



Response to MSG Sphere planning application

To The Planning Policy and Decisions Team,
London Legacy Development Corporation
In respect of Application Reference 19/00097/FUL
Date June 2019

This response to the planning application for the Madison Square Garden Sphere is from **Newham Cyclists**, the local borough group of the London Cycling Campaign (LCC). We represent the interests of people in Newham who already cycle, and campaign for safer streets that would make cycling a mainstream, inclusive, and convenient mode of transport for everyone. We want to see cycle facilities at least as good as neighbouring boroughs, and believe that becoming a cycling borough will help make Newham an excellent place to live, work, and stay.

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Summary

We **formally object** to the application in its current form.

- In light of the ambition of the Olympic Legacy, and the Mayor's ambition for London to become a cycling city, we are confused and disappointed by the **proposed cycle parking provision of 50 spaces for a 21,500-capacity venue—designing in a maximum cycling modal share of 0.2%**. This is inadequate. It contrasts sharply with the 2,623 car journeys designed in for a sold-out event. It also disregards the demonstrable latent demand for cycling to music events, as demonstrated by the oversubscribed temporary cycle parking at the All Points East festival in Victoria Park. **In the context of a climate emergency and an air pollution crisis, it is irresponsible to design out sustainable transport in this way.** The applicant should be presenting innovative solutions that will make walking and cycling the obvious, mainstream choice to reach the venue for local residents.
- Whilst we welcome the principle of an **extended cycleway on Montfichet Road**, the **interruptions by shared areas**, and the fact it will be used as overflow for the footway during busy times, means the cycleway is **likely to be unusable for a lot of the time—particularly when it will be most needed**. The proposals on Montfichet Road do not go far enough in enabling low- and zero-emissions transport to the venue. They also do not deliver any badly-needed improvements to the surrounding streets, particularly where motor traffic volumes are likely to increase as a result of people driving to events.
- We are alarmed by the proposal to **narrow the carriageway on Angel Lane** and force people to cycle in a narrow lane, in front of motor vehicles. This will be a **hostile environment for people to cycle in**, particularly for younger people, families, older people, and disabled people. We are not convinced it will have the desired effect of making motorists behave considerately, and are concerned it will lead to **people cycling being tailgated, passed dangerously, and bullied onto the footway—particularly given the volumes of event servicing traffic which will use Angel Lane.**

Background

The Olympic Park's road network is currently not up to scratch. **The Park is currently blighted by high volumes of motor traffic**, with excessive speeds, and inconsistent - and often unsafe - provision for people cycling and walking.

The Mayor's Transport Strategy relies on a growth in cycle trips to keep London moving. This means infrastructure schemes **must** be designed to accommodate growth in cycling. As demonstrated by the success of recent Cycle Superhighways, and the Mini-Holland projects in Waltham Forest and Enfield, people cycle when they feel safe.

For cycling to become mainstream, a network of high-quality, direct routes, separate from high volumes and/or speeds of motor traffic, is required to/from all key destinations in an area. **Schemes should be planned, designed, and implemented, to maximise potential to increase journeys.**

All schemes must be designed to make cycling comfortable, convenient, and safe for people of all ages and abilities. This includes not just adult commuter and leisure cyclists, but also children, elderly people, and disabled people who may rely on specially adapted cycles. The Olympic and Paralympic Legacy must be for all Londoners, not just those willing to cycle in heavy traffic. Above 2,000 Passenger Car Units (PCU) per day, and/or where motor traffic speeds exceed 20mph, cycling should be physically separated from motor traffic.

Evidence from other schemes in London and worldwide shows that a wider range of people cycling is good for local businesses, reduces harmful climate-changing and particulate emissions, and has positive outcomes for people's health. As a result, **if cycling facilities are not good enough for all kinds of people cycling, all the time, they are simply not good enough.**

Modal share and cycle parking

We note the trip generation calculation in Chapter 7 which forecasts a cycling modal share of 0.1% for spectators, i.e. 22 visitor cycle trips to a sold out event. However, we believe this calculation is flawed, and risks locking in a 12.2% car modal share for the MSG Sphere - resulting in up to 2,623 car journeys for a sold out evening or matinee event, and up to 5,375 for an overnight event. Moreover, we believe there is a considerable suppressed demand for cycling to music events which has not been examined.

