



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
Revised January 2020
Revised November 2020

This response to the planning application for the MSG 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.

This response has been **revised in January 2020** to take account of new information and changes to the application that have been made by the applicant. It was further revised in **November 2020** to take account of new information provided by the applicant, and also recent changes in the national policy context for local transport, specifically the new infrastructure standards published by the Department for Transport.

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Preface

Following the original planning application consultation period, MSG have provided additional information and revised some of their application at LLDC's request. Newham Cyclists has, in turn, revised its response based on the new information provided, and taking into account information and research that has come to light since then.

In addition, in July 2020, the Government published an updated guidance document, **Local Transport Note (LTN) 1/20**, for cycling infrastructure¹, in an aim to build on the significant increase in people cycling during the COVID-19 pandemic. We insist that any new schemes approved by LLDC must be exemplar according to this new guidance, and will be using this to assess the cycle parking provisions, and changes to the urban realm, proposed by the applicant.

Summary

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

- In light of the climate emergency, the ambition of the Olympic Legacy, and the Mayor's ambition for London to become a cycling city, **the proposed modal share is completely unacceptable.**
 - We remain disappointed by the **proposed cycle parking provision of 96 spaces for a 21,500-capacity venue**—designing in a **maximum cycling modal share of 0.44%**. The proposed mode share of 0% for cycling for the nightclub and members' club is also completely unacceptable. **The applicant should be targeting a modal share of 5% for guests at all three venues.**
 - It 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.**
 - It contrasts sharply with the proposed mode share for cars of **12.2%**, or **2,623 car journeys** designed in for a sold-out event in the largest venue.

¹ <https://www.gov.uk/government/news/pm-kickstarts-2bn-cycling-and-walking-revolution>

This is incompatible with reducing dependency on the private car and enabling mode shift to sustainable transport.

- We are also concerned that the proposed hosting of different types of events—particularly ring sports—will lead to a different profile of guests, who will prefer different modes of transport. We are surprised to see no clear reference to this in the transport assessment. **Given recent experiences in particular with ring sports events at the Copper Box arena, we are worried that this will lead to:**
 - a larger modal share for driving for certain events;
 - anti-social parking, including on pavements and cycleways, which must be properly prevented with hard engineering measures.
- The applicant should be presenting innovative solutions that will make walking and cycling the obvious, mainstream choice to reach the venue for local residents and staff members. **We want to see the applicant producing concrete measures for a cycling modal share of 5%+ for all types of events.**
- **We also note that there is no provision for non-standard cycles, e.g. tricycles, handcycles, and cargo cycles, particularly of the kinds likely to be used by families and by Disabled cyclists. This is an unacceptable omission.**
- We are appalled to see that there has been no change to the proposed mode share as part of the revised planning application. For the avoidance of doubt, the current modal share at the London Stadium is unacceptable, and we implore the Planning Committee to demand better from new developments—**the Park deserves better.**
- Whilst we welcome the principle of an **extended cycleway on Montfichet Road**, the details are very poor and the treatment **does not deal with the existing network-wide problems with the Olympic Park's cycling network.**
 - **We are pleased to see that the design appears to have been revised slightly**, providing a light-controlled pedestrian crossing over the cycle track. We also approve of the change to the bus stop bypass meaning that pedestrians who aren't accessing the bus stop can simply walk in a straight line without having to cross the cycle track. Finally, we are also pleased to see that the cycle track only switches side on the pavement once, unlike twice as dictated by the original design.

- **However, the cycleway is still interrupted by large shared areas at the junctions with Hitchcock Lane and International Way, and starts out on the wrong side of the footway north of the junction.** The junction designs are indirect, involve cyclists mounting the pavement and making sharp turns, and will create conflict between people walking and cycling. The junctions must be redesigned to best-practice standards for two-way cycle tracks.
- **The cycleway will also be suspended during egress from events, making it basically useless and again forcing people walking and cycling into the carriageway, to share space with heavy vehicles.** This is unacceptable.
- **The proposals also still 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. In particular, improvements are badly needed on Penny Brookes Street, International Way, and Hitchcock Lane, to provide improved connectivity to Stratford International Station, East Village, and Westfield—there are no improvements proposed to these areas, even where traffic volumes will increase. The scope of the scheme also does not extend to the poor-quality junction between Westfield Avenue and Montfichet Road.
- **The applicant should provide protected cycle tracks on International Way leading up to Stratford International station, in addition to the tracks on Montfichet Road, and they should be joined with an exemplar protected intersection keeping pedestrian and cycle conflict to the absolute minimum.** In addition, traffic could be reduced on International Way to improve the environment for pedestrians by closing it (or installing a bus gate) at the point where it crosses HS1.
- We remain deeply 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 an even more intimidating and unpleasant environment for people to cycle in,** particularly for children, families, older people, and disabled people.
 - We are not convinced it will have the desired effect of making motorists behave considerately:
 - Angel Lane has a steep gradient, and motorists will have to rev their engines to get up the hill, leading to an intimidating environment;

