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Dear Jules

Thank you for sending me the Transport for London review of the Fish Island Bridges. It is disappointing that the review did not include a comprehensive look at the overall area and proposals, and that alternative options have not been considered.

Having reviewed this document, I am still of the firm opinion that opening H14 to all traffic and demolishing part of Vittoria Wharf to build the H16 bridge is not in line with the aspirations of the Mayor's draft Transport Strategy or his Economic Development Strategy.

The main purpose for the new pedestrian/cycle H16 bridge appears to be to serve as a crossing during the construction of H14. This lacks coherence, particularly as it involves the unnecessary part demolition of Vittoria Wharf and destruction of much needed affordable workspace.

I would be grateful if you would respond to the comments and questions which are set out after the relevant paragraphs from the TfL review below.

With best wishes

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H14 bridge

Paragraph 1.2 'These bridges are intended to provide connectivity to help reduce severance and stitch communities together to maximise access to the facilities and developments in the Queen Elizabeth Olympic Park (QEOP).'

Q 1. Did you model options to limit traffic by disallowing certain forms of traffic over White Post and reducing car parking or insisting on car free development at Sweetwater and Eastwick developments?

Q 2. In the hierarchy of the criteria used for your review, where does connectivity sit compared to increasing capacity at other junctions?

Paragraph 1.3 'The proposals were passed at the LLDC's Planning Decisions Committee on 27 March 2017: the Bridge H14 application was passed by eight votes to one and the Bridge H16 application was passed by seven votes to two.'

Comment 1. The LLDC's planning decision vote on the bridges at this meeting is irrelevant to this review. The siting of the bridges could not be considered at the March 2017 planning meeting, only the detail. The principle of both bridges had been established by the Legacy Communities Scheme (LCS), in September 2012 (referred to in para 2.1) and the reserved matters application for these bridges design details was set by the outline planning permission.

Paragraph 1.4 'However, there is some community and political opposition to the proposals.....'

Comment 2. Even though political opponents to the scheme are listed, the scale of opposition is downplayed by the opening sentence "there is some community and political opposition..".

There is no reference to the 6,353 strong online petition against the demolition of Vittoria Wharf <https://www.change.org/p/save-hackney-wick-stop-the-demolition-of-vittoria-wharf>, or the survey (attached) carried out by the local community of the bridges and success of the LLDC's consultation. Of 549 predominantly local respondents, 84.2% said they did not feel they were consulted, 75.4% felt the LLDC did not inform them of its plans in general and 98.3% were against bridge H16.

Paragraph 2.2 'The information submitted as part of the planning applications has formed the basis for the review. The reserved matters application for H14 provides the most recent traffic modelling information, alongside the Technical Note "LLDC Queen Elisabeth [sic] Olympic Park - H14 Bridge Review" dated 8 December 2016 prepared by Arup and the "Environmental Information Report", dated March 2017, prepared by Quod. The latter was prepared in response to a request from Tower Hamlets, with references back to information submitted for the original LCS application.'



Paragraph 4.7 'There is evidence of consideration in the design process to minimise the impacts of the highway infrastructure in the changes made during the planning process. In 2014 a variation to the LCS was approved (ref 14/00036/VAR) which made a number of changes to the original LCS permission including accelerating the delivery of development in Planning Delivery Zones 4 (Sweetwater) and 5 (East Wick).'

Comment 3. The Environmental Report accompanying the accelerated delivery of East Wick and Sweetwater (14/00036/VAR above) highlighted that there have indeed been changes to road vehicle emission factors and that the annual mean NO2 concentrations predicted in 2014 and 2020 are higher than those in the LCS ES for 2021. Notwithstanding, it concluded there would be no difference in the resulting air quality impacts. Given that this conclusion was written in February 2013, it should be revisited for any plans, such as Sweetwater, that have still to be laid out in detail.

Reference from 'Summary and Conclusion AECOM Legacy Communities Scheme Phase 2: Environmental Report', page 95

16.1.2 Air Quality Since the production of the LCS ES there have been changes to the road vehicle emission factors and maps of background pollutant concentrations published by Defra. As a result an air quality review was undertaken to investigate the potential implications for local air quality of the accelerated delivery of PDZ 4 and PDZ 5. The annual mean NO2 concentrations predicted in 2014 and 2020 are higher than those in the LCS ES for 2021. This is primarily due to the higher background concentrations used in the review. The sizes of the impacts associated with the proposed scheme are similar to those in the LCS ES for the consented scheme. The worst-affected receptor locations are the same in both the LCS ES and this review. In comparison with the results of the air quality assessment carried out for the LCS ES the annual mean NO2 and PM10 concentrations predicted to affect PDZ 4 and PDZ5 are, on average, slightly higher in this review. The predicted exceedances of the daily mean PM10 standard are also higher in this review than those presented in the LCS ES. The primary reason for the higher results is the higher background pollutant concentrations used in the review. However, the significances of the air quality impacts associated with the proposed scheme are identical to those reported in the LCS ES. Overall, given the review of the impact of the acceleration of PDZs 4 and 5, the effects are expected to remain the same as that assessed under the LCS ES and Addendum ES.