In any case, an additional 2,623 vehicles on the roads of the Olympic Park—which already receives too much car traffic—will further increase carbon emissions, air pollution, and road danger. Simply proposing the status quo again is unacceptable. **The applicant must demonstrate how they will shift the modal share away from private cars and towards sustainable modes (walking, cycling, public transport.)**

Trip generation calculations: the missing picture

The modal share forecasts have been calculated based on three samples of large events at the London Stadium. The Stadium provides a poor environment for visitors arriving by cycle:

- Cycle parking is not clearly signed. The cycle parking that is available is in exposed areas with low footfall, making them a magnet for thieves;
- During events at the Stadium, large crowds of pedestrians make the shared surface of the parkland difficult to cycle on;
- During events, the key links from Cycle Superhighway 2 (Stratford High Street) to the Park are closed to motor traffic. For extremely large events (for instance, during Beyoncé's concert), stewards often stand on Montfichet Road telling people cycling to dismount and push. This is inconvenient for everyone, and also discriminates against disabled people for whom cycling is easier than walking, and who may not be able to get off. The current traffic management strategy flies in the face of the Paralympic legacy;
- The existing cycling network in the Park, including the obvious links to Cycle Superhighway 2 and to the Waltham Forest Mini-Holland scheme, has serious deficiencies which LLDC, the local councils, TfL, the Mayor, and LCC have recognised for many years.

We are disappointed that Chapter 7 takes the existing figures for the Stadium and simply proposes the same for the MSG Sphere. **The status quo at the Stadium is unacceptable, and the mistakes made there must not be repeated.**

Latent demand for cycling

Previous schemes have shown that when high quality cycle facilities (both parking and road infrastructure) are installed, people use them. Indeed, many schemes (such as Cycle Superhighway 3 from Lancaster Gate to Barking via Shadwell) are victims of their own success, with the cycleways now crowded and over capacity at peak times, and further upgrades proposed.

The London Plan's cycle parking requirements for a venue of the Sphere's type are for 1 space per 30 seats (assuming 17,500 seats, this would mean total space for 583 cycles.) However, the planning application states these requirements would be "a significant overprovision."

We dispute the notion that a low cycling modal share is inevitable. Where music events make accommodation for people arriving by sustainable modes, people do.

Counter-example: All Points East

The **All Points East** festival, including evening music gigs, takes place over a week in early summer every year in Victoria Park, which is a short distance from the Olympic Park. Much like the Olympic Park, it is a short cycle journey from Cycle Superhighway 2, and also lies at the nexus of several major corridors for cycle journeys.

For this year's festival, with an approximate attendance of 40,000 people, All Points East provided additional cycle parking in the form of temporary railings and barriers for people to lock their cycles to. The website for All Points East also recommended cycling as one of the best modes of transport to reach the festival.

On several evenings during the festival, the cycle parking was oversubscribed, with well over 100 cycles locked up in the temporary cycle parking; many more people had locked their cycles to the railings surrounding Victoria Park, despite notices telling them not to.



Above: Temporary overflow cycle parking for All Points East on 24th May, considerably oversubscribed.

Below: Cycles chained to the railings at Victoria Park on the same evening.

The conclusion we can draw here is that where cycling is properly considered and catered for, people will cycle to reach large music events. A low cycling modal share is not inevitable.

Public transport assumptions

We have an interest in high-quality public transport. Good public transport means fewer cars on the road; it means a smaller carbon footprint and less particulate pollution.

We are concerned that the Transport Assessment makes optimistic assumptions about public transport, and the rate at which people will arrive by public transport.

Stratford station operates over capacity, and there are few improvements forthcoming. Crossrail (the Elizabeth line) will provide longer trains once it fully opens, but the frequency will be broadly similar to what it currently is. The JNAT (Jubilee and Northern Additional Trains) project has been “paused” due to funding pressures at TfL.

We are concerned that visitors to the Sphere—and also local residents and commuters—will be increasingly unhappy to squeeze themselves into ever more crowded trains. This may result in an increase in car journeys beyond what has been projected based on existing travel patterns.

We are particularly concerned that the bulk of the arrival profile for a weekday event (table 7.1 in the Transport Assessment) is during the evening peak and shoulder peak: 77%, or 16,555 visitors projected to arrive between 18:00 and 19:30. This will make some of the most crowded platforms unusable, with people unable to alight and unable to board trains. This will result in the station being closed for safety reasons. If this happens repeatedly, people will stop taking the train and will drive instead.

We are also concerned that the extra people joining the Jubilee line at Stratford will cause problems at North Greenwich station, when the Sphere and the O2 Arena are running major events at the same time.

