



MOVE

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1 Introduction

Background

- 1.1 The Olympic Delivery Authority (ODA) was established by the London Olympic Games and Paralympic Games Act 2006. One of the requirements of the Act is that the ODA prepare (and keep under review) a Transport Plan for the London 2012 Olympic and Paralympic Games. The first edition of the Transport Plan was published in October 2007, and was subject to a Strategic Environmental Assessment (SEA) at that time¹.
- 1.2 More recently, the ODA published a consultation draft of the second edition of the Transport Plan in December 2009², which incorporates feedback from the first edition of the Plan. The consultation period on the revised Plan ran until March 2010, and a final second edition, taking account of the views received was published in June 2011³.
- 1.3 The Transport Plan sets out the strategic guidelines and operational principles for transport systems and operations for every mode of transport for the London 2012 Olympic and Paralympic Games. The Transport Plan presents the mission, objectives, key strategic directions and programmes that will form the basis of the forthcoming planning and delivery of transport for the Games.
- 1.4 Under the European Directive 2001/42/EC⁴ all national, regional and local authorities must carry out an SEA of certain types of plans, of which transport is one. In England, the Directive has been implemented via regulations⁵ (referred to here as 'the SEA Regulations'). The Transport Plan is a requirement of an Act of Parliament, which makes it a 'Statutory Plan' within the meaning of the SEA Regulations, and therefore is required to undergo an SEA.
- 1.5 The production of the second edition of the Transport Plan has also required the SEA to be reviewed and updated. This is because the SEA Regulations state that an assessment has to be carried out where a plan is modified except "*for a minor modification to a plan or programme*" (Regulation 5(6)(b)).
- 1.6 The SEA aims to ensure that environmental impacts are taken into account at the earliest stages and throughout plan development. Its main objectives are to:
- provide for a high level of protection of the local environment; and

¹ Olympic Delivery Authority (2006) – **Strategic Environmental Assessment of the Transport Plan for the London 2012 Olympic Games and Paralympic Games: Environmental Report**, October 2006

² Olympic Delivery Authority (2009) – **Transport Plan for the London 2012 Olympic Games and Paralympic Games, Second Edition** – Consultation Draft December 2009.

³ Olympic Delivery Authority (2011) – **Transport Plan for the London 2012 Olympic Games and Paralympic Games** Second Edition June 2011.

⁴ Directive 2001/42/EC of the European Parliament and of The Council on the Assessment of the Effects of Certain Plans and Programmes on the Environment – O.J. No. L 197, 21.07.2001, p30. Available at www.ec.europa.eu

⁵ The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004 No.1633).

- contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes to promote sustainable development.

The Post-Adoption Statement

1.7 This document is the Post-Adoption Statement required by the SEA Regulations. Its purpose is to summarise how the SEA process has affected the content of the Transport Plan. The Department for Transport's Guidance on SEA⁶ states it should be:

'a statement summarising how environmental considerations have been integrated into the plan and how the Environmental Report of Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8, and the reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with proposals for monitoring.'

1.8 The prescribed coverage of the Post-Adoption Statement is⁷ as follows:

- a statement that the Plan or programme has been adopted, indicating the date this happened and the address (which may include a website) at which a copy of the Plan as adopted, the accompanying Environmental Report, and this Post-Adoption Statement may be viewed, or from which a copy may be obtained;
- how environmental considerations have been integrated into the Plan;
- how the Environmental Report has been taken into account;
- how opinions expressed by the statutory consultation bodies in response to consultation with them have been taken into account;
- how the results of any consultations with other relevant stakeholders on the Environmental Report have been taken into account;
- the reasons for choosing the Plan as adopted, in the light of the other reasonable alternatives dealt with in the SEA; and
- the measures that are to be taken to monitor the significant environmental effects of the implementation of the Plan.

1.9 A checklist of the specific requirements of the SEA regulations has been drawn up to ensure the comprehensiveness and compliance of this report – see **Table 1** on the following page.

⁶ Department for Transport (2009) - **Strategic Environmental Assessment for Transport Plans and Programmes** - Transport Analysis Guidance (TAG) Unit 2.11 (updated draft). Quote extracted from Table 2.2. Stages, decisions and outputs of SEA.

⁷ Set out in Regulation 16(3) of the SEA Regulations.

Table 1 SEA statement – checklist developed from SEA regulations

Information to be included	Location in this document
How the environmental considerations have been integrated into the plan or programme.	Section 2.
How the environmental report has been taken into account.	Section 2, as well as in the consultation responses (Section 3 and Appendix A).
How opinions expressed in response to consultation have been taken into account.	Section 3. Further detail is also given in Appendix A.
The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with.	Section 4.
The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.	Section 5.

1.10 Further information has been included in this report, some of which was suggested by guidance offered by Transport Research Laboratory (TRL)⁸, as this was seen to add value to the document. For example, detailing the SEA authors, other contributors and issuing dates. The TRL guidance also advised on the overall structure of the report.

SEA authors, contributors and outputs

1.11 The ODA commissioned independent consultants to undertake the SEA for the Transport Plan and then produce this Statement to meet the requirements of the SEA Regulations. Members of the ODA’s Transport and Sustainability teams have also contributed to this process, supplying information and feedback on work in progress.

1.12 The following documents have been produced to date, and can be accessed at the locations given in **Table 2** on the following page.

⁸ TRL, November 2005, **Strategic Environmental Assessment of Local Implementation Plans: SEA Statement**, produced for Association of London Government. Available from www.sea-info.net

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Table 2 SEA documents produced to date

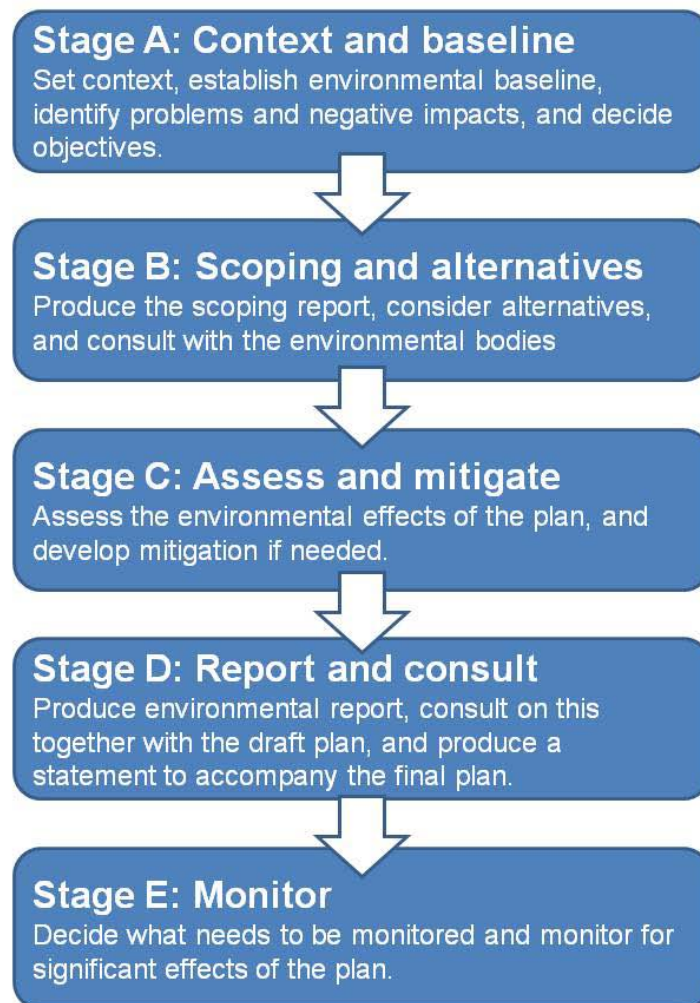
Document	Date	Purpose	Where to access
SEA Scoping Report	Sept 2006	Set context, environmental baseline, identify problems and negative impacts and decide objectives. Document distributed for consultation with environmental bodies.	Olympic Delivery Authority 23rd Floor One Churchill Place Canary Wharf London E14 5LN
Consultation Draft Transport Plan and Environmental Report	Oct 2006	Assessment of the environmental effects of the draft plan. Addressing consultation responses, suggesting mitigation methods and possible SEA indicators to include in the Transport Plan.	Olympic Delivery Authority 21st Floor One Churchill Place Canary Wharf London E14 5LN
Adopted Transport Plan, Environmental report and SEA Post-Adoption Statement	April 2008	To ensure that the environment has been taken into account at every stage and that information collated has influenced the final shape of the Transport Plan.	Olympic Delivery Authority 21st Floor One Churchill Place Canary Wharf London E14 5LN
SEA Scoping Report	May 2010	Set context, environmental baseline, identify problems and negative impacts and decide objectives. Document distributed for consultation with environmental bodies.	Olympic Delivery Authority 21st Floor One Churchill Place Canary Wharf London E14 5LN
Consultation Draft Transport Plan (second edition) and Environmental Report	Feb 2011	Assessment of the environmental effects of the draft plan. Addressing consultation responses, suggesting mitigation methods and possible SEA indicators to include in the Transport Plan.	Sent to stakeholders and available on request from ODA offices (see address above). Also available on London 2012 website (www.london2012.com/publications)
Adopted Transport Plan, Environmental report and SEA Post-Adoption Statement (this document)	July 2011	To ensure that the environment has been taken into account at every stage and that information collated has influenced the final shape of the Transport Plan.	Sent to stakeholders and available on request from ODA offices (see address above) and available on London 2012 website (www.london2012.com/publications)

2 The SEA process

The process and stages completed to date

- 2.1 The SEA is an iterative process as the plan (in this case, the Transport Plan) is developed. The process can be broken down into five stages, as shown in **Figure 1** below.
- 2.2 Stages A and B culminated in the production of the SEA Scoping Report in May 2010. Stages C and D were completed to coincide with the publication of the Consultation Draft of the Transport Plan in February 2011.

Figure 1 SEA key stages⁹



⁹ Adapted from ODPM (2005) – **A Practical Guide to the Strategic Environmental Assessment Directive** – Figures 5 and 6.

- 2.3 At Stages B and D, the three statutory environmental bodies (the Environment Agency, English Heritage and Natural England) were consulted during the scoping stage and when the Draft Transport Plan and the Environmental Report was published. Their comments were noted and taken into account (see **Appendix A**). The environmental appraisal of the Transport Plan strategies then took place, and has been written up in the Environmental Report¹⁰ (Stage D).
- 2.4 The production of this Statement, to accompany the first edition of the Transport Plan, is part of Stage D. The final stage monitoring will be an ongoing practice, which will be part of the ODA's wider sustainability programme during the life of the Transport Plan as appropriate.

How the SEA influenced the Transport Plan

- 2.5 As required by the SEA Regulations, during the preparation of the Consultation Draft of the Transport Plan, on the basis of the information available at that time, the SEA examined the likely environmental effects on:
- biodiversity;
 - population;
 - human health;
 - fauna;
 - flora;
 - soil;
 - water;
 - air;
 - climatic factors;
 - material assets;
 - cultural heritage, including architectural and archaeological heritage;
 - landscape; and
 - the interrelationship between all these factors.
- 2.6 The key conclusions of the SEA, as set out in the Environmental Report were that:
- there were no reasonable alternatives to the strategy that was set out in the consultation draft of Transport Plan that could have been identified;
 - there was very little within the strategy and proposals in the Transport Plan that was likely to have a significant adverse effect on the environment;
 - the planning principles on which the Transport Plan strategy had been based, particularly maximising the use of existing infrastructure and

¹⁰ Olympic Delivery Authority (2011) –**Transport Plan for the London 2012 Olympic Games and Paralympic Games: Strategic Environment Assessment Environmental Report** , February 2011.

