **Environmental Statement – High Level Summary of Outstanding Information (Memorandum)** prepared by ARUP dated April 2020



<b>ES Chapter 6 (Highways, Transport and Movement) and Transport Assessment</b>		
<b>Topic</b>	<b>Regulation 25 Requests for Further Information</b>	<b>Requests for Clarification</b>
Stratford Station Impacts	<ul style="list-style-type: none"> <li>The revised assessment provides a partial view of the impacts and relies upon combining the initial and revised assessments to provide a full picture. However, these two assessments use different assumptions. An updated consolidated assessment of station impacts using the same assumptions is required, including addressing the potential overlaps between matinee and evening events.</li> </ul>	<ul style="list-style-type: none"> <li>The presentation of the impacts on changes to in-station travel times needs clarification to bring together users on common routes and clarify the number of users affected.</li> </ul>
Crowd Modelling		<ul style="list-style-type: none"> <li>The potentially higher peak impacts at Stratford Station are likely to give rise to impacts on the wider pedestrian network. As such, updated crowd modelling showing the impact of the higher peak should be provided. Ideally the station and external pedestrian modelling would be directly linked to demonstrate clearly any effect interactions. However, if this is not feasible an improved explanation of how the two models do link together and a reasoned assurance as to why you consider that there are no potential gaps in the assessment should be provided.</li> </ul>
Line capacity		<ul style="list-style-type: none"> <li>The partial reporting of line loading in the revised assessment results in a lack of clarity on available capacity. This makes it difficult to judge, in particular, late night capacities and acceptability of start/finish times. This assessment requires clarification.</li> </ul>
Parking and Drop-off/ Pick-up	<ul style="list-style-type: none"> <li>The Proposed use of the Stratford International car park needs to be formally linked to the application or a clear and robust alternative presented.</li> </ul>	<ul style="list-style-type: none"> <li>Further detail is needed of the operation of drop-off and pick-up to clarify the proposals and demonstrate all impacts have been identified.</li> <li>Mobility Assistance: further detail of its operation and interactions with visitors or the wider public realm is needed to clarify impacts</li> </ul>
Driver distraction (Road and Rail)	<ul style="list-style-type: none"> <li>The road user assessment provided is not considered robust and needs to be enhanced to address concerns expressed by LLDC, its consultants and stakeholders.</li> </ul>	<ul style="list-style-type: none"> <li>We need clarity on the acceptability of rail distraction to Network Rail and rail operators. Ideally further information should be provided to demonstrate that distraction risks have been appropriately assessed.</li> </ul>

<b>ES Chapter 6 (Highways, Transport and Movement) and Transport Assessment</b>		
<b>Topic</b>	<b>Regulation 25 Requests for Further Information</b>	<b>Requests for Clarification</b>
		However, if this is not feasible a reasoned assurance as to why there are no gaps in the current assessment should be provided and clarity on whether any additional mitigation is required to minimise or monitor likely effects.
Event Coincidences and Coordination		<ul style="list-style-type: none"> <li>Greater clarity on the operation of the Concept of Operations and how it would ensure effective management of events, coincident events and coordination with the London Stadium and other events is required to give assurance of its likely effectiveness.</li> </ul>
New Station Entrance and Montfichet Road		<ul style="list-style-type: none"> <li>Greater clarity on the proposed new Entrance on Montfichet Road, including the impact on Montfichet Road, addressing technical issues and acceptability to rail operators is required.</li> <li>Clarity is required as to any impacts of introducing the new station entrance on the design proposals for Montfichet Road, including cycle routeing</li> </ul>
Junction modelling		<ul style="list-style-type: none"> <li>Clarification is needed as to how concerns regarding junction traffic impacts will be addressed.</li> </ul>

<b>Environmental Statement (excluding Transport)</b>		
<b>Topic area</b>	<b>Regulation 25 Requests for Further Information</b>	<b>Requests for Clarification</b>
Townscape, built heritage, visual impact	<ul style="list-style-type: none"> <li>Provide an assessment of the likely effects on residential visual amenity of surrounding residents, in accordance with the Landscape Institute guidance, as a result of light intrusion and the scale/proximity of the proposed development.</li> </ul>	<p>Clarify the following:</p> <ul style="list-style-type: none"> <li>the assessment approach to visual susceptibility;</li> <li>the method for assessing sensitivity and magnitude of change/ scale of effects for townscape, built heritage and visual effects;</li> <li>how the local townscape character areas and townscape receptors have been derived;</li> <li>how the visual receptors, including residents, have been identified and assessed;</li> <li>the likely effects on townscape character, built heritage and visual receptors as a result of light;</li> </ul>