Modal share and cycle parking conclusion

The proposed modal share of 0.1% for cycling, and the associated cycle parking proposal of 50 spectator spaces, is completely inadequate. A state-of-the-art venue should not be designing for a modal share from the last century, and should not be repeating the planning mistakes of previous venues in the area.

Newham Cyclists demands:

- Innovative solutions to unlock latent demand for cycling to the venue, to achieve a cycling modal share of 5-10%, and cycle parking provision to accommodate this.
- Secure cycle parking *at* the venue, in an area of high footfall, front-and-centre—not hidden out the back, or in quiet areas under bridges or in car parks where thieves can work undisturbed.
- Considerable upgrades to Stratford station and a travel plan that won't make it unusable for local residents.

Montfichet Road and surrounding streets

We strongly support the principle of narrowing the carriageway on Montfichet Road to reduce motor traffic speeds, and of extending the existing cycleway. If executed properly, it could provide a high quality connection between East Village and Stratford station, and be a key route for visitors arriving at the Sphere.

We are concerned that the designs proposed by the applicant are not up to best practice in London, let alone internationally. They only treat a small section of Montfichet Road, and still give up with shared footway/cycleway treatments at the junctions and at the end of the road. Conflict between people walking and cycling is baked into the design.

We are also disappointed that there are no improvements proposed to the surrounding streets. International Way, Hitchcock Lane, Penny Brookes Street, and Celebration Avenue are crying out to be made safer for walking and cycling—which will become more urgent when high volumes of motorists travelling to the Sphere begin using these roads to access the car parks.

Shared zones

Shared space between walking and cycling can work in ‘destination’ areas where the only people cycling are people accessing a destination in the area. When leaving or arriving, people typically cycle more slowly, and the volume is low.

However, if people are cycling *through* a shared zone to get somewhere else, the situation will be inconvenient for cycling, and unpleasant for people walking in the shared zone (particularly visually impaired and d/Deaf people, who may not be able to tell when a cyclist is approaching.) It is likely that some cyclists will instead use the carriageway. When the footway and shared zone becomes crowded, it will be dangerous to mix cycling and walking.

We are deeply concerned about the danger of pedestrian/cycle conflict at the bridge landings. We think it’s likely that it will be inconvenient enough to use this cycle track that ‘more confident’ cyclists will simply use the carriageway; based on the provision of Advance Stop Lines, we assume this is the intention. **If cycling infrastructure is not good enough for all kinds of people cycling, it is simply not good enough.**

Junctions and pedestrian crossings

Shared footways at junctions, as seen at the junctions with Hitchcock Way, International Way, and the existing ‘infrastructure’ at Penny Brookes Street, is a sub-

optimal and indirect solution that puts people walking and cycling in direct conflict with each other. People cycling are expected to swerve onto the pavement, wait at the pedestrian crossing, cross with pedestrians, and then (potentially) swerve back into the carriageway.