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services, mean that the environmental effects of measures proposed in the Transport Plan will be of a relatively minor extent;

- the duration of the period for which the Transport Plan will be operational (ie, only for some two months) means that all the environmental effects identified will be temporary in nature; and
- it is unlikely that there will be any significant adverse environmental effects that will arise from the operation of the measures contained in the Transport Plan.

2.7 The Environmental Report also recognised that the Consultation Draft of the Plan already included measures that had been specifically included to avoid or prevent adverse environmental effects, including:

- making best use of existing public transport and supplementing them, where necessary, with enhanced service levels or temporary additional services, such as park-and-ride or shuttle buses during the Games;
- designing new venues, such as the Olympic Park, to ensure that adequate provision is made for public transport, walking and cycling to maximise the accessibility of the venue by non-car modes;
- choosing venue locations specifically to minimise journey times between athlete accommodation and their training and competition venues;
- maximising the use of the rail networks to make best use of the capacity of this mode for spectator and workforce travel, and supplementing these with local bus services, coach operations, and park-and-ride and shuttle bus services;
- promoting walking and cycling to all venues;
- where appropriate, using opportunities provided by the River Thames as alternative transport options; and
- using procurement and travel planning to minimise oversupply and to maximise the efficient utilisation of resources.

2.8 Other measures were included in the Transport Plan to help manage the extent and magnitude of environmental effects, and help ensure that these remain at acceptable levels:

- No private car parking provided for spectators at any venue, except for some disabled parking.
- Strict parking controls will be implemented on a temporary basis around each venue to support the above measure.
- Management of background demand (non-Games) by a wide variety of measures to reduce commuter and other non-Games travel on key routes during the Games.
- A variety of temporary traffic management measures will be implemented along the Olympic Route Network (ORN) and Paralympic Route Network (PRN) to ensure reliable journey times for Games Family vehicles and

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minimise the impact of Games traffic on other road users. These measures may include, but are not limited to: alterations to signal timings; restricted turns and/or road closures; junction improvements; Games Lanes; and diversion routes.

- Establishing a Transport Coordination Centre (TCC) to assist Transport for London (TfL), other transport operators, the police, local authorities and those running the Games to keep London moving.
- An 'Active Spectator Programme' to ensure that active travel modes such as walking and cycling are used as effective transport modes. Together with the local air-quality issues, this programme will also make a contribution to the Healthy Living theme.
- Athletes, team officials and accredited media will be able to travel on all public transport within the Greater London area free of charge.
- People working at London 2012 venues will be expected to travel by public transport, walking and cycling, although this will be supplemented by Games-specific bus services to ensure essential staff can travel to and from work early in the morning or very late at night.
- A comprehensive information and ticketing strategy to manage travel demand and influence the proportion of spectators that travel by different modes and on particular routes.
- Utilising London's waterways to provide an alternative mode to access various competition venues, either as part of a longer journey, or as a single trip.
- A 'marketing relationship' has been developed with each spectator as soon as an enquiry about tickets were made. This relationship enables transport information to be tailored to individual needs, as well as assist in the planning of spectator transport services. During the Games real-time travel and service information will be provided to passengers through a variety of media, including displays at stations and bus stops and via new media channels, for example, internet and SMS.
- The Olympic Park and all venues will be designated as Low Emission Zones (LEZs) during the Games, and only vehicles under five years old that meet pre-determined noise and emissions standards will be allowed into the LEZ.
- A Games Low-Emission Venues Emissions Standards for petrol and diesel vehicles has been set, which become effective as soon as the LOCOG Vehicle Access and Parking Permit (VAPP) process comes into effect at a venue or, where a VAPP is not required as soon as a supplier delivers to the venue. For each vehicle type, the standards set:
 - the recommended emission standard to be used wherever practical;
 - the minimum emission standard acceptable for entering or use in Games venues; and

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- the LEZ standard applicable to diesel vehicles driving in Greater London.

The use of other low-emission vehicles (gas/electric powered) that exceed these standards are admissible provided that there is evidence of the permanent use of this. In addition vehicles that are retrofitted with a suitable pollution abatement device to reduce emissions, such as a Diesel Particulate Filter, is considered a cost-effective solution for improving certain vehicle types (i.e. coaches) that would otherwise be too costly to replace. Vehicles fitted with filters on the London LEZ approved list are considered an acceptable approach as long as they meet the standards set by the London LEZ. This will help minimise the amount of carbon dioxide emissions due to the Games and emissions of other pollutants that can contribute to poor local air quality, with consequential impacts on some human health conditions and local wildlife populations.

- 2.9 Sustainability guidelines have been developed by the ODA to ensure that sustainability is at the heart of all the transport operations and infrastructure projects and planning. They address the environmental impacts such as noise, ecological, landscape, archaeological, light spill and the implementation of contingencies in the event that damage is caused. It reiterates the need to ensure that 100 per cent of spectators travel by public transport, walk or cycle and reduce the distance, travel time and number of journeys required to lower the impact on emissions and congestion. These will be integral to the Venue Transport Operations Plans for each of the venues.
- 2.10 Consequently, no specific further mitigation measures were identified in the Environmental Report.
- 2.11 Taking account of the findings of the Environmental Report, the Second Edition of the Transport Plan incorporated additional chapters specifically dealing with issues raised by the SEA and the specific consultations on the SEA Scoping Report and Environment Report.
- 2.12 An updated chapter on sustainable transport highlights the commitment of the ODA and the London Organising Committee for the Olympic Games and Paralympic Games Ltd (LOCOG) to work together with their stakeholders to maximise the economic, social, health, environmental and sporting benefits the Games bring to London and the UK, particularly through the medium of the Transport Plan. The chapter also specifically identifies that:
- The London 2012 Sustainability Plan Towards a One Planet 2012 was published in November 2007 and a revised Plan was published in December 2009. The Plan includes further information on how the objective 'To prioritise walking and cycling and the use of public transport to and within the Olympic Park' in the ODA's Sustainable Development Strategy will be achieved and how progress will continued to be monitored. The ODA is investing in walking and cycling infrastructure though the London 2012 Active Travel Programme, in partnership with LOCOG and TfL. The ODA is also working with local authorities, the NHS, Sustrans, the Ramblers and Walk England and other organisations across the UK. The Active Travel Programme which was launched during 2011.
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- The Transport Sustainability Forum continues to share information and knowledge about the delivery of a sustainable Games with its delivery partners and key stakeholders. The ODA is working with key stakeholders and statutory authorities such as Natural England and the Environment Agency where directly managed spectator transport operations are required at venues, for example park-and-ride. Together, the ODA and these organisations are exploring the opportunity to provide environmental enhancements and long-term benefits by replacing low ecological value with higher level biodiversity at venues such as Weymouth and Portland and Eton Dorney as a result of interventions required for local park-and-ride sites.
- The ODA was independently certified to BS 8901:2009 'Specification for a sustainability management system for events' in February 2010 and received the London Excellence Award for Management Systems in July 2010 in recognition of obtaining the BS8901:2009 and ISO 9001:2008 (Quality) and OHSAS 18001:2007 (Health and Safety) standards. Consequently the ODA aspires to host the Games in compliance with BS 8901 and published 'Sustainability Guidelines for corporate and public events' in May 2010 to aid this. ODA Transport has gone on to gain certification to ISO 20121 the International standard in sustainable event management.

2.13 The ODA and LOCOG have commissioned further studies that will contribute to the development of the overall strategy, including:

- The first London 2012 Sustainability report, 'A Blueprint for change' was published in April 2011, which covers the whole London 2012 programme for the calendar year 2010. The report sets out how London 2012 is taking sustainability considerations into new areas, covering the key sustainability themes set out in the Sustainability Plan. Key highlights include:
 - Olympic Park construction nearing completion - on time, within budget and setting new standards in sustainability. All venues and new infrastructure have been designed and built according to stringent sustainability targets.
 - Low-carbon Games -a new methodology has been developed for assessing potential future carbon emissions, which is helping to reduce the carbon footprint.
 - Sustainability Code - sustainability has been embedded in the procurement process and has enabled effective monitoring of the Games supply chains.
 - Sustainability is at the core of operational planning for events.
- The Pre-Games sustainability report, 'Delivering change' was published in April 2012, which covers the establishment of new sustainability standards, from construction to event management. Key highlights include:

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- The Olympic Stadium, which is the most sustainable Olympic stadium ever built. The Olympic Park itself is developing a mature landscape and providing new wildlife habitat and significant flood alleviation.
 - London 2012 is the first summer Games to measure its carbon footprint over the entire project term and utilises this information to inform delivery of the Games.
 - Sustainable Sourcing Code - sustainability is embedded in the procurement process.
 - Zero Waste Games Vision - commitment to delivering a zero waste to landfill Games.
 - Sustainable transport - commitment to the delivery of a public transport Games and the launch of the Active Travel Programme to achieve extra journeys by walking and cycling in London during the Games.
 - Stringent sustainability requirements for catering operations for the Games.
 - Air Quality:
 - The ODA has undertaken a significant amount of strategic highway modelling to gauge the potential effects of Games-time highway interventions. These include the Olympic Route Network (ORN), Paralympic Route Network (PRN) and associated measures including: changes to traffic signal timings; local area traffic management and parking proposals around venues; movement management areas; local authority schemes; and travel demand management. Due to the complex interactions of these interventions, and the likely geographical extent of the effects, the highway model can consider the effects of these interventions in their entirety.
 - TfL has been a key participant in the specification, development and sense checking of the strategic modelling work and the ODA and TfL have worked together to assess the potential air quality effects of the highway measures. The ODA, TfL and TfL's air quality contractors have undertaken detailed air-quality modelling along the ORN, PRN and in adjacent areas, which is entirely consistent with work already undertaken, in order to assess the effects that these measures might have. The findings of the assessment are presented in 'The emissions and air quality impacts of the 2012 Olympic Route Network and related traffic management arrangements', a report published in March 2012. The modelling indicated that there is expected to be a small net reduction in PM₁₀ and NO_x emissions within London and concentrations are projected to see a slight and temporary increase in a handful of areas. The ODA and TfL have agreed proposed mitigation measures, which include retrofitting buses with specialist equipment to reduce NO_x emissions and the application of dust suppressants along key corridors such as the A12 and A13.
 - Carbon footprint study:
-

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- The ODA and LOCOG have measured the carbon footprint of the Games through the Carbon Footprint Study, which was last reported upon in March 2010. It is the first summer Games to undertake a carbon footprint study that takes into account embodied and operational emission from Bid win to Closing Ceremony.
- Environmental Assessments:
- The ODA has achieved planning consent for a number of venues that were subject to an Environmental Assessment, which have identified a number of mitigation measures to be included in the operational plans for these venues. These include:
 - Eton Dorney - Pollution Incident Management Strategy to deal with potential hydrocarbon spills, habitat surveys to inform site layout and temporary protective fencing specified to protect against accidental damage to trees.
 - Weymouth and Portland - Pollution Incident Management Strategy to deal with potential hydrocarbon spills, habitat surveys, archaeological assessment to mitigate any impact on the possible Roman road, temporary protective fencing specified to protect against accidental damage to trees, minimising the impact on the landscape character through carefully designed lighting, protection of retained planting and full restoration of the site at the end of the contract.
 - Hadleigh Farm - Pollution Incident Management Strategy to deal with potential hydrocarbon spills and provision of spill kits around the site.

2.14 An important point to note is that the transport strategy for the Games includes a commitment to maximise the use of public transport travel modes for spectators and the workforce. No public car parking will be provided at any venue, except for some pre-booked Blue Badge parking. Moreover, ticket holders will receive a Games Travelcard to use on public transport within Zones 1–9 of the Greater London area on the day of their sports event ticket.