- at the same time, people are more likely to cycle slowly while they climb the gradient; this will create a direct conflict between people cycling and driving.
- This 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.
- We also note, and concur with, paragraph 184 from TfL's response to the original consultation from last year², where they acknowledge that the podium will likely be a desire line for cycling (from Angel Lane and Stratford town centre to the link bridge) and it is not clear how people will be stopped from cycling here. **There is a latent demand (identified in TfL's Strategic Cycling Analysis) for a safe cycling route along Angel Lane and in general across the railway line. The development of this site is the only opportunity provide a safe route to best-practice standards to fulfil this demand. It would be unacceptable and irresponsible in the context of the climate and air pollution crises, and the wider policy context at local, regional, and national levels, not to build one.**
- All best-practice guidance and policy states that it is **unacceptable** for people cycling to share the road with motor vehicles with traffic at the volumes currently seen on Angel Lane. **The proposed design is not fit for purpose and does not deliver on its stated objectives, and flies in the face of basic physics and hazard perception. It must not be built in its proposed form.**

² <http://planningregister.londonlegacy.co.uk/swift/MediaTemp/8120-147834.pdf> Page 35: "It is concerning that, as set out in the Visitor Travel Plan that cyclists will not be permitted to cycle on the podium for safety reasons, and it is considered that, regardless of any on-site design matters, a route from Angel Lane via the podium onto the Town Centre Link Bridge may be an attractive desire line to cyclists, and it is unclear how restricting cycle access could be enforced."

Background

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 Cycleway projects, which include 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 cycle 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. We recommend that TfL's Cycleway quality criteria³ should be a minimum standard for **all** roads in the Park. To clarify, this means:

- people cycling should only share space with motorised traffic where there are fewer than 500 motor vehicles in the busiest hour, and preferably fewer than 200 vehicles per hour;
- people cycling should only share space with motor vehicles where the 85th percentile speed is less than 25mph;
- lane widths are appropriate for comfortable cycling and overtaking;
- collision risk between people cycling and turning vehicles is minimised and preferably eliminated;
- kerbside activity has a minimal impact on people cycling;
- where people cycling mix with motor traffic, the flow of HGVs should be less than 5%.

Evidence from other schemes in London and worldwide shows that enabling a wider range of people to cycle is good for local businesses,⁴ reduces harmful climate-

³ <http://content.tfl.gov.uk/cycle-route-quality-criteria-technical-note-v1.pdf>

⁴ <http://content.tfl.gov.uk/walking-cycling-economic-benefits-summary-pack.pdf>

changing and particulate emissions, and has positive outcomes for people's health. This is particularly important in Newham, where as many as 7% of deaths in the borough are related to long-term exposure to air pollution.⁵ 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.**

In July 2020, the Government published **LTN (Local Transport Note) 1/20 'Cycle Infrastructure Design'**,⁶ a revised Local Transport Note with guidelines for cycling infrastructure schemes. According to the press release⁷ at the same time:

These higher standards will make clear that schemes which consist mainly of paint, which make pedestrians and cyclists share the same space, or which do not make meaningful change to the status quo on the road, will not be funded. These standards will be overseen by a new inspectorate, Active Travel England, which will be responsible for the cycling budget and help make sure schemes are compliant with the new standards.

This LTN also contains reference to new developments. For the avoidance of doubt, our view is that all new developments, particularly on the scale of the MSG Sphere, need to take the new LTN 1/20 into account, and deliver an exemplar walking and cycling scheme.

⁵ <https://www.newhamrecorder.co.uk/news/environment/public-health-england-air-pollution-figures-for-newham-2017-1-5958721>

⁶ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/906344/cycle-infrastructure-design-ltn-1-20.pdf

⁷ <https://www.gov.uk/government/news/pm-kickstarts-2bn-cycling-and-walking-revolution>

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 people arriving by car for a sold out evening or matinee event. Moreover, we believe there is a considerable suppressed demand for cycling to music events which has not been examined. This also fails to account for the general policy context and suppressed demand for cycling, including Newham Council's recent efforts to improve cycling and walking amenity by implementing a new cross-borough Low Traffic Neighbourhood in the Maryland and Odessa wards.⁸

In any case, additional car journeys 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. Furthermore, a brand new development functioning as the jewel in the crown of the Olympic Legacy should have exemplar provision for sustainable, healthy, and zero-carbon travel—this is not achieved by designing in a high modal share for the private car.

The applicant must demonstrate how they will shift the modal share away from private cars and towards sustainable modes (walking, cycling, public transport.) In short, we insist that the applicant should be targeting a modal share of 5%+ for guests at all three venues.

Trip generation calculations: the missing picture

The modal share forecasts have been calculated based on samples of large events at the London Stadium, the O2, and the 2011 census data. These are inadequate and fail to provide a true picture of the demand for cycling.

