

Olympic Delivery Authority

Transport Plan for the London 2012  
Olympic and Paralympic Games  
Strategic Environment Assessment  
Environment Report  
Post-Adoption Statement  
April 2008



# MOVE



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# Introduction

## Background

The Olympic Delivery Authority (ODA) was established by the London Olympic Games and Paralympic Games Act 2006 “the Act”. One of the requirements of the Act is that the ODA prepares (and keeps under review) a plan for addressing transport matters relating to the London 2012 Olympic and Paralympic Games<sup>1</sup>.

A draft of this plan was issued by the ODA in October 2006<sup>2</sup> (referred to hereafter as ‘the Transport Plan’). After an extensive consultation exercise conducted in accordance with the Act, the Transport Plan was published in October 2007<sup>3</sup>. This plan, prepared by the ODA’s Transport team, sets out an overview of the proposed transport arrangements for the London 2012 Games. It presents the mission, objectives, and key strategic directions that will form the basis of the forthcoming planning and delivery of transport for the Games. The Transport Plan will be subject to further revision closer to the Games.

The European Directive 2001/42/EC<sup>4</sup> (“the SEA Directive”) requires all national, regional and local authorities to carry out a formal strategic environmental assessment (SEA) of certain types of plans, of which transport is one. In England, the Directive has been implemented via regulations<sup>5</sup> (referred to here as ‘the SEA Regulations’). Since the Transport Plan is a requirement of an act of parliament, it is a plan within the meaning of the SEA Regulations.

The SEA aims to ensure that environmental impacts are taken into account at the earliest stages and throughout the plan’s development. Its main objectives, as stated in the SEA Directive, are to:

- provide for a high level of protection of the local environment; and
- contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development<sup>6</sup>.

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<sup>1</sup> London Olympic Games and Paralympic Games Act 2006, 2006 Chapter 12, Clause 10.

<sup>2</sup> Olympic Delivery Authority (2006) - **Transport Plan for the London 2012 Olympic Games and Paralympic Games** – Consultation Draft October 2006.

<sup>3</sup> Olympic Delivery Authority (2007) - **Transport Plan for the London 2012 Olympic and Paralympic Games** - First Edition October 2007.

<sup>4</sup> 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, p.30. Available at [www.ec.europa.eu](http://www.ec.europa.eu)

<sup>5</sup> The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004 No.1633). Referred to hereafter as ‘The SEA Regulations’.

<sup>6</sup> Directive 2001/42/EC - ibid - Article 1.

## The Post-Adoption Statement

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 SEA<sup>7</sup> 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.'

The prescribed coverage of the Post-Adoption Statement is<sup>8</sup> 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.

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 1.1 on the following page.

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<sup>7</sup> Department for Transport (2004) - **Strategic Environmental Assessment for Transport Plans and Programmes** - Transport Analysis Guidance (TAG) Unit 2.11, December 2004. Quote extracted from Table 2.2. Stages, decisions and outputs of SEA.

<sup>8</sup> Set out in Regulation 16(3) of the SEA Regulations.

**Table 1.1** SEA statement - checklist developed from SEA regulations

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

Further information has been included in this report, some of which was suggested by guidance offered by Transport Research Laboratory (TRL)<sup>9</sup>, 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**

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 Legal teams have also contributed to this process, supplying information and feedback on work in progress.

The following documents have been produced to date, and can be accessed at the locations given in Table 1.2 on the following page:

<sup>9</sup> TRL, November 2005, **Strategic Environmental Assessment of Local Implementation Plans: SEA Statement**, produced for Association of London Government. Available from [www.sea-info.net](http://www.sea-info.net)

**Table 1.2 SEA documents produced to date**

<b>Document</b>	<b>Date</b>	<b>Purpose</b>	<b>Where to access</b>
SEA Scoping Report	Sept 2006	Set context, establish environmental baseline, identify problems and negative impacts and decide objectives. Document distributed for consultation with environmental bodies.	Available on request from: Transport Team Olympic Delivery Authority 21st 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.	Sent to stakeholders and available on request from ODA offices (see address above).
Adopted Transport Plan, Environmental report and SEA Post-Adoption Statement (this document)	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.	Sent to stakeholders and available on request from ODA offices (see address above) and available on the London 2012 website ( <a href="http://www.london2012.com/transportplan">www.london2012.com/transportplan</a> ).