Comment 4: The principle of both bridges was established by the Legacy Communities Scheme (LCS), in September 2012 (referred to in para 2.1) and the reserved matters application for H14 bridge design details within the approved parameters was set by the outline planning permission. Meaning that the principle of bridges was already established. Therefore the "Environmental Information Report 2017" (Arup) referred to states that it only considers the reserve matters applications (RMAs) for the bridges (paras 1.1.4 and 1.1.5) not the principle of them.

Paragraph 4.11 'TfL has further reviewed this work and confirms that the methodology used including the assumptions, models used and the use of sensitivities is valid and reasonable and consistent with TfL's modelling guidance. The assessment shows that, without Bridge



H14, some of the identified junctions would operate above 90% - which would be over the upper level of practical capacity as set out in the formal TfL guidance.'

Paragraph 4.12 '.....without Bridge H14 the approaches from North Loop Road to White Post Lane (which would be signalised) would operate at above 90%, and in Table 9 that the approaches from North Loop Road to White Post Lane would operate at above 100%.'

Paragraph 4.13 'This situation would also apply if Bridge H14 should operate as a bus, walk and cycle only bridge or walk / cycle bridge as well.'

Comment 5. The operation of the junctions over the limits was only established in the ARUP 'LLDC Queen Elisabeth Olympic Park-H14 Bridge Review' (<http://planningregister.londonlegacy.co.uk/swift/MediaTemp/6554-111564.pdf>) when an additional 20% contingency was added to their findings. The review states that assessments are consistent with TfL's modelling guidelines. However there is no mention in their modelling guidelines around the adding of contingencies in this way.

Q 3. What is the basis for the 20% added contingency? Where in the TfL modelling guidelines is this supported?

Paragraph 4.15 'The Technical Note produced by Arup has also shown that an all modes Bridge H14 would provide resilience to the transport network, spreading vehicle movements rather than concentrating them on White Post Lane.'

Comment 6. In the absence of a full transport review of the overall proposals this conclusion is questionable. The review did not take account of current and future pedestrian and traffic movement or the Mayor's aim in his draft Transport Strategy of traffic reduction and for 80 per cent of trips to be made by bike, foot or bus by 2041.

4.18 'Grampian condition LCS.0194 which doesn't allow any more than 400 units in PDZ4 (Sweetwater) to be occupied until H14 multi-modal bridge is completed and open for use at all times by the general public, and also that a new H16 pedestrian / cycle bridge would need to be in place before existing Bridge H14 is closed / demolished. These would ensure that infrastructure is in place as soon as possible to support the development.'

Paragraph 4.19 'Without delivery of Bridge H14 as an all modes bridge, the development would not be supported by sufficient capacity given the projections of trips arising. '

Q 4. The Grampian conditions appears to be an overriding factor in your decision making. However, variations to the original LCS conditions take place frequently. Are there any legal or planning implications for the LLDC and Mayor of London, if this condition is not met?

Comment 7. The road capacity needed is entirely dependent on the kind of developments planned for Sweetwater and Eastwick.



Comment 8: Given that the Masterplan for Sweetwater was postponed as part of the planning permission for the bridges, the occupation of PDZ4 is years away. Instead of building the bridges with insufficient traffic knowledge, traffic generation information from the soon to be occupied Chobham Manor could be used to inform the Masterplan (as per para 4.23) and the consequent need for the bridges.

Q 5. What is the assumed parking provision in the Sweetwater Development? Was a car free development considered in the modelling?

Paragraph 4.20 'There was an extensive programme of community involvement between 2009 and 2011 for the LCS. For the specific engagement for bridges H14 and H16, there was a consultation programme between March and September 2016, with a range of sessions with LLDC stakeholder groups, statutory consultees, landowners, and neighbours alongside public consultation.'

Paragraph 4.22 'Mayor has looked at the processes and the decisions of the Planning Decisions Committee and is satisfied that procedurally the correct planning process has been followed from consultation to clear decision-making where the reserved matters applications for both bridges were overwhelming approved by Planning Decisions Committee members. Further to oral question 2017/3583 the Mayor has restated the satisfaction with the consultation and decision-making.'