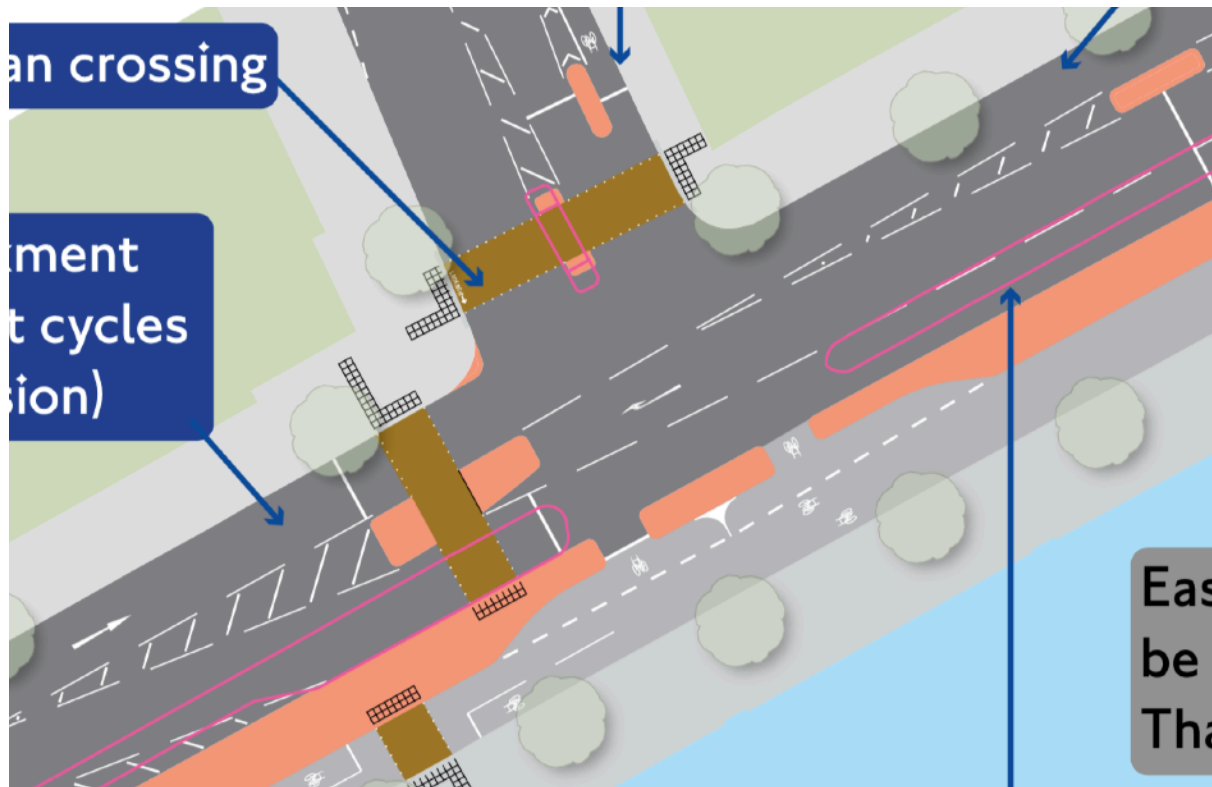
As with any shared area, this is inconvenient for people cycling and can be dangerous for people walking. It does not work when there are anything other than very low volumes of people cycling and walking. In practice, those cyclists willing to accept the risks will use the carriageway instead.

Counter-example: East-West Cycle Superhighway (CS3), Embankment

We want to see these junctions redesigned such that people cycling and walking do not have to share space when crossing, and instead have parallel crossings. Several examples of how to do this with a bi-directional cycleway can be found on East-West Cycle Superhighway (the central London section of Cycle Superhighway 3). The example we examine here is at the junction of Victoria Embankment and Horse Guards Road.

The key features of these designs are as follows:

- The cycleway is always between the carriageway and the footway. People walking do not have to walk between two lanes of vehicular traffic, and conflict points are reduced.
- People cycling out of Horse Guards Avenue can simply proceed straight ahead to join the cycle track. They have a separate green phase from motor traffic, so there is no risk of 'left hook' movements. This junction, and the fact the cycle track is wide enough to accommodate all kinds of people cycling, means there is no need for Advance Stop Lines at this junction.
- People cycling out of Victoria Embankment and turning onto Horse Guards Avenue have their own waiting area. Again, they do not have to cross paths with pedestrians or mount the pavement in order to turn; they simply wait at the stop line. When all conflicting traffic is stopped, the light turns green, and they can safely and comfortably turn into Horse Guards Avenue.
- People cycling through the 'top' of the 'T' junction are unaffected by cyclists joining and leaving the track. They can simply continue unhindered, while cyclists joining the track naturally give way.



Above: An example of a side-road access from East West Cycle Superhighway (CS3) between Victoria Embankment and Horse Guards Avenue. Source: https://consultations.tfl.gov.uk/cycling/71a267bd/user_uploads/sect-1-17-combined.pdf
Below left: The view looking south from Horse Guards Avenue towards Embankment. Note that motor traffic is held on a red light while people cycling get a green.
Below right: The view from the footway looking towards Horse Guards Avenue. Note the cycle light and wide waiting area, and that people leaving the cycle track do not have to mount the pavement.



- This design is not perfect: it would be even better with pedestrian crossings on all arms of the junction, and with a straight-across zebra crossing of the cycle track for pedestrians. But overall, this design offers a significant improvement over mounting a shared pavement and crossing with pedestrians.

General design notes

- If possible, people walking should not have to cross onto a bus stop bypass and then back again to continue their journey on the pavement. (In practice many people here will simply walk in the cycleway.)
- It is critical that the correct tactile markings are used to mark out the cycleway and footway. If possible, there should also be a level change, and a contrasting surface.
- At signalised junctions, all arms of the junction should have a pedestrian crossing. **The proposed design at the junction with International Way has no crossing on the northern arm. This means people walking and cycling are expected to take an indirect and inconvenient route.** In reality they are likely to try to cross outside the crossing.