3 Consultation

Stages of consultation

- 3.1 Consultation is an integral part of the SEA and is specified by the SEA Directive (2001/42/EC). The SEA Regulations set out requirements for consultation and information provision throughout the timescale of the plan-making process.

Consultation at the scoping stage

- 3.2 Consultation took place on the two main reports, the Scoping Report and the Environmental Report, and was managed by the ODA. This approach is compliant with the SEA Regulations Consultation at the scoping stage. During the preparation of the Scoping Report, the ODA held a meeting with representatives of the statutory environmental consultees on 13 May 2010. At the meeting, a presentation was delivered explaining the basis on which the scoping work was being done and the likely outcomes of it. The ODA forwarded copies of the Scoping Report to the statutory environmental bodies in May 2010, and formally invited their comments on it. These comments were taken into account when carrying out the assessment of environmental effects in the SEA and preparing the Environmental Report. This was documented in **Appendix A** to the Environmental Report.

Consultation on the Environmental Report

- 3.3 When the Environmental Report was published in February 2011, the ODA sent out letters to the statutory bodies and other interested parties (stakeholders) to notify them of the report, where to access it, and to invite them to comment. In addition to the statutory environmental bodies that had been consulted on the Scoping Report, the consultation also targeted stakeholders who have an interest in, and who will be involved in implementing the Transport Plan¹¹. This included stakeholders from the transport industry, access and inclusion groups, environmental and sustainability organisations, competition venues, the business sector, educational and health groups, the London 2012 Nations and Regions Group, Government agencies and relevant politicians. The comments received on these two reports and the response made to this were reported in the ODA's Consultation Report on the Plan, and were taken into account in the drafting of the Second Edition of the Transport Plan, as described in 'The SEA process', page 5. The responses to comments received specifically on the Environmental Report are reproduced in **Appendix A** to this Post-Adoption Statement.

¹¹ This approach was compliant with the requirements of Regulation 13(2) of the SEA Regulations which state a copy of both the scoping and draft environmental reports be sent to each consultation body, and the relevant steps considered appropriate by the ODA be taken to bring the preparation of the Transport Plan and the Environment Report to the attention of the persons who, in the ODA's opinion, are affected or likely to be affected by, or have an interest in the decisions involved in the assessment and adoption of the Transport Plan.

Modifications to the SEA arising from the consultation

Scoping stage

3.4 The following key changes were made to the way in which the SEA was executed as a consequence of the consultations carried out at the scoping stage:

- PPS1: Delivering Sustainable Development, Defra Rural Strategy (2004) and the Landscape Character Assessment Guidance for England and Scotland were also included in the policy review undertaken for the SEA on the advice of Natural England.
- Heritage Coasts are included as an example of other areas of designated for landscape or townscape protection on the advice of Natural England.
- The SEA biodiversity objective was amended on the advice of Natural England;
- Additional baseline data for the Olympic Park, Greenwich Park, Lee Valley White Water Centre, Eton Dorney, Hadleigh Farm and Weymouth and Portland were included following feedback from Natural England.
- The Environmental Report took into account English Heritage's guidance document Strategic Environmental Assessment, Sustainability Appraisal and the Historic Environment, 2010.
- PPS5 and its accompanying Historic Environment Planning Practice Guide (2010) and the Government's Statement on the Historic Environment (2010) were also included in the policy review undertaken for the SEA on the advice of English Heritage.
- The SEA Landscape and Townscape and Heritage objectives and indicators were amended to take into account English Heritage's alterations, ensuring that both designated heritage assets and the wider historic environment are addressed, and that the SEA can identify opportunities for enhancement to the historic environment, including environmental character and sense of place.

After publication of the Environmental Report

3.5 The comments that were received on the Environmental Report have been taken into account by the ODA in the production of the Second Edition of the Transport Plan in the following way:

- Air quality - the ODA and TfL have worked together to assess the potential air quality effects of the highway measures. The ODA, TfL and TfL's air quality contractors have undertaken detailed air-quality modelling along - the ORN, PRN and in adjacent areas, which is entirely consistent with work already undertaken, in order to assess the effects that these measures might have. The findings of the assessment are presented in 'The emissions and air quality impacts of the 2012 Olympic Route Network and related traffic management arrangements', a report published in March 2012. The modelling indicated that there is expected to be a small net reduction in PM10 and NOx emissions within London and concentrations are projected to see a slight and temporary increase in a handful of areas. The ODA and

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TfL have agreed proposed mitigation measures, which include retrofitting buses with specialist equipment to reduce NOx emissions and the application of dust suppressants along key corridors such as the A12 and A13.

4 Alternative options

Alternatives considered

- 4.1 Following discussions on the potential alternatives, the different options that were considered by the ODA in adopting the Transport Plan were restricted to:
- the 'baseline' scenario of environmental conditions in 2012 that would prevail if the Transport Plan were not put into operation; and
 - the 'preferred strategy' set out in the Transport Plan.
- 4.2 The 'preferred strategy' of the Transport Plan focuses on the best use of existing infrastructure. This means that the Transport Plan will include the minimum additional provision necessary to meet the operational requirements of delivering the Games. The Environment Report stated that the measures set out in the Transport Plan essentially equate to a 'best practical environmental option' (including the measures included in the Plan indicated in 'The SEA process,' page 8), and therefore considered that there is little merit in suggesting alternative ways of providing for travel other than those specified in the 'preferred strategy'.
- 4.3 No comments disagreeing with this assertion were made by any of the statutory or other consultees who were asked to comment on the Environment Report.

Preferred option

- 4.4 The Environmental Report concluded that that the Transport Plan performed better in terms of meeting the SEA objectives compared with the baseline 'without the plan' alternative.

5 Monitoring strategy

Approach

- 5.1 During the development of a monitoring strategy, the DfT guidance suggests that the following questions are addressed:

What needs to be monitored?

- 5.2 Monitoring should focus on any significant environmental impacts that give rise to irreversible impacts upon environmental attributes in the area. However, as the SEA found no evidence of significant environmental impacts as a result of measures within the Transport Plan, monitoring needs to focus on potential significant impacts where there was uncertainty as to the environmental effects of the plan.

What sort of information is required?

- 5.3 The guidance states monitoring must focus on the environmental objectives, targets and indicators of the plan. Targets set in the ODA Sustainability Plan will also be taken into account. Wherever possible, direct environmental effects (or 'outcomes') should be measured, although it may sometimes be necessary to collect information on indirect factors (such as the progress of implementing a traffic reduction measure, or pressure factors/input, for example, emission levels).

What existing sources of monitoring information are there?

- 5.4 This requires checking what existing sources of monitoring information are available (from monitoring already carried out by local authorities in the vicinity of the Games venues in relation to other plans). This should avoid the replication of data gathering and unnecessary cost. The monitoring plan for the Transport Plan has been informed by previous stages of the SEA and contains relevant targets and indicators that will be used for the monitoring strategy.

How are any gaps in existing information to be identified and filled?

- 5.5 This was previously examined following consultation on the Scoping Report, at an earlier stage in the SEA process (see Stage B in **Figure 1** page 5). As and when further gaps appear in future reviews, new data will be sought. However, it should be noted that no primary data collection is necessarily appropriate for this level of monitoring, and is not required for compliance with the SEA Directive or Regulations.

How will it be determined when remedial action would be required and which actions could be taken?

- 5.6 Criteria or thresholds will be established as part of the strategy, which may trigger action if they are exceeded. Actions that may need to be taken could include:
- reviewing aspects of the plan that are failing and making amendments;
 - developing additional measures to avoid significant effects occurring in future;
 - mitigation;

- compensation;
- enhancement measures; and
- amendments to the plan implementation.

Strategy

- 5.7 The Sustainability Plan for the Games indicates that Venue Environment Management Plans are to be prepared, and will include matters such as resource use (energy, water, and materials), waste management, pollution monitoring (water and air quality) and impact on the natural environment. Monitoring of the likely significant environmental effects of the Transport Plan should be incorporated within these.
- 5.8 At the scoping stage of this SEA, objectives and indicators were selected and submitted for comment to the statutory environmental bodies. On the basis of the responses received, the ODA will use these indicators as the basis of monitoring the environmental effects of the Transport Plan. However, it is not necessary for the ODA to monitor these indicators directly. Indeed, the Government guidance on SEA suggests that wherever possible, authorities should use existing monitoring arrangements to obtain the required information.
- 5.9 Local Transport Plans (or Local Implementation Plans in London) were published in 2005 by the relevant local authorities in all the areas where the London 2012 Games venues are located. All of these plans have been subject to SEA. The Environmental Reports from these studies will themselves have identified monitoring programmes to ascertain whether transport was having significant environmental effects in those areas, and would highlight the need for further mitigating actions.
- 5.10 For example, **Table 3** on the following page sets out the key elements of the monitoring activity that was recommended by the SEA of the Local Implementation Plan (LIP) for Hackney¹² (one of the local authorities within which the Olympic Park is situated). However, it was also noted that this SEA found very little evidence of significant environmental impacts as a result of measures within Hackney's LIP. Only some of the bus priority measures and parking schemes were found to have a possible adverse impact on local air quality and noise. Mitigation measures were presented to minimise these impacts, so no change to the plan was advised in the Environmental Report. Therefore, given the lack of significant impact on the environment that the plan entails, no specific monitoring for the SEA is necessarily required.
- 5.11 As may be seen, with the exception of flooding and water quality indicators, all the indicators that were identified as relevant to the SEA for the Transport Plan at the scoping stage had already been identified for monitoring by the London Borough of Hackney in this case.
- 5.12 The relevant information on flooding and water quality is routinely monitored by the Environment Agency, and is available on the Agency's website¹³. The SEAs for the

¹² London Borough of Hackney (2010) - **Hackney Council Local Implementation Plan: Strategic Environmental Assessment (SEA) Environmental Report** - December 2010

¹³ www.environment-agency.gov.uk

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LIPs in London and the Local Transport Plans in other areas where the London 2012 Games venues are located all identified similar monitoring programmes.

Table 3 Selected Monitoring Indicators associated with the Hackney Local Implementation Plan

SEA topic area	Performance indicator	Data availability
Climate change	Level of CO ₂ emissions within the borough related to transport	Yes – from GLA Energy Inventory
Local air quality	Emissions from roadside air quality monitoring	Yes
	Levels of air pollutants (NO ₂ and PM ₁₀)	Yes
	Number of days when air pollution is moderate or high	Yes
Noise	Noise levels	To be identified by LIP Noise Map Programme
Biodiversity, flora and fauna	Coverage of designated/protected species	Yes
	Population of species and areas of priority habitat	To be audited through Hackney Biodiversity Action Plan
Heritage	Number of conservation areas	Yes
	Number of listed buildings	Yes
	Number of archaeological sites	Yes

- 5.13 Therefore, the ODA will utilise information from monitoring of other plans put in place by the relevant London borough, county and district councils to monitor the effects of the Transport Plan for the period it is in operation. This should be done by ongoing and regular liaison with those authorities. The present monitoring arrangements, are only due to run for the life of the present LIPs/LTPs (ie, until 2011) after which the boroughs will put into place monitoring arrangements for the subsequent round of transport plans. The ODA will keep these arrangements under review and will consider supplementing them if necessary.