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 link from Cycle Superhighway 2 on Stratford High Street to the Park, via Warton Road, is closed to motor traffic. For extremely large

⁸ <https://www.transportxtra.com/publications/local-transport-today/news/66343/low-traffic-neighbourhood-connects-newham-and-waltham-forest/>

events (for instance, during Beyoncé's concert in 2018) 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,⁹ the Mayor, and LCC have recognised for many years. Recently, LLDC announced a £25m "green makeover" for various streets, including Montfichet Road, to bring them up to modern standards.¹⁰

We are disappointed that Chapter 7 takes the existing figures for the Stadium and simply proposes the same for the MSG Sphere. We are also disappointed that this has not been revised by the applicant in the second or third round of consultations. **For the avoidance of doubt, the status quo in terms of modal share 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 draft 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 strongly dispute the notion that a low cycling modal share is inevitable. Where music events make accommodation for people arriving by sustainable modes, people do.

⁹ https://www.london.gov.uk/sites/default/files/cycling_vision_gla_template_final.pdf Page 28: "We will do our best to improve some new schemes, such as the Olympic Park, that were given planning consent under previous regimes with insufficient provision for cycling."

¹⁰ <https://www.standard.co.uk/news/london/olympic-park-to-be-given-25m-green-transport-makeover-for-pedestrians-and-cyclists-a4115111.html>

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 2019'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



Above: Temporary overflow cycle parking for All Points East on 24th May 2019, considerably oversubscribed.

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



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.

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

Policy context: LTN 1/20 and non-standard cycles

LTN 1/20 'Cycling Infrastructure Design',¹¹ issued in July 2020, includes suggestions for cycle parking provisions for different types of land use. Standard 'Sheffield stands' or two-tier racks will not work for many kinds of adapted cycle, including tricycles, handcycles, cargo bikes, and other vehicles used by Disabled people. **Table 11-1** in the new LTN suggests a minimum of 5% total capacity as spaces for Disabled cyclists, co-located with Disabled car parking. In this case, it's unlikely this location will be appropriate, since there will still be a considerable walk between the Stratford International car park and the Sphere entrance. We suggest that parking for non-standard/adapted cycles should be available on the Sphere podium itself. Critically it must be accessible **without** dismounting or lifting one's cycle, which is impossible for many Disabled cyclists.

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 passengers' willingness to deal with overcrowding.

Stratford station operates at 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.

¹¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/906344/cycle-infrastructure-design-ltn-1-20.pdf

We are concerned that visitors to the Sphere will overwhelm the station. The result may well be that visitors—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 pleased to see the proposed new entrance to Stratford station on Montfichet Road, but are worried that, since it has no escalators, it will become a bottleneck, particularly for people who are less mobile, carrying luggage, or pushing prams. It will also not provide a direct route to the DLR or Jubilee line, which may lead to additional crowding on the platforms as visitors unfamiliar with the station layout work out where they need to go.

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.

Pavement parking and driver behaviour

We are concerned that the profiles of different kinds of events at the Sphere will draw different kinds of crowds, some of whom may be more likely to drive than others. We have a particular concern with the proposal to host ring sports, and are worried that this will lead to anti-social and dangerous parking.

On 21 December 2019, a boxing event was held at the Copper Box Arena on Copper Street. Despite the deployment of parking stewards, and messaging to guests that there was no parking at the Copper Box, scores of drivers instead chose to mount the pavement and park illegally on the shared pavement/cycleway on Copper Street. This was unacceptable and dangerous.

We are concerned that similar situations may occur for certain events at the Sphere. We are concerned that the wide pavements and cycle tracks in Stratford Town Centre will appear inviting to motorists looking for a place to park right by the venue door. We also note the behaviour of PHV drivers at previous concerts at the London Stadium, routinely mounting the pavement to drop off fares or to wait.



Above: Cars driven by visitors to the Copper Box for a boxing event on 21 December 2019, abandoned on the shared pavement/cycleway on Copper Street, obstructing people walking and cycling.

We insist that, when the venue is in operation, the applicant should fund Newham Council to employ traffic wardens and source tow trucks for the removal of antisocially-parked vehicles; they must also contribute to hard engineering measures (i.e. bollards, hostile vehicle mitigation) to ensure that the cycle tracks and pavements in Stratford Town Centre and in East Village, East Wick, and Sweetwater, cannot be mounted by drivers, be they parking for the duration of the event or dropping off/picking up guests.

Modal share and cycle parking conclusion

The proposed modal share of 0.1% for cycling, and the associated cycle parking proposal of 96 spectator spaces, is completely inadequate. We are in an air pollution and climate emergency. 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.

We are especially concerned that the smaller music venue/nightclub and members' lounge have proposed a **zero** modal share for cycling. For the avoidance of doubt, this is completely unacceptable for a 21st century development.

We also find it concerning that the environmental statement (in the technical appendix on air quality) cites the Mayor's Transport Strategy and the draft London Plan, while the application itself roundly ignores the requirements and aspirations for active and sustainable transport, reduced car dependency, and reduced air pollution.

