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**Directorate of Regeneration,
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The Woolwich Centre, 5th Floor
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19/4207/K

13 February 2020

DECISION NOTICE- RAISE OBJECTION

Dear Sir/Madam,

**Town & Country Planning Act 1990 (As Amended)
The Town and Country Planning (General Permitted Development) (England) Order 2015**

Site: Land lying to the west of Angel Lane, Stratford, London, E15 1AA
Applicant: Stratford Garden Development Ltd
Proposal: Development of a multi-use entertainment and leisure building with an illuminated external display (96.5 metres AOD) and external podium and terraces with landscaping (sui generis use including: entertainment, assembly and leisure venue; music venue/nightclub; restaurant / members' lounge/nightclub; bars, restaurants, cafés and retail; storage, vehicle parking, servicing and loading; external podium and terraces for entertainment, assembly and leisure use, café, bar and retail facilities; together with all supporting and complementary uses) and the construction of new pedestrian and vehicular bridges, highway and access works, servicing, open space, hard and soft landscaping, demolition of existing structures, associated infrastructure, plant, utilities and other works incidental to such development

This application is accompanied by an Environmental Statement (ES) submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. It is also accompanied by an application for advertisement consent (planning reference: 19/00097/FUL).

Drawings Covering Letter dated 10 December 2019.

I refer to your letter dated 10 December 2019 enclosing details in respect of the above.

The Royal Borough has now formally considered the matter and wishes to raise objections for the reason(s) attached.

Yours faithfully

A handwritten signature in black ink, appearing to read 'V. Leigh', with a stylized flourish at the end.

Assistant Director

SCHEDULE OF OBSERVATIONS

Application Reference: 19/4207/K

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

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Principle of the Development

The principle of developing a large-scale entertainment venue on this site is not supported by Royal Greenwich. The London Plan (2016) recognises that different town centres play different roles in the night time economy. Map 4.3 shows the hierarchy of strategic clusters of night time economy. Stratford is identified as a cluster of specialist provision of more than local importance, while North Greenwich is identified as a cluster of regional/sub-regional importance. London Plan (2016) Policy 4.7 provides the framework for development in town centres. It expects the scale of retail, commercial, culture and leisure development to be related to the size, role and function of a town centre and its catchment. The position of Stratford in the night time activity hierarchy makes it an inappropriate location for a venue of the scale proposed, particularly in terms of its proximity to North Greenwich, which derives its position in the hierarchy from the O2, which is a venue of equivalent scale.

The draft London Plan has reached an advanced stage with the Intention to Adopt version having been published and the adoption of the final version being imminent and therefore it can be given weight. Draft London Plan Policy HC6 provides more detail to guide determination of applications for night-time economy uses. It expects boroughs to promote the night-time economy where appropriate, particularly in strategic areas of night-time activity. The supporting text of this policy sets out the differing functions of night-time activity centres. In the draft London Plan, Stratford is classed as NT2, which is an area of regional or sub-regional significance, and North Greenwich is classified as NT1, an area of international or national significance. The planning statement submitted as part of the application is clear in stating that this venue will have a national and international catchment, thereby making it inappropriate for Stratford's position in the night-time economy hierarchy.

Therefore, it remains the case that in terms of Policy HC6 and Figure 7.6 of the draft London Plan Stratford is not shown as having international/national importance in the Night-time Economy (NTE). Policy HC6 directs boroughs to support the growth and diversification of the NTE in line with the strategic areas of night-time activity identified by the draft London Plan. The proposed development therefore does not accord with Policy HC6, as it is promoting a venue of national/international significance in an area that has not been identified for this role. It is important to note that although Annex I/Table A1.1 identifies Stratford as having the future potential to be classified as an international centre, that it is not identified as an area of international or national significance for the NTE. Therefore, even if it were to be reclassified as an international centre in the future, this does not automatically make it suitable for a national/international role in the NTE. This failure to accord with the clear strategy in the Development Plan for the site is not in compliance with paragraph 117 of the NPPF.

The applicant's response to RBG's previous comments does not address or justify the fact that the nature of the venue does not accord with Stratford's position in the night-time economy hierarchy as set out in the London Plan and draft London Plan.