Surrounding streets

Penny Brookes Street, International Way, and Hitchcock Lane are all wide streets that invite speeding by drivers. None of them has protected cycling facilities. This is already unsafe in its current state, and is likely to get worse when the Sphere generates more car journeys to the Westfield and HS1 car parks.

These safety issues can be addressed by installing protected cycle tracks, and simplifying the junctions, on all these streets in parallel with the Sphere development and the new cycleway on Montfichet Road. At a very minimum we want to see protected cycle tracks on International Way, to provide a safe route for people cycling to Stratford International Station and past the HS1 car park entrance. We also insist on improvements to Penny Brookes Street junction, a confusing and dangerous junction for walking and cycling that prioritises motor traffic over people.

There is also an opportunity to leverage s106 funding to provide protected cycle tracks and simpler pedestrian crossings on streets such as Celebration Avenue, which could connect the Sphere to the future Quietway 6 on Honour Lea Avenue, and onwards to the Waltham Forest Mini-Holland improvements via Temple Mills Lane.

This would help to unlock considerably more cycling journeys, and go some way towards making visiting the Sphere by cycle the obvious choice for local residents.

Montfichet Road conclusion

While the attempt to provide an extended cycleway on Montfichet Road is welcome, the designs presented by the applicant are not up to modern standards and are not ambitious enough. We are amazed that, as the deficiencies on Montfichet Road have been recognised for so long, it has taken seven years to produce such a mediocre proposal. The proposed cycle track would have been considered impressive fifteen years ago, but the scale of the climate and air pollution crises, and the operational demands of the Sphere, Stratford station, and Westfield, require more radical solutions.

Newham Cyclists demands:

- that the applicant significantly revises designs for Montfichet Road, to the standard seen in schemes such as Stratford town centre, and Embankment;
- if the new designs make it necessary, traffic reduction measures (a bus gate; relocation of the taxi rank; etc.) are considered on Montfichet Road;
- that the opportunity is taken to make considerable improvements to Penny Brookes Street, Hitchcock Lane, and International Way. These roads require protected cycle tracks to connect with the route on Montfichet Road, and onwards via Celebration Avenue to Quietway 6 on Honour Lea Avenue and the wider local network.

Angel Lane

Angel Lane is a corridor of very high suppressed demand for cycling, as identified in TfL's Strategic Cycling Analysis¹ (route 7: Leyton to Barking Road.) It is therefore critical that this demand is unlocked, with safe, comfortable, convenient facilities to enable cycle journeys to Stratford, the Sphere, and beyond. The facilities here need to be exemplary, and suitable for all kinds of people of all ages to cycle on.

We are deeply disappointed by the proposal to narrow the carriageway to provide a 'consistent width' on Angel Lane, without providing any protected (segregated) cycling facilities. We note that clause 6.185 suggests:

*"For the A112 Angel Lane, this results in a direct permanent medium impact on a receptor of high sensitivity. This equates to a **major beneficial** effect. This is considered **significant**."*

We strongly dispute this analysis of the proposed scheme on Angel Lane. We think it will make it even harder for people who do not already cycle to use this important route, for the following reasons:

- Most people will find it harder to adopt a central position in the lane—particularly less experienced cyclists, children, and disabled people. This means they are likely to cycle dangerously close to the kerb, or even on the pavement.
- We are not convinced that taking a central position in the lane is enough to stop motorists from bullying or intimidating people cycling.
- In any case, it is not a pleasant, relaxing, or convenient experience to cycle whilst being followed by a motor vehicle, even if the driver is being careful. This means that people will feel unsafe cycling here, and are likely to stop cycling.
 - This is particularly true on an uphill gradient, where drivers will need to rev their engines to get up the hill. This also means drivers are likely to speed exactly when people are likely to cycle more slowly.

Designing infrastructure that expects people to cycle 'assertively' and share space with motor vehicles is a failed policy, and has contributed significantly to the UK's dismal cycling modal share. We are appalled that this is considered an acceptable solution for a corridor of such potential for inclusive cycling. This is the antithesis to the ambition of the Mayor's Transport Strategy, and to the Olympic Legacy.

¹ <http://content.tfl.gov.uk/strategic-cycling-analysis.pdf>

When cycling in the carriageway is acceptable

Expecting people to cycle in the same space as motor vehicles is only acceptable when:

- Traffic volumes are low (TfL guidelines suggest an absolute maximum of 500 vehicles in the busiest hour, with a preferred maximum of 200)²;
- Speeds are low (85th percentile not in excess of 25mph);
- The volume of HGVs is no more than 5%.