Newham Cyclists demands:

- **Innovative solutions to unlock latent demand for cycling to the venue, to achieve a cycling modal share of 5%+ for all three venues, 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
 - **This must include provision for non-standard/adapted cycles.**
- Funding for hard engineering measures (i.e. bollards or planters) to protect the cycleways and pavements in Stratford Town Centre and in East Village, and funding of parking wardens and tow trucks to remove antisocially parked vehicles.
- A visitor travel plan that will:
 - ensure no additional overcrowding or station closures at Stratford;
 - minimise air pollution or carbon emissions around the venue, and bring travel to the venue as close to zero-carbon as possible.

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.

While we are pleased to see the minor revisions to the design, we are concerned that the designs proposed by the applicant are still 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. The design repeats of the mistakes of previous schemes in the Olympic Park.

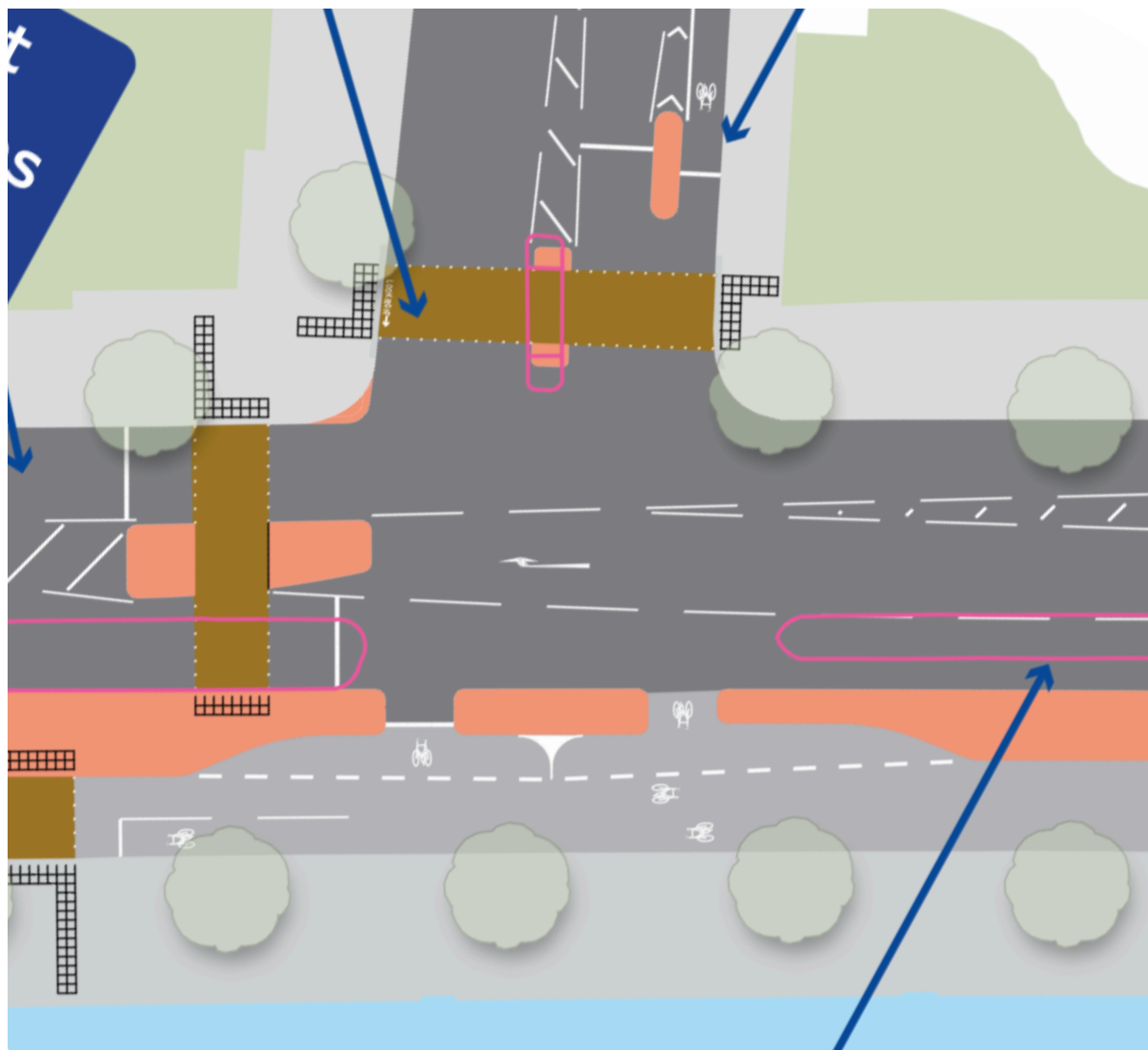
We are also disappointed that there are no improvements proposed to the surrounding streets. International Way, Hitchcock Lane, Penny Brookes Street, and Celebration Avenue are crying out to be made safer for walking and cycling—which will become more urgent when high volumes of motorists travelling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