In terms of the impact of the proposal on other venues, the applicant has provided arguments about London's supply of dedicated major entertainment venues in comparison to other competing global cities based on calculations of average population size per venue. It is also stated that demand for entertainment events in London is increasing. However, the applicant's arguments and supporting information do not provide evidence to demonstrate that there is an undersupply of major entertainment venues in London directly related to the level of demand for entertainment in London.

There is a risk that a venue of the scale proposed could undermine existing similar venues. This is a particular concern with regards to the O2, which is in close proximity to the proposal site and serves a similar function. The applicant has sought to address these concerns by providing a comparison of different cities in terms of their large-scale concert venues. They have included a report by Sound Diplomacy entitled London's Venue Market: An International Benchmarking Study. It is considered that the comparisons made in the report are inappropriate in the context of London's population, layout and the nature and use of its existing entertainment venues.

The assessment of London's existing venues does not include venues that are capable of hosting major concerts, but primarily host sporting events. Wembley Stadium, for example, frequently hosts concerts and has a capacity of 90,000; and the London Stadium, located extremely close to the application site, has a capacity of 66,000. These venues should be included in any assessment, particularly if they are being compared to Madison Square Garden and the Barclay's Centre in New York and Berlin's Mercedes-Benz Area, which all primarily host professional sporting events. The assessment also excludes London's smaller, but still significant, concert venues, which also play a role in meeting the demand for venues and include the Royal Albert Hall, the London Coliseum, the Royal Festival Hall, the Barbican Hall and the London Palladium. The detailed context of London's live music venues needs to be properly assessed before an application for such a significant addition can be considered.

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Transport Impact

London Plan (2016) Policy 6.3 requires planning applications to fully assess their impacts on transport infrastructure. The updated Environmental Statement submitted with the application includes a chapter covering the impacts on transport, including an assessment of the impacts of the development on public transport capacity. The assessment shows that a fully-booked event has the potential to increase demand on the public transport network by 49% when it coincides with the PM peak. It also shows a worst case scenario situation in which an event at the development coincides with a full-capacity event at the London Stadium. In this case, the demand for public transport across all lines is pushed significantly above available capacity.

It should be noted that, in response to the EIA Scoping Request, the Royal Borough requested that the assessment include the cumulative impacts on the Jubilee Line when

capacity-level events at the proposed development, the Excel Exhibition Centre, the Copper Box Arena and the London Stadium coincide with a capacity-level event at the O2. This has not been included in the main section of the ES, but the Transport Assessment does model scenarios that include events at the proposed development, the London Stadium and the O2 and their impact on the Jubilee Line at North Greenwich. These scenarios demonstrate that there is insufficient capacity on the Jubilee Line to cope with all three venues staging coinciding events, with all times showing demand significantly exceeding capacity. Even without including a London Stadium event, the scenarios demonstrate that there is insufficient capacity in most of the timeslots. While the night tube service on the Jubilee Line mitigates this to some extent on Friday and Saturday nights, the demand still exceeds capacity until 00:00. The actual impact of this would be that when events end earlier at the proposed venue than those at the O2, those leaving the O2 may be delayed from boarding an eastbound Jubilee Line service for some time or at all on nights when the night tube isn't available, creating more demand on other modes and local services.

It is noted that proposed mitigation for when there is insufficient public transport capacity includes managing event timings, ticket sales and travel demand management but it is unclear from the application documents how this would be implemented.

The Transport Assessment clearly demonstrates that there is insufficient capacity on the Jubilee Line to accommodate the increase in demand from this development. Chapter 6 of the Revised ES reports a Residual Effect (Post Mitigation) negative, direct, permanent, irreversible long-term, Moderate -Minor Adverse effect on public transport capacity on the Central and Jubilee Lines when a full capacity event at the proposed venue clashes with peak travel periods or other large events It would, therefore, have an unreasonable negative impact on public transport services in Royal Greenwich.

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Impact on Maritime Greenwich World Heritage Site

Volume 2 of the updated Environmental Statement TBHVIA provides additional view LVMF 5A.1: Greenwich Park: the General Wolfe Statue. It is agreed that these assessments show that the proposed structure will not be visible from the Maritime Greenwich World Heritage Site.