Above these speeds and volumes, there are two options:

- Provide physical separation for people cycling, in the form of a kerb- or wand-protected cycle track.
- Employ traffic reduction and traffic calming measures to bring the speeds and volumes down to acceptable levels. This is unlikely to be acceptable on Angel Lane as it is a key route for buses and part of the A112.

Current conditions on Angel Lane

Newham Cyclists could not find up-to-date traffic count data available for Angel Lane. The latest manual count from DfT for Leyton Road (just north of Angel Lane) is from 2011, before the Olympics, before the opening of Westfield and East Village, and well before the switch of Stratford Town Centre to two-way.³

We note the absence of any traffic count data for Angel Lane in the Transport Statement and Transport Assessment, which brings us to think that current traffic volumes and speeds are not well-understood by the applicant (or anyone else) on this critical future link in the cycling network, and a critical route for traffic to the Sphere.

However, going based on the latest available data from 2011:

- The total number of motor vehicles recorded was **8849**.
- Even using a naïve assumption that traffic flows were constant throughout the day ($8849 \div 24$) this would mean **369** motor vehicles a day use this road. This exceeds TfL's preferred maximum volume for high quality cycle routes.

² <http://content.tfl.gov.uk/cycle-route-quality-criteria-technical-note-v1.pdf>

³ <https://roadtraffic.dft.gov.uk/manualcountpoints/26659>

- In practice, the peak traffic flows are likely to be considerably higher. In practice this means that, in the busiest hour, motor traffic flows are much higher than the preferred and absolute maximums allowed under TfL's quality criteria.

We are unable to find any analysis in the planning application of potential increases in traffic levels on Angel Lane as a result of the Sphere development. However, we feel that even more traffic on Angel Lane is inevitable if the Sphere is built:

- The main entrance for events traffic will be on Angel Lane;
- If Warton Road is closed (as it is on West Ham match days and Stadium event days), Angel Lane becomes a key route for drivers to access Westfield and HS1 car parks;
- Angel Lane will also be used by motorists accessing the Stratford Centre car park from Leyton and beyond.
- If the Silvertown Tunnel is built, traffic on the A112 will increase considerably, as this is one of the most direct routes on the north/south axis from the proposed tunnel site.

On Monday, 24th June 2019, Newham Cyclists began their monthly meeting with a ride around Stratford Town Centre and the roads surrounding the Sphere. We noted that not only was the wide carriageway inviting drivers to take a swept path (in many cases driving on the wrong side of the road)—the fact Angel Lane has a steep gradient meant many drivers were speeding by the time they reached the highest point.

The conclusion we draw from this is that Angel Lane is not an acceptable or safe environment for cycling now—it is even less likely to be so once the Sphere opens, if no protected space for cycling is provided.

When “riding central” isn't enough

There are many documented examples of cases where riding in the centre of the lane is not enough to prevent dangerous overtakes or bullying from motorists.

- Some motorists believe (wrongly) that cyclists should always ride as close to the kerb as possible;
- Some motorists believe (wrongly) that people cycling do not pay towards the upkeep of the roads, and so have no right to use them;



Above: A dangerous overtake by a driver when the cyclist was adopting a primary position in the centre of a narrow lane. Credit: YouTube: CyclingMikey

Below: A driver overtaking into oncoming traffic at speed when the cyclist was cycling close to the centre of the lane. Credit: YouTube: magnatom



- Some motorists are simply impatient.