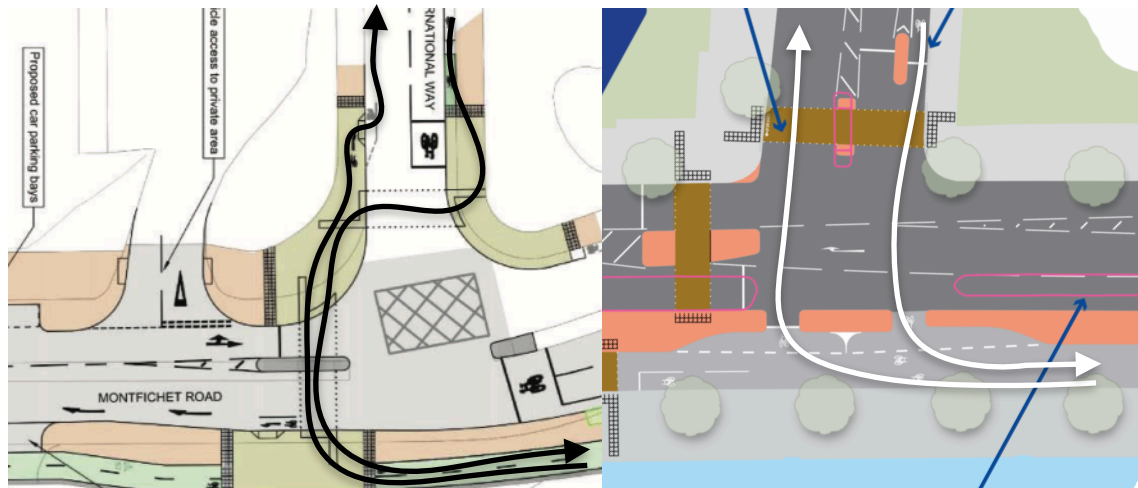


Above: An example of a side-road access from East West Cycle Superhighway (CS3) between Victoria Embankment and Horse Guards Avenue. Source: https://consultations.tfl.gov.uk/cycling/71a267bd/user_uploads/sect-1-17-combined.pdf

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.





Above: A side-by-side comparison of the expected cycle movements on Montfichet Road/International Way (**left**) and Victoria Embankment/Horse Guards Road (**right**) for a cyclist leaving the cycle track by turning right, and joining the cycle track by turning left. Note that the Victoria Embankment example allows people to make a gentle, smooth turn, and does not require them to make sharp turns, mount the pavement, or double back on themselves.

Junctions and pedestrian crossings

Shared footways at junctions, as seen at the junctions with Hitchcock Way, International Way, and the existing poor quality shared footway 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.
- The Embankment 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 crossings shared with pedestrians.

General design notes

- As a general rule, it is preferable for cycleways to be adjacent to the carriageway. This is because pedestrians will generally want to avoid walking between two lanes of moving traffic. Some people may also see the railway wall as a tempting place to stop, rest, and linger (for instance, to adjust their hold on their luggage, check their phone, fasten their shoelaces) and, at various points in the proposed design, that means they would be standing 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.

Table 6.25 in Chapter 6, *Highways, Transport and Movement* indicates an uplift of **33%** on vehicle flows on International Way, but we think this figure is suspiciously small. Bear in mind that a large number of vehicles will be using the HS1 car park, and PHV apps (such as Uber) will set people's pick up locations as International Way. All of these will be in direct conflict with safe cycling, at exactly the time people will be leaving the venue, including by cycle.

As a result, at a very minimum we insist on 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. Ideally this would be a bidirectional track on the north side of International Way, with hard measures (i.e. bollards and kerbs) to prevent short-stay drivers from parking or waiting in them.

In addition, traffic could be reduced on International Way to improve the environment for pedestrians by closing it (or installing a bus gate) at the point where it crosses HS1.

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. We would also like to see protected cycle tracks on Penny Brookes Street connecting with Angel Lane/Leyton Road.

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 Cycleway 16 (formerly known as Quietway 6) on Honour Lea Avenue, and onwards to Ruckholt Road via the newly-upgraded 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;**
- **protected cycle tracks on International Way to best-practice standards, connecting the new Montfichet Road cycleway to Stratford International station and East Village; and potentially reducing traffic on International Way by closing it to general traffic where it crosses HS1;**
- **that the opportunity is taken to make considerable improvements to Penny Brookes Street, Hitchcock Lane, and Celebration Avenue. These roads require protected cycle tracks to connect with the route on Montfichet Road, and to Cycleway 16 (formerly 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 Analysis¹² (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.

There is also a considerable existing severance issue caused by the railway line, which is a barrier to cycling journeys from Stratford Town Centre into the whole of the Olympic Park. Cycling is not permitted on the existing Town Centre Link Bridge, but many people cycle here anyway because there is no safe alternative.

There are also no direct traffic-free cycle routes from Stratford Town Centre (the former gyratory) into the Olympic Park—the nearest (and currently only) traffic free route is via the Greenway, involving a 750m diversion via Cycle Superhighway 2 (including some junctions with a significant left hook risk.)