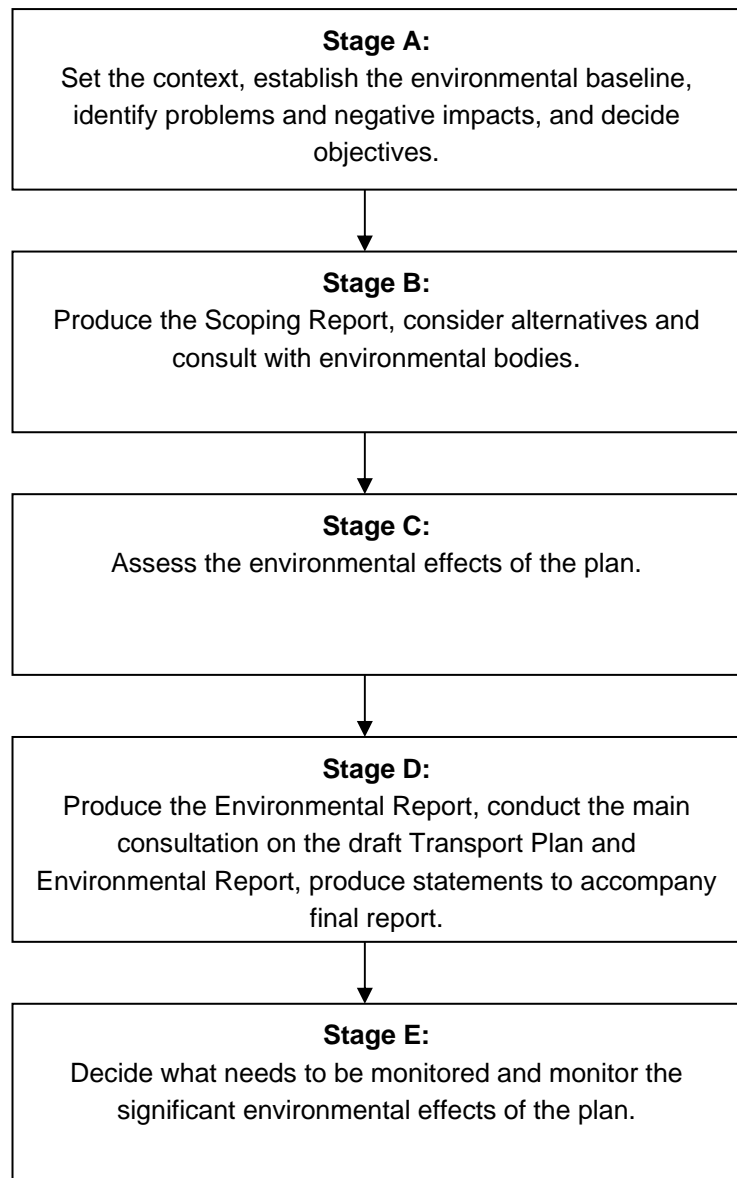
# The SEA process

## The process and stages completed to date

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 2.1** below:

Stages A and B culminated in the production of the SEA Scoping Report in September 2006. Stages C and D were completed to coincide with the publication of the Consultation Draft of the Transport Plan in October 2006.

**Figure 2.1 SEA key stages<sup>10</sup>**



<sup>10</sup> Adapted from ODPM (2005) – **A Practical Guide to the Strategic Environmental Assessment Directive** – Figures 5 and 6.

At Stages B and D, the four statutory environmental bodies (the Environment Agency, English Heritage, English Nature and the Countryside Agency<sup>11</sup>) 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 Report<sup>12</sup> (Stage D).

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**

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.

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;

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<sup>11</sup> English Nature, the landscape, access and recreation elements of the Countryside Agency and the environmental land management functions of the Rural Development Service were merged to form a new Government agency, Natural England, on 1 October 2006. The new agency assumed the statutory roles of those former agencies from that date in relation to consultations on SEA in England.

<sup>12</sup> Steer Davies Gleave (2006) - **Strategic Environmental Assessment of the Transport Plan for the London 2012 Olympic and Paralympic Games: Environmental Report** – Olympic Delivery Authority, October 2006. Available at [www.london2012.com/transportplan](http://www.london2012.com/transportplan)

- 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 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
- no significant adverse environmental effects that will be likely to arise from the operation of the measures contained in the Transport Plan were identified.

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

- making best use of existing public transport, and supplementing them where necessary during the Games;
- designing new venues to ensure that adequate provision is made for public transport, walking and cycling;
- choosing venue locations specifically to minimise journey times between these and athlete accommodation;
- maximising the use of the rail networks for spectator and workforce travel, and supplementing these with buses and coaches;
- promoting walking and cycling to all venues;
- using opportunities provided by the River Thames as an alternative transport option; and
- using procurement and travel planning to minimise oversupply and to maximise the efficient utilisation of resources.

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

- No private car parking provided for spectators at any venue, except for some parking for Blue Badge holders.
- Strict parking controls will be implemented on a temporary basis around each venue.
- 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 along the Olympic Route Network (ORN) to ensure reliable journey times for Games Family vehicles and minimise the impact of Games traffic on other road users.
- Establishing a Transport Coordinations Centre (TCC) to help keep London moving.
- An 'Active Spectator Programme' to ensure that active travel modes such as walking and cycling are used as effective transport modes.