Comment 9. The process may have been procedurally correct, but referring to my earlier comment to Para 1.3, it was not possible to object to the siting and principle of the bridges in any way, as the outline permission had already been granted in 2012. Nor does this reflect the extent of community and political opposition outlined in my earlier comments (Para 1.4.) Furthermore, John Biggs the Mayor of Tower Hamlets, elected in 2015, has stated his opposition to the H16 bridge which involves the demolition of part of Vittoria Wharf and the all modes H14 bridge.

Paragraph 4.24 'The Environmental Impact Report (EIR) that was produced for the H14 and H16 reserved matters applications included an assessment of air quality, and noise and vibration.

Para 4.25 'This concluded at section 2.3.16 that "there will be no significant increase to the total number of vehicle movements assessed in the LCS [Environmental Statement (ES)] and ES Addendum and no overall changes to the construction activities anticipated, as a result of the reserved matters for bridges H14 and H16. The air quality effects of the Development presented in the ES (as amended) are considered to remain valid."

Comment 10. If there will be "no significant increase" to the total "number of vehicle movements, this undermines the need for the H14 all modes bridge.



Paragraph 4.26 The traffic related emissions associated with vehicle movements on Bridges H14 and H16 would occur regardless of whether or not the bridges come forward, as they are trips generated from the proposed uses of the approved LCS Outline Permission. The contribution of the development traffic emissions to local air quality therefore would not change due to the presence or absence of the proposed bridges.”

Paragraph 4.27 ‘..... the acoustic modelling carried out by Buro Happold demonstrates that noise levels are considered acceptable, being typical of such an urban context and comparable to the lower range of similar residential properties located adjacent to existing small / minor roads in London.’

Comment 11. Punching a road from the Olympic Park to the A12 through Fish Island, via the proposed H14 all modes bridge, risks turning Monier Road and the surrounding area, a really good example of low-traffic, people friendly neighbourhood, into a rat run. The table in paragraph 4.37 states that the H14 all modes bridge will have a ‘neutral’ impact on air quality, the same as a walk cycle bridge. This is just not plausible.

The statement that noise levels will be “acceptable” compared to similar roads, downplays the fact that residents on Monier Road and other link roads will face a significant increase in noise disturbance from vehicles.

Paragraph 4.30 ‘TfL consistently highlighted the relatively low levels of public transport accessibility at Hackney Wick and Fish Island’

Paragraph 4.31 ‘One of TfL’s aims is to ensure passengers do not have to walk for more than 5 minutes (400 metres) to get to a bus stop. Currently, many parts of Fish Island are at the upper limit of the 400 metre range to a bus stop. The new bridge provides the future flexibility to operate bus services through Fish Island to improve this situation for the elderly and those with mobility impairments.’

Comment 12. This is written from the perspective that the current bridge (that will be removed for proposed H14 all modes bridge) does not already exist, basing journey time savings of 400 meters, on the premise that you can’t currently just walk or cycle directly across the canal.

Question 6. If the proposed H14 bridge will, as suggested, improve public transport accessibility, why is the bridge not strictly limited to walking, cycling and public transport? And if this is done, why does H16 need to be built at all?



H16 bridge

Paragraph 5.1 'The case for Bridge H16 alone is not made dependent on traffic modelling and assessment, but is included as part of the package of measures to improve connectivity and accessibility across the Lea Navigation...'

'.....It is required under the LCS consent to ensure that there is a continuous level of pedestrian / cycle connectivity during proposed construction of an all modes bridge H14.'

Comment 13. Clearly there is no transport argument for H16. This confirms that its main role is to provide pedestrian/cycle connectivity during construction of the H14 all modes bridge that involves the unnecessary demolition of Vittoria Wharf and destruction of workspace and small businesses in the process.

Paragraph 5.2 The Olympic Legacy Supplementary Planning Guidance identified "improving local connectivity by creating a network of safe and direct walking and cycling routes across the OLSPG area. This will help improve safety, reduce reliance on cars and link existing and new neighbourhoods with each other, the area's main public transport nodes and town centres, and with the Queen Elizabeth Olympic Park."

Comment 14. There is a good safe and direct walking and cycling route at H14 bridge. Reducing the reliance on cars will not be served by making Fish Island more traffic filled.

Paragraph 5.3 It is estimated that the provision of Bridge H16 adds to the connectivity of the Fish Island area, and provides a journey time saving between the proposed Bridge H16 landing points of 500 metres via Bridge H14, or of 450 metres via the Old Ford lock bridge...

Comment 15. The possibilities of better use and upgrading of Old Ford Lock are exactly what should be considered in any review. According to the LLDC 2014 Transport Background Paper, it would cost £232,000 to upgrade Old Ford Lock to provide access for disabled people