It is critical that this opportunity is taken to provide a safe, traffic-free route for people to cycle directly between the Olympic Park and Stratford Town Centre. Short of, in future, building a new tunnel or bridge, there will be no further opportunities to address this major severance issue.

We note, and agree with, TfL's understanding from their response to the first consultation¹³ that a direct route from Stratford Town Centre and Angel Lane onto the Town Centre Link Bridge will likely be a key desire line for cycling:

"It is concerning that, as set out in the Visitor Travel Plan that cyclists will not be permitted to cycle on the podium for safety reasons, and it is considered that, regardless of any on-site design matters, a route from Angel Lane via the podium onto the Town Centre Link Bridge may be an attractive desire line to cyclists, and it is unclear how restricting cycle access could be enforced."

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, from table 6.38:

¹² <http://content.tfl.gov.uk/strategic-cycling-analysis.pdf>

¹³ <http://planningregister.londonlegacy.co.uk/swift/MediaTemp/8120-147834.pdf>

Cyclists / Severance and Amenity / Montfichet Road and Angel Lane: Highway proposals for Montfichet Road and the A112 Angel Lane improve the conditions for cyclists, reducing severance and improving amenity.

We also note, from DP9 Ltd.'s road user safety report in the most recent application documents:

5.13 The proposal is to terminate the advisory cycle lane to instead provide a consistent carriageway width, where possible, as well as integrating a raised table through the location at which the existing redundant junction is located, to provide a level of vertical deflection and help reduce vehicle speeds. This will ensure cyclists gain a primary position on the road and prevent vehicles from attempting to overtake cyclists. There is a further controlled pedestrian crossing, coupled with a raised table, immediately south of Windmill Lane that will also help in reducing vehicular speeds in the location where the cycle lane is terminated. These design measures are expected to ensure this stretch of highway is safe for vehicles, cyclists and pedestrians.

We dispute this analysis of the proposed scheme on Angel Lane in the strongest possible terms. For the avoidance of doubt, narrowing the carriageway and forcing people to 'take the lane' in front of motor traffic does not, in any way, constitute an improvement in cycling amenity.

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, families, 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—there are many examples of drivers becoming impatient, and then inflicting 'punishment passes' on cyclists who have taken the lane when the opportunity arises.
- **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 be cycling more slowly.

Designing infrastructure that expects people to cycle ‘assertively’ in the centre of the lane, and share space with motor vehicles, is a failed policy. Countries with a high cycling modal share, such as the Netherlands, have abandoned designs which rely on this.¹⁴ 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.

When cycling in the carriageway is acceptable

TfL’s cycle route quality criteria state that mixing cycling with 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)¹⁵;
- 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

DP9 Ltd’s Road User Safety Report cites an automated traffic count survey conducted in March 2018. Table 6 in this report notes that there were **10,364** vehicles per day on Angel Lane, including **526** in the AM peak and **669** in the PM peak. In both cases the number of pedal cycles was nominal. The percentage of HGVs and buses averaged 13%.

¹⁴ <https://bicycledutch.wordpress.com/2015/04/07/another-new-bicycle-street-in-utrecht/>

¹⁵ <http://content.tfl.gov.uk/cycle-route-quality-criteria-technical-note-v1.pdf>

We note the absence, in the planning application, of any details 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. This will not be fixed by narrowing the carriageway, and may indeed increase danger by forcing driving and cycling into the same space.

Policy context (LTN 1/20) - i.e. why Angel Lane constitutes a critical failure

LTN 1/20¹⁶, issued by the Department for Transport in July 2020, contains, as one of its key principles that “[cyclists] must be physically separated and protected from high volume motor traffic, both at junctions and on the stretches of road between them” (1.6.1 point 3, pp 10.)

Figure 4.1 in LTN 1/20 (pp 33) indicates that, when traffic levels exceed 6000 pcu/24 hour, sharing the lane with traffic is, at best, ‘not suitable for all people,’ and at worst ‘suitable for few people and will exclude most potential users’ from a cycling perspective. This is also predicated on a 20mph speed limit, which, as we stated above, we doubt drivers accelerating to get up the steep gradient on Angel Lane will adhere to.