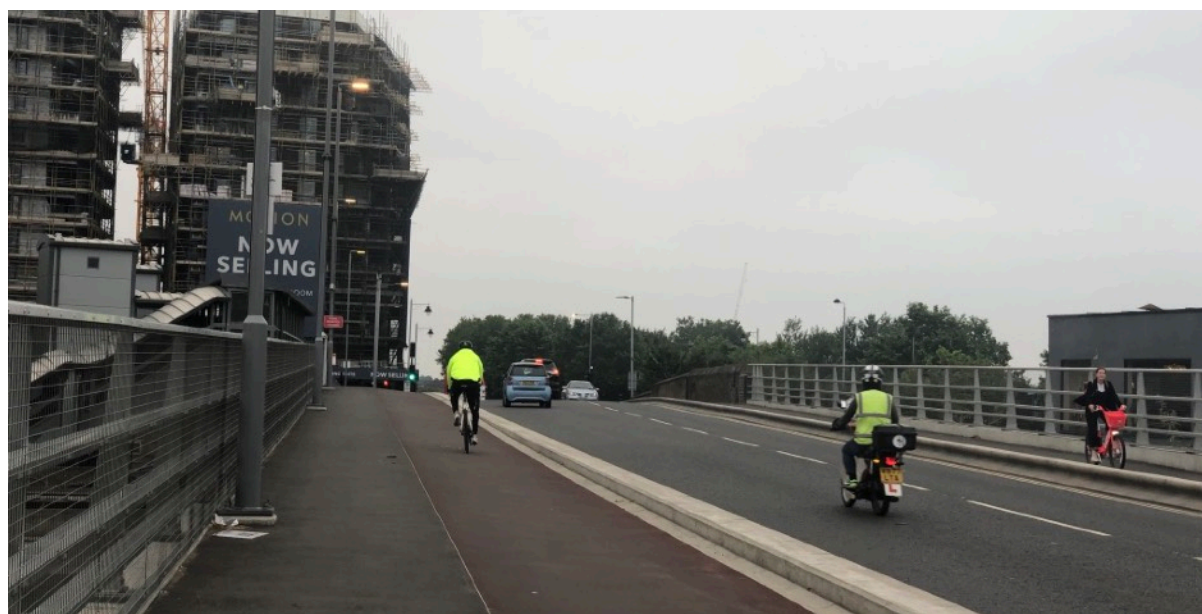
It is not reasonable to expect people cycling to put up with motorists bullying them. We think it's also likely that this further excludes under-represented minorities from cycling.

Counter-example: making space for cycling by widening a bridge

A104 Lea Bridge Road has been the flagship scheme of the Waltham Forest “Mini Holland” scheme. At the time of writing, Waltham Forest Council is near to completing the installation of 4km of fully-protected cycle tracks on this important high street: busy not only with cars and buses, but also with people walking and cycling.

A major challenge to the scheme was at the railway bridge adjacent to the Orient Way/Argall Way junction. This Victorian railway bridge did not have adequate width for motor traffic lanes, pavements, and protected cycle tracks on both sides.

The solution was to widen the bridge with an extension, at a cost of £2.3 million.⁴ The result provides a safe space for every kind of road user, and avoids conflict between walking, cycling, and driving on this important section of road near to Lea Bridge railway station. It also leads into an exemplar **protected intersection**, one of the first of its kind in the UK, which provides an easy and safe way for people to cycle in all directions whilst minimising pedestrian conflict.



Above: Lea Bridge Road, Waltham Forest. This bridge was extended to provide space for separated cycle lanes on both sides. Both directions are well-used.

⁴ <https://procontract.due-north.com/ContractsRegister/ViewContractDetails?contractId=f9ef148d-c208-e711-80dd-005056b64545>

Angel Lane conclusion

The proposed non-provision for cycling on Angel Lane is symptomatic of the lack of ambition shown by the whole MSG Sphere project towards sustainable transport.

They will do nothing to make it easier for more people to cycle. They will scupper any increase in cycling on this important route for decades to come. Considering the Mayor's ambition for London to become a cycling city, and the speed at which our economy needs to de-carbonise to avoid a climate catastrophe, this is another irresponsible omission.

Newham Cyclists demands:

- High quality protected cycle tracks in both directions, to best-practice standards, on Angel Lane.
 - If no money or space can be found to widen the road at its narrowest point, the existing traffic signals could be moved to signalise motor traffic through a narrowed carriageway in alternating directions at the pinch point.
- Cycle tracks must connect to the exemplar cycle track on Great Eastern Road, and therefore via Stratford Town Centre to CS2.
- The cycle tracks must also have scope for extension up Leyton Road along Route 7 identified in TfL's SCA.