APPENDIX

A

RESPONSES TO COMMENTS RECEIVED ON THE ENVIRONMENTAL REPORT

APPENDIX TABLE A.1 Responses to consultation comments on the environmental report

Document reference	Comment	ODA response
Comments from Transport for London (TfL)		
General	<p>TfL notes the SEA to date is based on an old version of the Transport Plan, 2nd edition, December 2009 (page 5). TfL has been working with the ODA on an updated Transport Plan to be issued in May 2011. The new version will need to take into account the outcomes of the SEA Environmental Report and the consultations relating to it. ODA should advise whether another SEA Environmental Report will be produced.</p>	<p>The assessment of the draft version of the plan is a requirement of the SEA Regulations and standard practice. The outcomes of the assessment were taken into account in the revision of the Transport Plan issued in June 2011, and the ways in which this has been done are set out in this post-adoption statement as required by the SEA Regulations.</p> <p>Another SEA Environmental Report will only be produced if there is a further revision of the Transport Plan that may be considered to be more than a 'minor modification' of the plan, in line with Regulation 5(6) of the SEA Regulations.</p>
	<p>Overall, TfL notes the general findings of the SEA that the Transport Plan is unlikely to have any significant adverse environmental effects. However, TfL would like clarity on the significant adverse noise impacts identified at specific locations. In addition, the SEA does not identify specific mitigation proposals for potential local air quality and noise problems. As detailed design of the Olympic Route Network (ORN) and Paralympic Route Network (PRN), and therefore impacts, had not been finalised at the time of handover to TfL, TfL will work with the ODA to ensure any of the ODA's statutory obligations are discharged in an appropriate and cost effective manner. Any further environmental evaluation work and mitigating measures are expected to be funded by ODA.</p>	<p>Noted.</p>

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Document reference	Comment	ODA response
Non-Technical Summary	It is assumed a Non-Technical Summary (NTS) has been or will be produced. The Executive summary is very brief and if intended to be the NTS would be expected to have more information summarising each part of the Environmental Report.	The Executive Summary constitutes the non-technical summary as required by Schedule 2 to the SEA Regulations.
Review of other plans and programmes	<p>Additional policy documents that should be reviewed and listed in Appendix B are:</p> <ul style="list-style-type: none"> • Mayor's Transport Strategy, May 2010. Appendix B lists the draft 2009 strategy. • Mayor's Air Quality Strategy (MAQS), Dec 2010. Appendix B lists the draft March 2010 strategy. • Mayor's Biodiversity Strategy, July 2002. <p>A minor point, but the word mitigation is missing from the title of the Mayor's Draft Climate Change and Mitigation Strategy, February 2010.</p>	<p>The draft MTS was the relevant document at the time the Environmental Report was published. The finalised MTS has been reviewed subsequently.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>

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Document reference	Comment	ODA response
Environmental baseline	<p>Neither the environmental baseline, nor the assessment of the likely significant effects, includes the SEA topics of 'human health', 'population' and 'material assets'. A reference explaining their exclusion/scoping out should be included.</p> <p>The SEA Regulations require the report to describe "the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan". The likely evolution without the plan for the various topics could be made more transparent.</p>	<p>The scope of the SEA was set out in the Scoping Report prepared on behalf of the ODA in May 2010, and the statutory environmental bodies were consulted on the report as required by the SEA Regulations between 11 May and 15 June 2010 (subsequently extended to 16 July 2010). No adverse comment in this respect was received from them.</p> <p>As the measures set out in the Transport Plan focus purely on enabling spectators and the Olympic and Paralympic Family to travel easily and efficiently to and from Games venues during the period between 13 July and 14 September 2012, there were considered to be no likely effects on population, and this was scoped out of the assessment.</p> <p>Human health effects are considered in the SEA on the basis that the criteria used to assess the significance of effects on air quality, noise, soil and water are typically based on protecting human health.</p> <p>The consideration of effects on material assets was specifically scoped out in the Scoping Report on similar grounds to the omission of population and noting that only limited, temporary new infrastructure is planned.</p> <p>Similarly, it was considered that the use of the most current existing baseline environmental information was adequate for the purposes of the SEA, given the limited duration of the Games-time period, and the timescales for the implementation of the Transport Plan.</p> <p>It should be noted that a separate Health Impact Assessment of the Transport Plan was subsequently commissioned by the ODA¹⁴</p>

¹⁴ McCarthy, M. *et al* (2010) - Health Impact Assessment of the London 2012 London Olympic Transport Plans - European Journal of Public Health, Vol.20, No.6, pp.619-624.

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Document reference	Comment	ODA response
Assessment of environmental effects	There does not appear to be consideration of inter-relationships between effects nor identification of likely secondary, cumulative and synergistic effects as required by SEA Regulations.	The approach adopted in the SEA in considering effects on a venue-by-venue basis as well under each topic heading helped to ensure that inter-relationships and these other aspects of the likely identified effects were taken into account. The CORNETTO modelling of traffic impacts on which the assessment of environmental effects has been based was also done on an aggregate basis, so the cumulative and synergistic effects of traffic have been considered in this way.
SEA objectives and indicators, page 25	<p>The biodiversity indicator (4th row) would be improved by making clear which designated sites and species will be measured and how the effect of the Transport Plan on such sites and species would be assessed. In Appendix A Natural England suggests an additional biodiversity indicator (comment 15):</p> <p><i>'Area of BAP habitat enhanced through the Transport Plan proposals'</i></p> <p>This indicator (or similar) would be valuable for measuring progress against the objective, not only for avoiding damage, but also for enhancing biodiversity.</p>	<p>The indicators recommended were chosen on the basis of what existing arrangements for monitoring is in place, in line with Government guidance on monitoring for SEA. Also, given the limited duration of the Transport Plan's operation, (10 weeks) it seems unlikely that any measurable enhancement would result from measures set out in the Transport Plan.</p> <p>It should be noted that the ODA has commissioned ecological surveys where required where temporary parking areas are being provided at venues.</p>

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Document reference	Comment	ODA response
Baseline air quality, page 29	<p>The Environment Report should recognise the limitations associated with Air Quality Management Areas (AQMA) and monitoring data. Many London boroughs declared their AQMAs as entire boroughs as it was appropriate for the process of taking action to improve their air quality. Therefore AQMAs do not necessarily help identify the locations at highest risk of not meeting air quality objectives. Air- quality monitors are often located close to busy road junctions or industrial sites in order to investigate these specific sources. Therefore the air-quality monitoring data alone may not be representative of the air quality the general population will be exposed to in that area. TfL carries out London wide air quality modelling that can be used for future assessments of baseline air quality. This is available at data.london.gov.uk/laei-2008-concentrationmaps.</p> <p>For clarity the report could explain the relationship between the EU limit values and the MAQS objectives. The MAQS sets this out.</p>	Noted. Further work has been undertaken on air quality issues taking account of this information and is reported in the Post-Adoption Statement.
Air Quality in the Olympic Park area, page 34	<p>TfL notes that the Environment Report uses modelling undertaken by the London Development Agency and London boroughs for planning applications in 2004. These do not take account of a significant air quality improvement measure – the London Low Emission Zone (LEZ), which was introduced in 2008. TfL's London wide air-quality modelling incorporates the current phases of the LEZ (available at data.london.gov.uk/laei-2008-concentration-maps).</p>	Noted.
Figure 9, page 51	<p>London Squares, World Heritage Sites, Registered Parks and Gardens could also be shown on the heritage constraints map. If they have been omitted for a reason this should be referenced.</p>	Noted.

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Document reference	Comment	ODA response
Noise, page 85, 97, 98	<p>The Summary Assessment Table on page 85 states the Transport Plan as having a 'Neutral effect generally on noise but significant temporary adverse effects in some specific locations'. The term 'significant' is important in the context of environmental appraisal which may lead to the requirement for EIA and subsequent planning consent. TfL would welcome clarity on the locations where significant temporary adverse effects on noise may occur. In addition, because the assessment methodology on page 81 is brief it would be helpful if there was an explanation on how the noise impacts in some locations have been determined as significant. This is important as page 94 describes the detailed planning of the ORN and PRN (now by TfL) requiring care to ensure its implementation does not lead to unacceptable increases in traffic noise levels at certain locations.</p> <p>The comments on pages 97 and 98 state there are no significant noise impacts in contrast with the comments on page 85 (significant noise impacts at some locations). Clarity on this issue would be welcome.</p>	<p>The assessment of noise impacts due to changes in traffic flows resulting from implementation of the ORN and PRN has been informed by the modelling of these changes available from ODA at the time the assessment was undertaken. However, this work was ongoing, and indeed has been updated since the SEA works were carried out. Consequently, it was considered inappropriate to be specific about the locations where such impacts may occur as these would be subject to change.</p> <p>As indicated in the Summary Assessment Table, the significance of changes in noise level is defined in the SEA as where a $\pm 3 \text{ dB(A)}_{L10,18\text{-hour}}$ change is expected to occur. Account is also taken of the temporary nature and short duration of the predicted effects in assessing significance.</p> <p>However, as greatest changes in noise levels will only occur at peak times where the ORN or PRN is in operation it is unlikely that exposure to such changes will occur for other than very limited periods. Therefore, overall it is considered that this does not constitute a significant impact overall that would require mitigation.</p>
Noise, page 94	<p>There is one reference to enhanced service levels of public transport and any potential environmental impacts (when discussing noise impacts from National Rail). However enhanced service levels are discussed in the Transport Plan for Underground and bus at several venues. Reference should be made to these even if the environmental impacts were assessed as insignificant.</p>	<p>Noted. This is implicit in the assessment of noise from highway traffic, where the changes in traffic flow are assumed to include changes to public transport services also.</p>

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Document reference	Comment	ODA response
Summary assessment table, page 86	The landscape and townscape of Greenwich World Heritage Site would be impacted upon by the installation of any form of temporary bridge over Romney Road; additionally, the installation of security fencing and temporary signals will have a negative impact on the Maritime Greenwich landscape.	This is noted in terms of the minor temporary adverse effect identified in the Summary Assessment Table. The detail of these issues will be addressed mainly by the Venue Transport Operations Plans (VTOPs) and not the Transport Plan, so consequently fall outside the scope of the SEA.
Climate Change, page 91	Whilst the greenhouse gas impact of the Games can be reduced by encouraging maximum use of public transport, the carbon efficiency of those buses and trains is important. It is worth stating that train service planning has been developed in order to provide for the forecast spectator demand with the necessary capacity whilst avoiding unnecessary train mileage.	Noted.