¹⁶ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/906344/cycle-infrastructure-design-ltn-1-20.pdf

Furthermore, in Appendix 1 in LTN 1/20, the Cycling Levels of Service Tool (pp 174) when applied to Angel Lane indicates **two critical failures** with the proposed design:

- “Cyclists should not be required to share the carriageway with high volumes of motor vehicles. This is particularly important at points where risk of collision is greater, such as at junctions.” The ‘critical failure’ range is **>10,000 average daily traffic** (exceeded by 10,364 vehicles per day as measured in the road user safety report) and **>5% HGV traffic** (probably exceeded by 10-17% HGV+bus combined traffic in the traffic count.)
- “Where speed differences and high motor vehicle flows cannot be reduced cyclists should be separated from traffic...” The ‘critical failure’ range here is: **‘Cyclists sharing carriageway – nearside lane in critical range between 3.2m and 3.9m wide and traffic volumes prevent motor vehicles moving easily into opposite lane to pass cyclists.’** The proposed ‘consistent carriageway width’ on Angel Lane is 6.5m (see Transport Assessment, Appendix Highways, Transport and Movement, 5.6.3, pp 72), meaning the nearside lane would be 3.25m wide, putting it inside the ‘critical range’ that means it is too narrow to allow safe overtaking, and too wide to physically prevent motorists from attempting to overtake. **This is a critical failure.**

For the avoidance of doubt, a ‘critical fail’ means that the proposed scheme represents unsafe conditions for cycling, which must be addressed (or an alternative route found.) LTN 1/20 states: “Only schemes with a minimum score of 70% under the CLoS, no critical fails and under the JAT no red-scored turning movements will generally be considered for funding. Where schemes are proposed for funding that do not meet these minimum criteria, authorities will be required to justify their design choices. “

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;
- Some motorists are simply impatient.

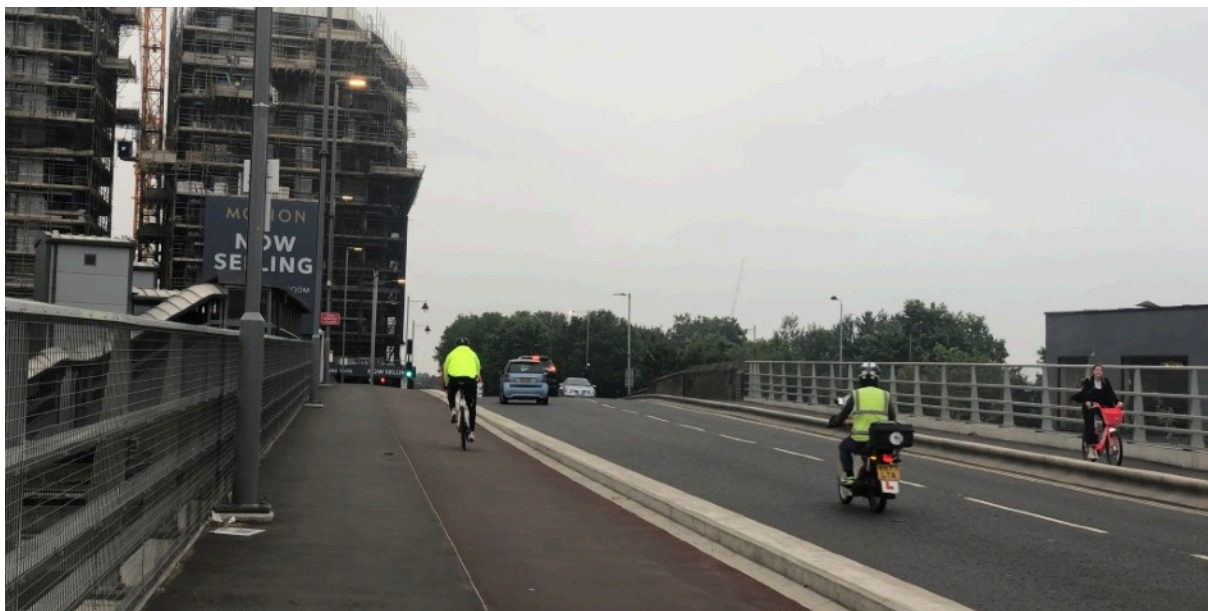
It is not reasonable to expect people cycling to put up with motorists bullying them. We think it's also likely that this further excludes under-represented groups from cycling, particularly women and people of colour.

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

A104 Lea Bridge Road, Cycleway 23, has been the flagship scheme of the Waltham Forest “Mini Holland” programme. At the time of writing, Waltham Forest Council has completed the installation of 4km of fully-protected cycle tracks on this important high street: busy not only with cars and buses, but also with 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.¹⁷ 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 railway bridge, Waltham Forest. This bridge was extended to provide space for separated cycle tracks on both sides. Both directions are well-used.

¹⁷ <https://procontract.due-north.com/ContractsRegister/ViewContractDetails?contractId=f9ef148d-c208-e711-80dd-005056b64545>

The installation of this scheme, and its continuous levels of physical protection from motor traffic, have paid dividends. Lea Bridge Road saw an increase of 118% in the number of people cycling between July 2016 and July 2019—before the route was even completed.¹⁸ The route has already been eastwards to the Waterworks Roundabout by Waltham Forest and is being extended further still as a ‘Streetspace’ scheme along Woodford New Road, and TfL have presented proposals to extend it westwards towards across Lea Bridge Roundabout and towards central London. The section of Lea Bridge Road near the Lea Valley Riding Centre routinely sees almost 2,000 cyclists every weekday in the post-COVID scenario—and that’s only in one direction, using the cycle track on the north side of Lea Bridge Road.