Miscellaneous items and remarks

- We are very concerned that **light pollution from the Sphere** will be **distracting to motorists**, and to people walking and cycling. This is especially concerning where people cycling are expected to share space with motorists (as on Angel Lane), and where people walking are expected to share space with people cycling (at the bridge landings on Montfichet Road.)
- **We object to the removal of the bus lane on Montfichet Road.** Taxis should not obstruct buses (or indeed cause danger to people cycling, who will need to use the carriageway if the cycle track is overflow for pavement). We suggest that the following measures are considered:
 - relocating the taxi rank;
 - Intelligent traffic signals to ensure buses have priority
- **Advance stop lines are not inclusive infrastructure.** They do not work on streets with high traffic volumes, and only ever work if people cycling arrive when the traffic light is red, and the box is clear (no motor vehicles stopped there.)
 - There is also a considerable danger from drivers breaking the rules at advance stop lines. In February 2017, at the junction of White Church Lane and Whitechapel High Street, a left-turning coach driver ran over, and killed, a 32-year-old architect who was cycling to her workplace on Osborn Street. The coach driver had not seen her in his mirrors. When interviewed by police, the driver admitted that he routinely (and illegally) pulled into the advance stop line to avoid being “swarmed by cyclists.”⁵
 - Advance stop lines should only be relied on for junctions with low traffic volumes. A feeder lane should also be provided to allow people cycling to access the lane. Camera enforcement should also be considered.
 - Overall, while ASLs can occasionally benefit some people who already cycle, they will not make it easier for people who don’t already cycle to begin cycling.

⁵ <https://www.standard.co.uk/news/crime/coach-driver-who-killed-young-architect-karla-roman-as-she-cycled-to-work-jailed-a3942281.html>

- **We would like clarification on what will happen to the Santander Cycles docking station opposite the Westfield entrance to Stratford station.** We would like an assurance that this will be retained, expanded, and kept available for use before and after major events—particularly when events finish late at night, or when there are problems on the Underground, it is likely people will choose to hire a cycle to get home after their event.
- **Warton Road and traffic flows to the car parks:** The junction between Stratford High Street/CS2 and Warton Road is dangerous. There is already a considerable problem with motorists going to Westfield turning left across the path of people cycling.
 - Has the impact of people driving to the Sphere (and presumably using Warton Road to access the car parks, turning left across cyclists going straight ahead) been assessed at this junction?
 - On West Ham match days and other major Stadium event days, Warton Road is closed (including on West Ham match days). How will people drive to the Sphere on these days?
 - It is possible that future safety improvements and bus priority measures could result in this junction being changed. How would people drive to the Sphere if the match day arrangement became permanent?
- **Monier Road bridge:** The Monier Road bridge, currently under construction, will provide a link initially for buses and cycles only from Monier Road. If the Sphere is built, it is crucial that this bridge is never opened to general traffic—it provides an obvious route for drivers to bypass Stratford High Street by rat-running through residential streets from the A12.
- **We would like a stipulation that all HGVs used for constructing the Sphere and servicing it** (including event vehicles, catering, set/prop and artist transport etc.) **must be to the highest Direct Vision standards** (i.e. with a glass cab so the driver is able to see any pedestrians or cyclists on their near side.)⁶
- **We would like a stipulation that roadworks and construction works associated with the site are managed inclusively, with access retained for walking and cycling.** “Cyclists dismount” signs should not be used, and people walking and cycling should not be subject to circuitous diversions.

⁶ <https://tfl.gov.uk/info-for/deliveries-in-london/delivering-safely/direct-vision-in-heavy-goods-vehicles>

Conclusion

Our view is that the MSG Sphere development should not go ahead in its current form, without the major issues we have highlighted being addressed satisfactorily. If the applicant can not remedy these problems, then the development should be cancelled.

Newham Cyclists is deeply disappointed that such a major scheme shows a chronic lack of ambition for sustainable transport. We believe it will cause major problems for people using public transport, walking, and cycling in Newham.

We are also extremely concerned that the proposed travel arrangements will result in a considerable increase in CO2 emissions and in particulate air pollution. In light of the climate emergency, this is downright irresponsible.

Our key demands are as follows:

- **The applicant must produce a new travel plan** which indicates how they are going to **minimise the number of private cars on the road** for each event, **avoid further overcrowding and closures at Stratford Station**, and **how they will achieve a cycling modal share of 5-10%**. They must demonstrate a commitment to making travel to the venue as close to zero-carbon as is possible, and how they will minimise adverse impacts on local residents and businesses.
- **The applicant must revise their designs for Montfichet Road to best practice standards**, taking even more space away from private motor traffic if needs be, and reducing conflict between people walking and cycling to a minimum;
- **Angel Lane must be redesigned completely to include protected cycle tracks to best practice standards**, to ensure that cycling is not locked out of this key route in future.

Acknowledgments

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- CyclingMikey on YouTube: <https://www.youtube.com/watch?v=WUBmfwV5XE8>
- magnatom on YouTube: <https://www.youtube.com/watch?v=fPyF3oV-9I0>