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Document reference	Comment	ODA response
Local Air Quality, page 91-92	<p>TfL notes the SEA reports that the operation of the ORN and PRN would lead to an increase in levels of NO_x and PM₁₀ emissions by 6% and 12% respectively. However, the effects of the travel demand management package in operation during the Games, makes it likely that overall levels of NO_x and PM₁₀ emissions would reduce by 28% and 26% respectively. TfL would welcome reference to how these emissions impacts were calculated. Despite overall reduced emission levels, TfL notes the Report states local changes in emission levels due to ORN and PRN operation are potentially of concern. This is because these may cause Air Quality Standards to be breached on more days than otherwise would be the case. ODA modelling Indicates there are locations where quite large increases of traffic flow may occur as a result of diversions necessary for ORN and PRN operation; albeit perhaps for a small number of occasions. This includes a number of locations: in the vicinity of the Olympic Park; on the main through-routes in the City of London; and on the routes serving Wimbledon, Earls Court and Wembley. The Report states that ‘the detailed planning of the ORN and PRN must ensure that the arrangements for its implementation and the diversion of non-Games Family traffic do not lead to additional breaches of air quality standards.’</p>	<p>These were calculated as outputs from the CORNETO modelling work provided by the ODA.</p> <p>More work has been commissioned subsequently by the ODA in collaboration with TfL to examine these issues, and is reported in the Post-Adoption Statement.</p>

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Document reference	Comment	ODA response
Local Air Quality, pages 91–92 (cont)	<p>The possibility of additional breaches of air quality standards is of concern to TfL and the GLA not least because of the possibility of EU fines. The Report states that as a consequence of potential breaches of air quality standards the ORN and PRN will be subject to TfL's Project Environmental Appraisal. TfL will work with the ODA to establish whether further environmental evaluation is required on completion of the SEA and the ODA's air quality studies. As stated previously, the ODA has recently transferred to TfL responsibility for the delivery of the ORN and PRN in London. As detailed design of the routes, and therefore impacts, had not been finalised at the time of handover, TfL will work with ODA to ensure the ODA's statutory obligations are discharged in an appropriate and cost-effective manner. Any further environmental evaluation and mitigating measures at priority locations by TfL as the local delivery partner are expected to be funded by ODA. As diversionary roads may well be borough roads the ODA is advised to also liaise with local authorities on this issue. This is aligned with measures in the MAQS.</p> <p>Although material assets were excluded from assessment TfL would like to highlight these sustainable resource use measures:</p> <ul style="list-style-type: none"> - TfL's plans for comprehensive information provision to the travelling public leading up to and during the Games to ensure the efficient use of existing transport infrastructure. - TfL's plan to use digital marketing channels (for example, website, email) as the primary medium for Games information provision to customers, negating the need for significant volumes of printed material. - TfL's commitment to print marketing and information material on recycled paper where practical. 	<p>Noted. More work has been commissioned subsequently by ODA in collaboration with TfL to examine these issues, and is reported in the Post-Adoption Statement.</p>

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Document reference	Comment	ODA response
Response to consultation question 1	<p><i>Do you agree with the general findings of the SEA that the Transport Plan will have a positive impact on the environment and that significant effects will be effectively managed by the mitigation proposals?</i></p> <p>TfL notes the general findings of the SEA that the Transport Plan is unlikely to have any significant adverse environmental effects. TfL would like clarity on the significant adverse noise impacts at specific locations. In addition, the SEA does not identify specific mitigation proposals for potential local air quality and noise problems. As detailed design of the ORN and PRN, and therefore impacts, had not been finalised at the time of handover to TfL, TfL will work with the ODA to ensure the ODA's statutory obligations are discharged in an appropriate and cost-effective manner. Any further environmental evaluation work and mitigating measures are expected to be funded by ODA.</p>	Noted.
Response to consultation question 2	<p><i>Are there any additional mitigation techniques for addressing the environmental impact of the Transport Plan which have been overlooked?</i></p> <p>The SEA has highlighted there are potentially locations where local air quality is degraded. It is expected that the ODA will work with and enable delivery authorities to respond to any increases in local air pollution and that they have clear planned actions in place to ensure measures are delivered during the Games.</p>	Noted.
Response to consultation question 3	<p><i>In terms of environmental impact, are there any alternative Transport Plan policies and plans which should have been considered?</i></p> <p>No response.</p>	Noted.

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Document reference	Comment	ODA response
<i>Comments from Natural England</i>		
<p>Air Quality Pages 29–30 – Olympic Park – Air Quality Page 33 – Table 4 – UK national air quality standards Page 37 – Table 6 – Zones where annual mean limit value for NO₂ will be exceeded</p>	<p>These are all focused solely on the air quality standards (particularly for NO₂ & NO_x) which have been set for the protection of human health. However, standards for the protection of vegetation and ecosystems are lower than those for human health (annual mean of 30µgm⁻³; as opposed to 40µgm⁻³). The Olympic Park and several of its access routes are close to the southern end of the Epping Forest SSSI and SAC, which is already assessed as being in an unfavourable condition at least in part due to the effects of poor air quality and the associated nitrogen deposition. Natural England accepts that the extra traffic generated by the London 2012 Games will only be for a short duration, the SEA ought, as a demonstration of best practice, acknowledge this issue. This could be achieved by including a reference to the Epping Forest SSSI and SAC and the concerns relating to air quality within the 'Biodiversity, flora and fauna' section on pages 39–42.</p>	Noted.
<p><u>Lee Valley White Water Centre</u> (page 66)</p>	<p>Natural England suggests replacing the sentence: <i>'To the north and north-west of the venue is an SSSI and a Ramsar site.'</i></p>	Noted.
<p><i>Biodiversity, flora and fauna</i></p>	<p>With the more accurate; <i>'To the north and north-west is the Turnford and Cheshunt Pits SSSI, which is also a component site of the Lee Valley SPA and Ramsar site. Slightly further away to the northeast is the Waltham Abbey SSSI.'</i> We would also see the following additional sentence at the end stating that: <i>'The site falls within the area covered by both the Hertfordshire Biodiversity Action Plan and the Lee Valley Biodiversity Action Plan.'</i></p>	

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Document reference	Comment	ODA response
<p><u>Hadleigh Farm</u> (page 72)</p> <p>Biodiversity, flora and fauna</p>	<p>The current text reads,</p> <p><i>The Essex Biodiversity Action Plan currently contains action plans for 25 species and 10 habitats which are confined to, or are characteristic of, Essex. There are approximately 455ha of parks and open spaces within Castle Point District. Hadleigh Farm lies within the Thames Estuary Special Area of Conservation. Adjacent to the venue lies the Hadleigh Castle Landslip, which is a Regionally Important Geological/Geomorphological Site (RIGS).</i></p> <p><i>There are five SSSIs within Castle Point District, the largest of which lies within the Hadleigh Downs. This area has also been designated as a Wetlands of International Importance and is a Special Protection Area. Benfleet and Southend Marshes is also a RAMSAR site, as well as an SPA. This is shown in Figure 14.</i></p> <p>Natural England proposes the following rewrite:</p> <p><i>The Hadleigh Farm site is immediately adjacent to the Benfleet and Southend Marshes SSSI, SPA and Ramsar site to the south and west; with a short section of the course lying within the SSSI. Adjacent to the south-east is the Hadleigh Castle Landslip, which is a Regionally Important Geological/Geomorphological Site (RIGS). This is shown in Figure 14.</i></p> <p><i>Benfleet and Southend Marshes is one of five SSSIs in Castle Point District, which contains approximately 455ha of parks and open spaces. The Essex Biodiversity Action Plan currently contains action plans for 25 species and 10 habitats which are confined to, or are characteristic of, Essex.</i></p>	<p>Noted.</p>

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Document reference	Comment	ODA response
<p><u>Hadleigh Farm</u> (page 72) <i>Landscape and townscape</i></p>	<p>Natural England's comments on the scoping report referred to the role of Hadleigh Castle in landscape heritage recorded in the paintings of John Constable and William Turner. It does seem odd that this aspect of landscape appreciation has not received any reference in the SEA.</p>	<p>Noted.</p>
<p><u>Eton Dorney</u></p>	<p>Natural England would like to point out that the description of biodiversity is focused on the immediate vicinity of the rowing lake and does not take into account the wider landscape within which the venue sits. This landscape, through which spectators will walk and cycle to the venue, is the landscape of the Thames flood plain which has unique habitats and a history of flood meadow management to support the species that can be found there. Can references to these species be included?</p>	<p>Noted.</p>
	<p>The route for the Road Cycling Race was not in the public domain when this SEA was drafted and the only reference to the race is on page 17, <i>'There will also be road-based events in central London and the Olympic Park areas</i>. The route is not solely London-based and there are five nationally important Sites of Special Scientific Interest along the route: Richmond Park, Bushy Park, Esher Common, Mole Gap to Reigate Escarpment (that includes Box Hill and Headley Heath), and Combe Bottom. Natural England is working with LOCOG and the landowners to ensure these sites can be enjoyed during the Games without harming habitats and species. Natural England would like to know whether there will be any supplement to the SEA to assess potential impacts to the species and habitats covered by the designations as the Transport Plan is developed with Surrey County Council.</p>	<p>Noted. An update of the SEA will be required if there are further changes to the Transport Plan that may be considered to be more than a 'minor modification' of the plan, in line with Regulation 5(6) of the SEA Regulations.</p> <p>A sustainability appraisal has been undertaken for the routes of the road-based events which has determined mitigation measures.</p>

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Document reference	Comment	ODA response
Other	<p><u>Metropolitan Police MBDCs</u></p> <p>Natural England is concerned that there is no reference to the Metropolitan Police’s ‘Muster, Brief & Deployment Centres’ (MBDCs) and the environmental impacts that these may have. Three of these are to be set up as temporary operating bases for both the Metropolitan Police and for police bussed in from other forces across the country. As these are likely to generate a fairly significant amount of traffic, it would seem appropriate for them to be covered in the SEA.</p>	<p>The Metropolitan Police operations are not part of the Transport Plan, and therefore do not fall within the scope of the SEA.</p>
<i>Comments from London Borough of Camden</i>		
Question 1	<p>Do you agree with the general findings of the SEA that the Transport Plan will have a positive impact on the environment and that significant effects will be effectively managed by the mitigation proposals?</p> <p>Yes. Although we recognise that there will be specific negative impacts on the existing environment due to Games related travel (for example, a reduction in air quality at certain locations), we agree that the measures outlined in the SEA will have an overall positive effect in minimising and reducing these impacts across the wider environment.</p> <p>While we understand that the proposals in the SEA will contribute to the management of more significant impacts, we suggest additional measures that may further reduce negative impacts of London 2012 travel on the environment (See Question 2 for details).</p>	<p>Noted.</p>

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Document reference	Comment	ODA response
Question 2	<p>Are there any additional mitigation techniques for addressing the environmental impact of the Transport Plan which have been overlooked?</p> <p>Yes. We recommend the following additional mitigation measures be incorporated in to the Strategic Environment Assessment:</p> <ul style="list-style-type: none"> - The use of electric, hybrid (including retrofit hybrid assist technology) or biomethane gas vehicles should be deployed through (what does 'through' mean) the London 2012 Games, and all vehicles should meet the Euro 4 emission standard. Zero emission buses should be used wherever possible for park-and-ride schemes. - A 'no idling vehicles' policy should be adopted at all drop-off and collection areas, especially for coaches and buses. - The Olympic Park at Stratford should be given the status of low emission zone with only electric, hybrid & biomethane vehicles permitted to be operated within the Olympic and Paralympic Village. - Camden keenly advocates the use of low emission vehicles where public transport is not feasible. 	<p>Noted. Operational contracts may require this in line with the Games Low-Emission Venues Emissions Standards set out in the Sustainable Sourcing Code for the Games¹⁵.</p> <p>This could be considered as a mitigation measure, and is likely to be included in operational contracts.</p> <p>London is already covered by a LEZ, albeit one that is not as restrictive as suggested here.</p> <p>This is covered by the Low-Emission Venues Emissions Standards.</p>

¹⁵ London Organising Committee of the Olympic Games and Paralympic Games (2011) - **LOCOG Sustainable Sourcing Code** - Third edition, July 2011, Appendix B.