Where space is made to provide high-quality, physically protected routes for cycling, people use them. It is critical that such routes offer a continuous level of protection from motor traffic to provide a safe and comfortable experience for everyone. As demonstrated by the success of the scheme on Lea Bridge Road, only protected (segregated) cycleways will make people feel safe when cycling on the same route as through motor traffic.

¹⁸ <https://tfl.gov.uk/info-for/media/press-releases/2019/december/next-phase-of-waltham-forest-cycleway-will-make-it-easier-than-ever-to-travel-around-the-area-by-bike>

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. The proposals are in direct conflict with best practice standards and guidance, and will be actively harmful. **For the avoidance of doubt, this is a critical failure and the planning application should be rejected until these issues are resolved to an acceptable standard.**

Newham Cyclists demands:

- **A direct, safe cycling link between Stratford Town Centre and the Olympic Park**, usable without dismounting and without mixing with motor traffic at **all** hours of the day and night. The options for this are:
 - High quality protected cycle tracks in both directions, to best-practice standards, on Angel Lane.
 - If possible, the road could be widened at its narrowest point to make space for motor traffic, cycle tracks, and pedestrian areas. Alternatively the existing traffic signals could be moved to signalise traffic in alternating directions at the pinch point.
 - Cycle tracks must connect to the exemplar cycle track on Great Eastern Road, and then via Stratford Town Centre to Cycle Superhighway 2. They must also connect via Penny Brookes Street to the new cycleway on Montfichet Road.
 - The cycle tracks must also have scope for extension up Leyton Road along Route 7 identified in TfL's Strategic Cycling Analysis.
 - Alternatively: a cycle track on the new footbridge over the railway line to connect with International Way junction, with the separated cycle track to be usable for cycling even when Sphere egress is in progress.
- Ideally, **both of these options should be provided** to provide a more direct 'off-peak' route from Stratford into the Olympic Park.

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.”¹⁹
 - 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.
- **Cycle hire:**

¹⁹ <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 a stipulation that the Santander Cycles docking station at the station will be expanded (at least doubled in capacity),** and kept available for use before and after major events. An arrangement similar to football matches at the Stadium, where docking stations are unusable for several hours either side of matches, is unacceptable.
- **We also insist that there must be formalised arrangements for the parking and hiring of dockless hire cycles.** We recommend a similar approach to the experimental approaches being undertaken in Hackney (suspending an on-street parking bay and using these for dockless cycles) and the City of London (marked boxes on the pavement for the parking of dockless cycles.) Failing to provide a formalised arrangement for this will result in cycles being left on pavements and cycle tracks, causing obstructions to people walking and cycling and presenting a severe danger to visually impaired people.
- **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 and the London Aquatics Centre turning left across the path of people cycling.
 - We are concerned to note from table 6.25 that there are expected to be another 134 movements (an 11% uplift) on Warton Road, thereby increasing the left-hook risk at this already dangerous junction.
 - **We insist, at a bare minimum, that the Applicant should provide funding to replace this dangerous junction with a design where left-turning motorists onto Warton Road are separated from people cycling straight ahead.** The junction must be made safe **before** the Sphere begins operations.
 - On West Ham match days and other major Stadium event days, Warton Road is closed (including on West Ham match days). We cannot see any indication of proposed traffic flows to the Sphere and the associated car parks when this arrangement is in place. The applicant must adequately explain how people will drive to the Sphere on these days, and fund measures to mitigate any additional road danger from these movements.
- **Monier Road bridge:** The Monier Road (H14) 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 visiting the Sphere to

bypass Stratford High Street by rat-running through residential streets, including Fish Island and the future East Wick and Sweetwater developments, 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.)²⁰
- **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.

²⁰ <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 proceed without the major issues we have highlighted being addressed satisfactorily. If the applicant can not remedy these problems, then the Planning Committee should reject the application.

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 concerned that it does not follow best-practice guidance from TfL and DfT. We insist that any new scheme must be designed with LTN 1/20²¹ in mind, and must not contain any critical fails as per the Cycling Level of Service (CLOs) tool.

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%+ at all three venues**. They must also **provide provision for non-standard/adapted cycles used by Disabled cyclists**. 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. **They must also fund hard engineering measures and enforcement to keep pavements and cycleways around the venue clear from antisocially parked vehicles.**
- **The applicant must revise their designs for Montfichet Road to best practice standards**, reducing conflict between people walking and cycling to a minimum. They must also **provide protected cycle tracks on International Way to serve Stratford International Station and connect onto Montfichet Road**, and **redesign the dangerous junction with Penny Brookes Street.**

²¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/906344/cycle-infrastructure-design-ltn-1-20.pdf

- **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. Failing this, a cycle track must be provided on one of the bridges across the railway line—to be usable by people cycling at all times, including during event egress, and to be accessible from street level on both sides without dismounting.**
- **The applicant must fund safety improvements to remove the left-hook risk at the Warton Road junction on Stratford High Street, to be fixed before the Sphere begins operations.**

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