<b>Environmental Statement (excluding Transport)</b>		
<b>Topic area</b>	<b>Regulation 25 Requests for Further Information</b>	<b>Requests for Clarification</b>
		<ul style="list-style-type: none"> <li>the likely effects on the setting of heritage assets during night time, winter and when the sphere is in operational mode; and</li> <li>the likely townscape, built heritage and visual effects as a result of the revised façade material.</li> </ul>
Socio-economics	-	-
Human health	<ul style="list-style-type: none"> <li>Clearly define and distinguish the specific health determinants, receptors and receptor populations, and specific vulnerable groups, including Holden Point. Assign appropriate sensitivities and magnitudes of impact for health.</li> <li>Assess the likely health and wellbeing effects on specific health receptors, receptor populations, including specific vulnerable groups and children, and neighbourhood amenity, as a result of light, visual effects/disturbance and movement/ distraction.</li> <li>Assess the likely health and wellbeing effects relating to public transport capacity impacts on health determinants for existing receptors living/working in the study area for the health assessment. The assessment should consider physical crowd movement/dispersal, potential noise/anti-social behaviour and increased traffic flows. The health assessment should also take account effects as a result of the updated transport and crowd modelling potential changes this may have on effects for other related disciplines such as noise and air quality.</li> <li>Assess the likely effects in relation to mental health, particularly for specific vulnerable groups and children, as a result of public transport capacity impacts, light, visual effects, movement and distraction.</li> <li>Ensure any effects identified in the Equalities Impact Assessment are considered within the health assessment, where relevant.</li> </ul>	-

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	<ul style="list-style-type: none"> <li>Consider the findings of the Equalities Impact Assessment, where relevant.</li> </ul>	
Noise and vibration	-	<ul style="list-style-type: none"> <li>Clarify the likely noise effects as a result of the updated transport and crowd modelling and the proposed use of Stratford International Car Park.</li> </ul>
Air quality	-	<ul style="list-style-type: none"> <li>Clarify the likely air quality effects as a result of the updated transport and crowd modelling.</li> <li>Clarify the benchmarks and floorspace assumptions applied to the air quality neutral calculation.</li> </ul>
Wind microclimate	-	-
Daylight, sunlight & overshadowing	-	-
Light intrusion, upward sky glow and light spill	<ul style="list-style-type: none"> <li>Prepare illuminance contour plans for a white sphere and typical moving image to demonstrate levels of illuminance and light spill at sensitive receptors and at varying heights above the sphere. The assessment should consider how it complies with the updated ILP Guidance 2020 and include an assessment of luminaire intensity at potentially obtrusive directions beyond the site boundaries.</li> </ul>	<ul style="list-style-type: none"> <li>Provide luminance plans with varying nit/candela levels to clarify how far light intrusion/light spill at nearby sensitive receptors can be minimised. Plans to include window reference maps.</li> <li>Clarify how the proposed luminance of the sphere compares to other existing similar venues, such as an open-roofed sports stadium.</li> </ul>
Solar glare	-	<ul style="list-style-type: none"> <li>Clarify the materials used to protect the LED diodes when in operation. Further testing may be required if these materials have not been included within the assessments.</li> </ul>
Geo-environmental	-	-
Cultural heritage (archaeology)	-	-
Ecology (biodiversity)	<ul style="list-style-type: none"> <li>Confirm the likely effects on habitats and fauna, including bats, moths/insects and migratory birds, as a result of light and sky glow. Discussions may need to be undertaken with Natural England with regards to the Habitats Regulation Assessment</li> </ul>	-

<b>Environmental Statement (excluding Transport)</b>		
<b>Topic area</b>	<b>Regulation 25 Requests for Further Information</b>	<b>Requests for Clarification</b>
	for the Epping Forest Special Area of Conservation once the updated sky glow information is available.	
Water, Flood Risk and Utilities	-	-
Effects interaction – residential amenity	-	<ul style="list-style-type: none"> <li>Clarify the effects on residential amenity of specific receptors and residents surrounding the proposed development. This should be informed by the residential visual amenity assessment and consider the cumulative impact of other relevant technical disciplines.</li> </ul>