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Document reference	Comment	ODA response
Question 3	<p>Is any significant environmental data missing or misrepresented?</p> <p>Yes.</p> <p>The details of the baseline scenario are not clear, especially with regards to traffic flows on key London 2012 routes in Camden. It is also unclear what the baseline year is, and if this is consistent or comparable across data sources.</p> <p>Further information is required on the impacts of increased PM₁₀ and NO_x emissions on daily mean PM₁₀ and hourly NO₂ concentrations in Camden. In particular, Euston Road, and Bloomsbury are of interest to Camden.</p> <p>It would be useful to include a map showing specific receptor locations and predictive NO₂ and PM₁₀ concentrations for the baseline and London 2012 scenarios, as this would help to identify the locations that will experience the worst impacts in relation to increased traffic emissions in Camden.</p> <p>Further information on the model used to carry out the air quality assessment, as well as the input data, for example; which traffic data from which roads were used, what vehicle emission factors and MET data. What assumptions were made in terms of ADDT24, fleet mix and emission factors for London 2012 traffic?</p> <p>What percentage increase in annual mean PM₁₀ and NO₂ concentrations would be expected from the Games? This data would be more informative than emission increases in terms of determining the impacts on local air quality.</p> <p>The report mentions 'minor temporary adverse effects in some specific locations' – can more information on the extent and location of these be included in the SEA?</p>	<p>Noted. The baseline data is not necessarily consistent or comparable as this comes from a variety of existing sources.</p> <p>More detailed information may be available from ongoing work being undertaken by or for ODA and TfL.</p>

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Document reference	Comment	ODA response
Question 4	<p>In terms of environmental impact, are there any alternative Transport Plan policies and plans which should have been considered?</p> <p>No.</p> <p>The Council agrees that a high level of protection of the local environment is a critical to a successful London 2012 Olympic Games. We are dedicated to working with the ODA and other partners in the preparation and adoption of plans and programmes to minimise impacts on the environment during the Games and promote a sustainable transport legacy for London for the future.</p>	Noted.

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Document reference	Comment	ODA response
<i>Comment from Clean Air in London</i>		
General	<p>CAL notes the ODA's promise in its letter to CAL dated 22 March 2011 that included:</p> <p><i>'The ODA undertook the preliminary design for the Olympic Route Network (ORN) and for the Traffic Regulation Order (TRO) process, however in accordance with our strategy the detailed design and operation have been handed over to Transport for London (TfL). Funding has also been handed over to complete works associated with the build and operational phases.</i></p> <p><i>'As detailed design of the routes, and therefore impacts, had not been finalised at the point of handover, the ODA will work collaboratively with TfL to ensure any statutory obligations are discharged in an appropriate and cost effective manner.'</i> (CAL emphasis added).</p> <p>These statements give CAL a 'substantive legitimate expectation' that offsetting measures will be introduced by the ODA and/or TfL to ensure that there is no worsening of air quality as a result of the ORN and/or PRN. As yet, these are: vague or unspecified; and still unquantified.</p>	<p>Noted. The ODA and TfL have undertaken further work in collaboration to examine these issues and are reported in the Post-Adoption Statement.</p>

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Document reference	Comment	ODA response
Adequacy of the consultation	<p>The information provided is inadequate.</p> <p>CAL believes that the information which has been provided to the public in this consultation document is inadequate. For example, it:</p> <ul style="list-style-type: none"> - Looks narrowly at the impact of the ORN and PRN near the London 2012 venues and along some major thoroughfares, for example: <i>'However, because of the geographical extent of the ORN and PRN and the limited width of the corridor beyond the network itself that is likely to be affected, it is not practical to describe baseline environmental conditions relating to the whole ORN and PRN'</i> (page 27). 	<p>The nature of air quality impacts is that these would be very unlikely to occur other than in the immediate vicinity of the ORN or PRN. It may be noted that the GLAs mapping of air pollutant concentrations clearly indicates this.</p>

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Document reference	Comment	ODA response
<p>Adequacy of the consultation (cont.)</p>	<ul style="list-style-type: none"> <li data-bbox="472 320 1249 1029">- It does not take account of the Mayor's final Air Quality Strategy (MAQS) which was published on 14 December 2010, ie, more than two months prior to the launch of this consultation. Given the scale of breaches of NO₂ limit values in London, the MAQS – if successful – may result in some areas near or along the ORN or PRN, that breached the NO₂ limit values in 2010, complying with them in 2011. This would increase the prospect of the ORN and PRN causing aggravated breaches of one or both NO₂ limit values (ie, a limit value being exceeded having been attained) in 2012. Further, the Transport Plan refers to measures in the Mayor's draft Air Quality Strategy which were subsequently weakened or removed which might have addressed problems during the Games, for example special measures to reduce the number and length of periods of high pollution; and CAL submitted requests for information to the ODA and TfL under the Freedom of Information/Environmental Information Regulations on 22 February 2011. It received replies from the ODA and TfL dated 22 March and 6 April respectively. As is clear from the fact that CAL had to make the request(s), the information was not provided in the consultation document itself. In the circumstances, CAL's ability to respond to the OTP consultation is compromised. <li data-bbox="472 1034 1249 1276">- It assesses compliance with the Air Quality Standards (AQS) when it should be assessing compliance with the EU directive on ambient air quality and cleaner air for Europe 2008/50/EC and the Air Quality Standards Regulations 2010 (AQSR 2010). Inadequate information is provided on where or when the breaches of EU limit values are likely to occur and there is none to quantify the effect of measures needed to ensure the full mitigation of adverse impacts. 	<p data-bbox="1256 320 2029 462">The baseline analysis presented in the Environmental Report, while not specifically referencing the MAQS, is consistent with its findings in terms of forecast future air quality in London. The MAQS has been reviewed subsequently to confirm this.</p> <p data-bbox="1256 467 2029 638">Further work on mitigation measures to ensure that no significant breaches of air quality standards occur during the period that the Transport Plan is operational has been jointly undertaken by ODA and TfL and mitigation measures have been proposed. This is reported on in the Post-Adoption Statement.</p> <p data-bbox="1256 1037 2029 1244">While this may be true, for the purposes of assessing significance these standards amount to the same thing. The shortness of the period of operation of the Transport Plan during the Olympic Games and Paralympic Games means that no meaningful detailed assessment of breaches of EU limit values is appropriate as a measure of significance.</p>

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Document reference	Comment	ODA response
<p>The SEA identifies problems: OTP expected to cause the breach of one or more limit values</p>	<p>Even assuming the ambitious Transport Demand Management (TDM) plan in the Transport Plan is implemented successfully, the Transport Plan is expected to cause breaches of one or more limit values. For example:</p> <p><i>‘Regarding PM₁₀ monitoring data, it is forecasted that annual mean levels will be below the AQS. However, the number of daily mean exceedances at some roadside sites is anticipated to be more than the allowable number of exceedances’</i> (page 36). CAL emphasis.</p> <p>Further, Appendix C states in several places: <i>‘Both the NO₂ and PM₁₀ levels still likely to exceed the AQS in 2012’</i>, ie, at ‘The River Zone’, ‘Central Zone’, ‘Other London venues’ and ‘Other venues’. It is not clear from the consultation documents if these breaches are caused by the Transport Plan and/or just exacerbated by it. As you know, limit values may not be exceeded once attained and air pollution in general may not be worsened. No breaches of the PM₁₀ limit values are permitted in 2011 or thereafter. NO₂ limit values have been breached in London since they entered into force in January 2010 and may only be breached in the period up to January 2015 if the UK obtains a time extension to comply with them and meets various conditions such as the need to ensure NO₂ annual mean concentrations do not exceed 60 micrograms per cubic metre (µg/m³). The UK must lodge such an application by 30 September 2011 and the European Commission would then have until 30 June 2012 to object to it (or not). In other words the outcome is likely to be known only in the last few days or weeks before the start of the London 2012 Games. You will be aware the UK’s first application for a time extension on PM₁₀ was rejected in December 2009 and the European Commission announced on 11 March 2011 a time extension until 11 June 2011 subject to a temporary and conditional exemption (which has not yet been complied with).</p>	<p>These references are to the baseline environmental conditions, ie, those prevailing should the Transport Plan (and indeed the Olympic Games and Paralympic Games) not go ahead. These breaches, if they were to occur, are therefore not be due to the Transport Plan, and the inference here is incorrect.</p>

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Document reference	Comment	ODA response
<p>The SEA fails to identify and quantify solutions: full mitigation is needed</p>	<p>The consultation appears to dismiss the problems identified on the basis they would be either temporary in time or local in geographical terms, ie, <i>'minor temporary adverse effects in some specific locations'</i> (page 6), <i>'minor adverse effect'</i> (Table 15 on page 80) and/or <i>'Overall, a minor temporary adverse effect of the Transport Plan is anticipated in this respect, compared with baseline conditions'</i> (page 93). Worse, the consultation highlights the need for a solution or solutions and then fails to specify it or quantify it or them. For example, the consultation states on pages 92 and 93:</p> <p><i>"The modelling of the effects of the ORN and PRN indicates that there are a number of locations where quite large increases of traffic flow may occur as a result of diversions necessary for the operation of the ORN and PRN, albeit perhaps for a small number of occasions. This includes a number of locations:</i></p> <ul style="list-style-type: none"> <i>- in the vicinity of the Olympic Park;</i> <i>- on the main through-routes in the City of London; and</i> <i>- on the routes serving Wimbledon, Earls Court and Wembley.</i> <p><i>'As the detailed planning of the ORN and PRN continues, it will be necessary to ensure that the arrangements for its implementation and the diversion of non-Games Family traffic do not lead to additional breaches of air quality standards. The detailed design of the ORN and PRN has now been handed over to TfL as the delivery partner responsible. Consequently, the scheme will be subject further to TfL's Project Environmental Evaluation appraisal. 'Outside of London, the anticipated levels of traffic and the way in which the ORN and PRN will be operated mean that it is unlikely that the effects of the ORN and PRN will lead to any significant worsening of air quality.'</i></p>	<p>Noted. The analysis in the Environmental Report is based on the best available information at the time the report was compiled.</p> <p>The ODA, in association with TfL, has subsequently commissioned further work to examine the likely effects of the ORN and PRN on air quality in order to address these issues.</p>

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Document reference	Comment	ODA response
	<p><i>'However, even if this were the case, it seems unlikely that there would be significant additional emissions of local air pollutants from road traffic during the period in which the Transport Plan will be operational. Also, any effects that were to occur would only do so temporarily, over a relatively short period of time. On this basis, it is considered that there would be at worst some minor decrease in baseline air quality associated with emissions from transport due to travel associated with the Games. However, the measures that the Transport Plan will put in place to encourage and ensure that a very high proportion of travel by spectators will be by public transport means that the levels of local pollutant emissions will be lower than would otherwise have been the case without the Plan. Overall, a minor temporary adverse effect of the Transport Plan is anticipated in this respect, compared with baseline conditions.'</i> [CAL emphasis]. CAL proposes that the Mayor should adopt a Berlin-style low emission zone for inner London during the 100 days in 2012 covered by the Queen's Diamond Jubilee, the Olympic Games and the Paralympic Games. This would ban all pre-Euro 4 diesel vehicles with the exception of licenced black taxis dropping off fare paying passengers (but not picking them up) and vulnerable groups. The scheme would continue in Central London after these events. Based on TfL estimates (provided to CAL in response to a Freedom of Information request) this might affect up to 30 per cent of diesel cars; 55 per cent of LGVs and minibuses; 45 per cent of coaches; 40 per cent of rigid HGVs; and 30 per cent of articulated HGVs. Surely a planned measure like this would be better than a last minute, chaotic odd and even number plate affecting all vehicles? It would reduce vehicle numbers and air pollution. This scheme would showcase for 100 days in 2012 we would see in Central London from late 2012 and more significantly across the city in 2015 and thereafter. It would support the image of the 'greenest Games ever' and deliver tangible public health benefits</p>	<p>Noted.</p>

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Document reference	Comment	ODA response
	<p>Conclusion</p> <p>On the basis of the information provided, incomplete though it is, the Transport Plan and the operation of the ORN and PRN would lead to:</p> <ul style="list-style-type: none"> - breaches of the PM₁₀ daily limit value in 2012 (for example, page 36 and Appendix C); - likely aggravated breaches of the NO₂ annual mean and NO₂ hourly limit values (ie, exceedances of limit values which had been attained in 2011); and - an increase in harmful concentrations in ambient air. <p>For the reasons outlined above this would be unlawful and vulnerable to legal challenge through judicial review.</p> <p>CAL therefore concludes that the ODA, TfL and the Mayor of London should reject the proposal for the OTP. There should be no further outcome without further information and modelling, all of which should be subject to further consultation.</p>	<p>This conclusion may not be drawn from the Environmental Report, and is erroneous. The Report highlights potential risks that will be addressed during ongoing planning for the ORN and PRN to ensure such breaches do not occur. Further work on mitigation measures to ensure that no significant breaches of air quality standards occur during the period that the Transport Plan is operational is being developed jointly by ODA and TfL.</p>
<p><i>Comments from Royal Borough of Windsor and Maidenhead (RBWM)</i></p>		
<p>Spectator Transport, page 10</p>	<p>The third sentence should start ‘Strict parking and/or access controls...’</p>	<p>Noted.</p>
<p>Integrated Planning, page 12</p>	<p>The second paragraph makes reference to ‘...an accessible network based on public and community transport...to every venue’. RBWM is not aware of community transport featuring in the current plans for the Eton Dorney venue, but would welcome this addition. Similarly, clarification as to provision of bus routes to venues from within the local area would be appreciated.</p>	<p>Noted.</p>

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Document reference	Comment	ODA response
Eton Dorney, page 67	'Windsor and Maidenhead District' should read 'Royal Borough of Windsor and Maidenhead'.	Noted.
Biodiversity, flora and fauna, page 68	The last paragraph mentions the Thames Path National Trail. It should be noted that National Cycle Network Route 4 also passes through the area and around the northern perimeter of the site.	Noted.
Air Quality at Eton Dorney, 2004 Table 14, page 70	RBWM can provide ratified data for the Air Quality Management Areas for 2009. Also, there should be more clarification as to what is meant by the figures quoted in Table 14.	Noted.
Planning Principles, page 78	The second paragraph indicates that free travel is being provided for spectators within Greater London. It is worth noting that this free travel extends to other venues, including Eton Dorney, for spectators travelling from London (but not from other parts of the UK).	Noted.
Climate Change, page 87	The third paragraph indicates that for venues outside London almost all spectator travel will be via non-car modes. However, there will be extensive use made of park-and-ride, which means that spectators will be driving long distances to make use of these facilities and there may be congestion on routes to the park-and-ride sites. It is not clear whether the park-and-ride operations have been taken into account in the calculations.	<p>It is considered that the operation of the strategic park-and-ride sites at Redbourn, Lakeside and Bluewater would be unlikely to lead to significant changes in traffic flows to and from these locations compared with their normal operation, and therefore no significant environmental effects would be likely. No new infrastructure is required for these either, so no effects associated with this will occur.</p> <p>The version of the Transport Plan to which the SEA relates indicated that the locations of the park-and-ride sites for each venue were still being planned and were subject to further work on seeking agreements with landowners. Therefore it was not possible to include an analysis of the environmental effects of this at this time.</p>

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Document reference	Comment	ODA response
Air Quality, page 91	<p>Again, there is no mention of the likely effects of park-and-ride operations. RBWM has three air-quality management areas, all of which would lie on the routes used by park-and-ride or rail shuttle operations. The Windsor AQMA is centred on the Clarence Road roundabout and, under current proposals, two of the park-and-ride services would pass through this busy junction, as would the Alternative ORN. This junction is also on the route used by visitors to Windsor Castle and Legoland. It should be noted that peak visitor season would coincide with the Games.</p>	Noted, see above.
Appendix B	<p>It should be noted that 'A New Deal for Transport: Better for Everyone' has now been superseded by 'Creating Growth, Cutting Carbon – Making Sustainable Local Transport Happen', which was published in January 2011.</p>	Noted.

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Document reference	Comment	ODA response
<i>Comments from London Borough of Tower Hamlets</i>		
<p>Question 1: Do you agree with the general findings of the SEA that the Transport Plan will have a positive impact on the environment and that significant effects will be effectively managed by the mitigation proposals?</p>	<p>In general the Council agrees with the findings of this SEA that the Transport Plan will have a positive impact on the environment, assuming that the transport modelling conclusions presented are accurate and that the proposed mitigation is successful.</p> <p>It would have been useful for the SEA to have presented the impacts upon the road network in Tower Hamlets, given the borough's proximity to a number of venues and the fact that the whole of Tower Hamlets is within an Air Quality Management Area. The results as presented show the overall emissions trends, and despite this being a strategic assessment, it would have been useful for more resolution to have been used and presented within the analysis.</p> <p>The forecast reduction in traffic is based on the assumption that background traffic will be reduced from normal levels, as a result of the traffic management measures and the 'Games effect' seen at recent Games (where demand is reduced as residents reduce their normal levels of travel during Games time). We have not seen to date, details of the traffic management measures, and so cannot assess (as a borough) how effective they are likely to be.</p> <p>Once the precise nature of the diversions are known, it is essential that additional environmental assessment is carried out as these diversion, may lead to unacceptable noise impacts upon our residents during their operation.</p>	<p>Noted.</p>

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Document reference	Comment	ODA response
<p>Question 2: Are there any additional mitigation techniques for addressing the environmental impact of the Transport Plan which have been overlooked?</p>	<p>Potential local air quality impacts are alluded to within page 92 of the SEA document and within Table 17. The following mitigation is suggested: 'As the detailed planning of the ORN and PRN continues, it will be necessary to ensure that the arrangement for its implementation and the diversion of non-Games Family traffic do not lead to additional breaches of air quality standards.'</p> <p>Responsibility is then transferred to TfL to carry out further environmental appraisal at the detailed design stage. The Council would suggest that one of the principal reasons for carrying out an SEA is to identify and mitigate adverse impacts at the plan level, before the detailed design stage when the adverse effects are less easily avoided. Although they do not refer to TfL to the London Borough of Tower Hamlets, the last three paragraphs within page 92 of the SEA document offer a weak rationale for predicted local air quality impacts outside of London, and indeed appears to not make sense in part. Would suggest clarification needed.</p>	

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Document reference	Comment	ODA response
	<p>On page 102 of the SEA document 'requirements for project Environmental Impact Assessment for certain projects if appropriate' is named as one potential mitigation measure should the Transport Plan be predicted to have any significant adverse environmental impacts. It is considered that adverse impacts identified at the plan level should be mitigated at this early stage, as it is often a lot more problematic to mitigate/avoid these impacts at a project level. Indeed, any Environmental Impact Assessment of certain projects may simply serve to once again identify any potential significant impacts and fail to propose adequate mitigation.</p> <p>It should also be recognised that the need for EIA, and indeed the scope of such assessments are governed by the EIA regulations. Given the uncertainty which this introduces, it is considered that this is not a reliable mitigation measure.</p>	<p>Noted. The level of mitigation measures indicated in the Environmental Reports relates to the level of detail available on the Transport Plan proposals and their effects available at the time the analysis was undertaken.</p>
	<p>One of the specific mitigation measures highlighted on page 104 refers to 'temporary traffic management measures will be implemented along the ORN and PRN'. It is unclear how the particular measures proposed, including road closures, diversions and 'Games Lanes' will minimise environmental impacts. These measures are likely to lead to more congestion for local traffic and it is suggested that more explanation is needed to clarify how exactly these particular measures will benefit 'other road users'.</p>	<p>Noted.</p>

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Document reference	Comment	ODA response
Question 3: Is any significant environmental data missing or misrepresented?	<p>There are errors in the baseline relating to other parts of London (for example Lord's Cricket Ground has not been identified as a Site of Borough Importance for Nature Conservation.</p> <p>The assessment of impacts upon climate change (page 87) does not seem to take account of associated carbon emissions emanating from public transport (increased frequency, increased coverage, increase in carriage/bus numbers etc). It is worth noting that a relatively small percentage of public transport utilises renewable energy sources. Whilst the overall greenhouse gas emission during the Games may still fall within an effective travel demand management package, greater clarity should be provided as to which greenhouse gas sources have been included in these calculations. The Games are an opportunity to showcase the new generation of electric vehicles (recharged from renewable sources) as well as other greener vehicle types including cycling.</p> <p>The Council would have liked to have seen a greater discussion of alternatives. The document indicates that the 'without plan' scenario was to be considered, however, this is given relatively little commentary throughout the report.</p>	<p>Noted.</p> <p>Noted. This is implicit in the assessment of emissions from highway traffic, where the changes in traffic flow are assumed to include changes to public transport services also.</p> <p>The scope of the SEA examines the realistic alternatives to the Transport Plan that were considered by the ODA. In line with Government guidance on SEA, it is not the purpose of the SEA to decide the alternative to be chosen for the Transport Plan, which is the role of the ODA.</p>

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Document reference	Comment	ODA response
	<p>The SEA report accurately assesses the noise impact at residential receptors exposed to noise from major roads network, however, it does not appear to take into account the disturbance that will be likely from the minor roads used by the Games for transport, such as next to Omega Works in the London Borough of Tower Hamlets where the Lden will be less than 60dBA. The DEFRA noise maps were based on the major roads within the borough and this information was provided by the Local Authority and Transport for London, so these residential receptors are already likely to be exposed to a level above Lden 60 dBA. The DEFRA noise mapping predictions that were undertaken cannot be used to predict the noise impact at minor roads where no information was put into the noise model. The report should clarify whether these minor roads are included or excluded for disturbance monitoring purposes.</p>	<p>This will be a consideration in ongoing work planning the ORN and PRN being undertaken by and for the ODA and TfL.</p>
<p>Question 4: In terms of environmental impact, are there any alternative Transport Plan policies and plans which should have been considered?</p>	<p>The spectator and workforce transport plan for the Olympic Park is based on maximising use of available public transport and is an excellent example of environmental sustainability. The Council, however, would have liked to have seen greater numbers of the 'Games Family' required to use these modes.</p> <p>The TfL London Cycle Hire Scheme Phase Two (extension across Tower Hamlets) should include the area up to and including the Olympic Park for Games time and in legacy.</p>	<p>Noted.</p>

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Document reference	Comment	ODA response
<i>Comments from Client Earth</i>		
	The SEA fails to adequately assess the effect that the OTP will have on air quality in London. The SEA therefore does not comply with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the 'Regulations').	The SEA was based on the best-available information available at the time it was carried out.

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Document reference	Comment	ODA response
Proposed SEA objectives	<p>The SEA correctly identifies air quality as a key objective. However, the objective is stated as being 'to help maintain compliance with the National Air Quality Standards in all areas where these are predicted to be met by 2012 in the vicinity of the games venues.'</p> <p>It is important to note that the National Air Quality Standards, which derive from Regulations made under the Environment Act 1995, are underpinned by EU law. Directive 2008/50/EC, which has been transposed by the Air Quality Standards Regulations 2010, establishes legal limits, known as 'limit values', on ambient levels of certain air pollutants, including PM₁₀ and NO₂. While these limit values are set at the same level as the National Air Quality Standards, they are legally binding limits, rather than mere objectives. Under the Air Quality Standards Regulations 2010, the Secretary of State assumes responsibility for ensuring that limit values are complied with in England. The National Air Quality Standards, and the system of local air quality management which flows from them, can therefore be properly viewed as being supplementary to the achievement of the limit values under the Air Quality Standards Regulations 2010. The proposed air quality objective of the SEA should therefore refer to the limit values under the Air Quality Standards Regulations 2010 in addition to the National Air Quality Standards.</p> <p>It is also noted that the objective only relates to air quality in the vicinity of the Games venues, whereas the geographical scope of the SEA is stated as being the venues and the ORN.</p> <p>The objective should therefore correctly be expressed as follows:</p> <p>'to ensure compliance with the limit values contained in the Air Quality Standards Regulations 2010 in all areas where these are predicted to be met by 2012 in the vicinity of the Games venues and the ORN and PRN'.</p>	Noted.

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Document reference	Comment	ODA response
	<p>It is noted that the list of other plans and programmes reviewed in Appendix B does not include the air quality plan drawn up by Defra to support its time extension notification for PM₁₀ under Article 22 of Directive 2008/50/EC, despite that plan clearly being a plan or programme for the purposes of the Regulations.</p>	<p>Noted.</p>
<p>Baseline environment</p>	<p>The baseline scenario has been identified as the environmental conditions that would prevail in 2012 if the Transport Plan were not put into operation. Modelling work has been carried out to project what the baseline air quality conditions will be in 2012.</p> <p>I note with concern that this modelling projects that along the ORN and PRN:</p> <p>‘...the number of daily mean exceedences at some roadside sites is anticipated to be more than the allowable number of exceedences.’(Page 36)</p> <p>According to Table 7, the daily PM₁₀ limit value, which requires that ambient concentrations of PM₁₀ must not exceed 50 µg/m³ on more than 35 days in a calendar year, will be breached at two roadside sites in 2012: Marylebone Road and Tunnel Avenue.</p> <p>This contradicts projections contained in the Mayor's Air Quality Strategy and in the air quality plan accompanying Defra's time extension notification, both of which showed that the daily limit value would be achieved throughout Greater London by 11 June 2011 and not exceeded after that date.</p>	<p>The MAQS notes in fact that while predicted concentrations of annual mean PM₁₀ in 2011 indicate that London will continue to meet the EU limit value, there remain locations where these are greater than 40mg/m³ although these would not constitute a breach of the Air Quality Standards Regulations. This is not inconsistent with the analysis on baseline environmental conditions presented in the Environmental Report.</p>

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Document reference	Comment	ODA response
Alternative options	<p>The only two alternatives that are considered in the SEA are the baseline scenario, ie, no adoption of the Transport Plan, and the adoption of the Transport Plan. At Table 15, the SEA makes a comparative assessment of these alternatives against the SEA objectives. The effect of the OTP on the air quality objective is assessed as being a 'minor adverse effect.' However, no assessment is made of the effect of the baseline on air quality (I assume that the use of a question mark rather than a cross or tick denotes that the effect is unknown, although this is not clear from the table). I fail to see how an assessment can be made of the effect of the Transport Plan on air quality without first assessing the effect of the baseline on air quality.</p>	<p>The baseline environment in terms of air quality is set out on pages 29-38 of the Environmental Report, as referred to above.</p>
Assessment of environmental effects	<p>The SEA assesses that the Transport Plan will have 'minor temporary adverse effects in some specific locations, compared with baseline conditions' on local air quality. Therefore the SEA does not identify any significant adverse environmental effect that will be likely to arise from the operation of the measures contained in the Transport Plan.</p> <p>The assessment that the adverse impacts on air quality will be minor seems to be based on the premise that these impacts will be localised and only over a relatively short period. However, this is based on a fundamental misunderstanding of the legal framework governing air quality.</p>	<p>This comment is wholly consistent with the analysis presented in the Environmental Report, and why it is noted on page 92 that it will be necessary to ensure that the arrangements for implementation of the ORN and PRN does not lead to additional breaches in air quality standards. The ongoing work on planning for the ORN by and for the ODA and TfL is to this end.</p>

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Document reference	Comment	ODA response
	<p>The SEA acknowledges that at a number of locations quite large increases of traffic flow may occur as a result of the operation of the ORN and PRN. The SEA correctly states that it will be necessary to ensure that the implementation of the ORN and PRN does not result in additional breaches of air quality standards. However, it fails to make any assessment of whether this is likely to occur, instead seemingly deferring this to a further environmental assessment to be carried out by Transport for London.</p> <p>Any increase in traffic, and any decrease in baseline air quality could be highly significant if it causes breaches of limit values. This is of most concern in relation to the PM₁₀ daily limit value. Despite the inconsistencies between the assessment of baseline air conditions (to the extent this has been carried out) in the SEA and those contained in the Mayor's Air Quality Strategy and Defra's air quality plan, it is clear that compliance with the PM₁₀ daily limit value in 2012 is highly uncertain. In this context, any decrease in air quality as a result of the Transport Plan, and in particular the operation of the ORN and PRN, is likely to lead to the legal limit of 35 exceedences of the daily limit value being breached.</p> <p>Any decrease in air quality could also result in exceedences of either the hourly or annual mean limit values for NO₂ in 2012 at locations where they had already been attained in previous years. Further, the SEA acknowledges that all of the ORN falls within areas covered by Air Quality Management Areas. Generally, this is because in these areas the annual mean NO₂ limit value is being exceeded, usually by a very high margin. Levels of NO₂ therefore need to be reduced significantly if this limit value is to be achieved. Therefore any increase in levels of emissions will make it more difficult to achieve compliance with those limit values.</p>	<p>The development of detailed mitigation to avoid significant impacts on air quality arising from the operation of the ORN and PRN is the subject of ongoing work by the ODA and TfL. It is frequently the case that detailed mitigation is developed in this way when the need is identified at a strategic level in SEA.</p> <p>Noted.</p> <p>Noted</p>

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Document reference	Comment	ODA response
	<p>If the daily PM₁₀ limit value is exceeded in 2012 this will result in the European Commission escalating infringement proceedings against the UK which are currently on hold. This will result in the UK being referred to the Court of Justice of the European Union, which ultimately has the power to issue fines which could run to hundreds of millions of pounds. Further, any exceedence of a limit value would put the Secretary of State in breach of statutory duties under the Air Quality Standards Regulations 2010 and therefore exposed to possible domestic legal challenge through judicial review.</p> <p>Further, as limit values apply everywhere, a breach of the daily PM₁₀ limit value anywhere in Greater London would change the exceedence situation of the whole of the Greater London zone. So in this context, even local air quality impacts can have London wide consequences.</p> <p>Further, as limit values are expressed by reference to a calendar year, for example, a maximum of 35 exceedences of the daily PM₁₀ limit value per calendar year, even a short-term adverse impact on air quality will have long-term consequences if it would cause Greater London to be in breach of a limit value for the whole of the 2012 calendar year.</p> <p>In this context, any decrease in air quality, no matter how minor, temporary or local, must be regarded as being a significant adverse effect. This would be consistent with Schedule 1 to the Regulations, which sets out the criteria for determining the likely significance of effects on the environment. One of these criteria is the vulnerability of the area likely to be affected due to exceeded environmental quality standards or limit values.</p>	<p>This may be the case, but on the basis of the best-available information when the SEA work was conducted, it was not possible to draw this conclusion categorically.</p>

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Document reference	Comment	ODA response
Monitoring and mitigation	<p>Regulation 12 and Schedule 2, paragraph 7 of the Regulations requires that the environmental report contain measures to mitigate any significant adverse effects. Further, Regulation 17 requires those significant adverse effects to be monitored. The SEA does not contain any provisions for monitoring and mitigation as it does not assess that the Transport Plan will have any significant adverse effects. However, for the reasons identified above, a proper assessment of the impacts of the Transport Plan on air quality would identify a significant adverse effect, namely an increased risk of air quality limit values being breached in 2012. This will require the SEA to contain detailed mitigation measures that will fully mitigate that effect, along with provision for monitoring to ensure that those measures are effective.</p>	<p>Air quality monitoring is routinely undertaken in London, and this information would be used to monitor effects during the operation of the Transport Plan, in line with the SEA Regulations and Government guidance on SEA.</p>
Conclusion	<p>The SEA does not currently comply with the Regulations as it fails to properly assess the effect of the OTP on air quality. Consequently, it also fails to set out appropriate mitigation measures and establish a programme of monitoring of those impacts through the implementation phase.</p> <p>Any decision to adopt the OTP on the basis of this SEA would be unlawful and vulnerable to legal challenge through judicial review. The Olympic Delivery Authority is therefore requested to prepare a revised SEA which does the following:</p> <ul style="list-style-type: none"> - Restates the air quality objectives by referring to limit values contained in the Air Quality Standards Regulations 2010 in addition to National Air Quality Standards and by including the ORN and PRN in addition to the Games venues; 	<p>Noted.</p>

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Document reference	Comment	ODA response
Conclusion (cont.)	<ul style="list-style-type: none"> - Makes a proper assessment of the effect of the baseline on air quality, based on modelling used to support the Mayor's Air Quality Strategy and Defra's PM₁₀ time extension notification; - Assesses whether the Transport Plan will increase the risk that any air quality limit values will be breached in London in 2012; - Attaches proper weight to the significance of the Transport Plan's adverse effects on air quality; and - Where significant adverse effects are identified, sets out detailed, credible and appropriate mitigation measures and a programme of monitoring. <p>This is essential to protect the health of athletes, visitors and the people of London and to avoid costly and embarrassing legal action which would tarnish the reputation of the city and the 2012 Games.</p>	
<i>Comments from the City of London Corporation</i>		
	<p>The Environmental Report highlights the fact that air quality and noise impacts on the main through routes in the City of London may be significant as a result of diverted traffic (pages 92–94).</p> <p>The City of London is concerned that large increases in traffic flow may occur along the through route from Victoria Embankment, Upper and Lower Thames Street and on to Tower Hill. This road has been designated a 'priority location' in the Mayor's Air Quality Strategy due to the high level of particulate matter (PM₁₀). There are residential premises along this route.</p>	Noted.

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	<p>We are in very real danger of not meeting the daily Limit Value for PM₁₀ along this route in 2012. The City of London particulate monitoring station in Upper Thames Street revealed that the air quality did not meet the daily PM₁₀ Limit Value in 2010. The deadline for compliance is 2011. Any additional traffic is likely to lead to a definite breach of the Limit Value and potential fine from the EU. Transport for London is currently conducting a trial of a dust suppression technology along this route. Presumably this will be undertaken during the Games, if the trial proves to be successful. If dust suppression has very little or no impact, TfL needs an alternative plan to make sure particulate levels stay below the required limit. Consequently, the City of London would like to be advised of the proposed plan to mitigate high levels of pollution along this route.</p> <p>The City of London would also like to be advised of the proposals for minimising the exposure of residents, along this route, to unacceptable levels of traffic noise.</p> <p>It is not clear in the report if consideration has been given to the potential impact on local air quality and noise, due to traffic displaced into the City core area, as a result of the ORN and PRN restrictions. It would appear that, as the anticipated change in traffic numbers is less than 10 per cent, it has not been considered (page 83).</p> <p>An increase in traffic of up to 10 per cent could have a measurable impact on air quality on some other City roads, for example, Farringdon Street/Ludgate Circus/new Bridge Street, and result in a breach of the PM₁₀ daily Limit Value. The City would like the impact on local air quality considered in more detail across the entire Square Mile, given the existing high levels of PM₁₀ and nitrogen dioxide.</p>	<p>Noted.</p>

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	<p>The Environmental Report should include details of <i>‘the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme’</i> (SEA Regulations – Schedule 2). The City of London would expect the Environmental Report to include details of the proposed mitigation measures which will be implemented in order to avoid breach of air quality limit values within the City. Further mitigation aimed at minimising the air quality and noise impacts of the Transport Plan within the City should also be recommended for incorporation into the final Transport Plan.</p>	<p>This will be addressed by the ongoing work on planning the ORN and PRN being undertaken by and for the ODA and TfL.</p>

CONTROL SHEET

Project/Proposal Name Transport Plan for the London 2012 Olympic and Paralympic Games

Document Title Strategic Environment Assessment Environment Report Post-Adoption Statement

Client Contract/Project No. -

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V2	07 September 2011	Final Draft to client for review
V3	12 June 2012	Final Draft to client for review
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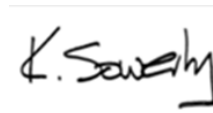
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