- Athletes, officials and accredited media will be able to travel on all public transport within the Greater London area free of charge.
- People working at the Games venues will be expected to travel by public transport, with 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 influence the proportion of spectators that travel by different modes and on particular routes. Tickets to Games events and competitions will include free travel on public transport in London for the day of the event to encourage spectators to use the transport system and take part in the festivities throughout the city.
- A 'marketing relationship' will be developed with each spectator as soon as an enquiry about tickets is made.
- It is proposed that the Olympic Park will be designated as a Low Emission Zone (LEZ) during the Games.
- Where possible, low- or zero-emission vehicles will be used throughout the Games fleets of cars, buses, coaches and service vehicles.
- An In-Village Transit System (IVTS) will provide a continuous shuttle bus service around the Olympic Village, using accessible, zero- or low-emission vehicles.

Consequently, no specific further mitigation measures were identified in the Environmental Report.

Along with responses to the consultation on the SEA, the ODA Transport team reviewed the material presented in the Environmental Report, with issues drawn out and categorised according to the chapter and subject areas within the Consultation Draft of the Transport Plan. These issues were then allocated to specific ODA transport managers (responsible for that particular area or chapter), who were asked to consider and review these in the light of the draft Transport Plan. Two review and planning sessions also took place to consider the responses and to draw out key themes and issues.

Taking account of the findings of the Environmental Report, the First 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.

A new chapter on sustainable transport highlights the commitment of the ODA and the London Organising Committee for the Olympic Games and Paralympic Games (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 ODA's Transport team is drafting a 'Transport Sustainability Plan'. This Plan will include 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 be monitored between now and 2012.

- A Sustainable Transport Forum has been established, with the remit to ensure the proper communication and coordination of all the transport activities that may impact on the delivery of a sustainable Games.
- The ODA and LOCOG have commissioned a number of studies that will contribute to the development of the overall strategy, including:
  - a review of the existing Transport Sustainability Strategy;
  - a study to define the boundaries of the carbon footprint of the Games and an initial estimate of its size;
  - a study to determine innovative mechanisms for reducing the defined carbon footprint; and
  - an evaluation of the key stakeholders relating to sustainable transport.

In response to particular concerns expressed about the potential environmental effects of freight and servicing transport during the Games, a new chapter was also included in the First Edition of the Transport Plan dealing specifically with these issues. The chapter notes that a Head of Logistics will be recruited by LOCOG and a logistics strategy will then be developed in accordance with UK, London and local freight and distribution policy, including the forthcoming London Freight Plan.

An important point to note is that the ODA envisages that London 2012 will be 'A public transport Games' – The ODA is aiming for 100 per cent of spectators to get to the Games by public transport, cycling or on foot.

# Consultation

## Stages of consultation

Consultation is an integral part of the strategic environmental assessment 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 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 18 August 2006. 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 September 2006, and formally invited their comments on it. These comments were taken into account in carrying out the assessment of environmental effects in the SEA and preparing the Environmental Report. This was documented in Appendix D to the Environmental Report.

## Consultation on the Environmental Report

When the Environmental Report was published with the Consultation Draft of the Transport Plan in October 2006, 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 Plan<sup>13</sup>. 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<sup>14</sup>, and were taken into account in the drafting of the First

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<sup>13</sup> 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.

<sup>14</sup> Olympic Delivery Authority (2007) - **Transport Plan for the London 2012 Olympic and Paralympic Games: Consultation Report** - Part 4, October 2007. Available at [www.london2012.com/transport-plan](http://www.london2012.com/transport-plan). Part 4 of the report is reproduced for information as **Appendix A** to this report.

Edition of the Transport Plan, as described in 'The SEA process', page 8. The responses to comments received specifically on the Environmental Report are reproduced in Appendix A.

### **Modifications to the SEA arising from the consultation**

#### Scoping stage

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:

- PPG16 (Archaeology & Planning) was also included in the policy review undertaken for the SEA on the advice of English Heritage.
- A commitment was provided to continue to consider specific effects of the Transport Plan on access land, public open land and rights of way as the ODA develops the measures contained in future updates of the Transport Plan, in response to concerns raised by Natural England.

#### After publication of the Environmental Report

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

- Due weight was given to fact that the coastline adjacent to Weymouth is part of the Dorset and East Devon World Heritage Site, as indicated by Natural England. The Sailing competition will be a non-ticketed event and it is estimated that some 30,000 spectators will use a range of coastal vantage points on beaches and cliff tops. The ODA will continue to work closely with the Environment Agency and Natural England on the design and development of the facilities to be provided at Weymouth to avoid or mitigate any potentially adverse impacts<sup>15</sup>.
- It was noted that Woolwich Common adjacent to the Royal Artillery Barracks venue is a Site of Borough Importance for nature conservation, and that Wimbledon Common is also a Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI).
- The ODA will measure the carbon footprint of the Games, and explore carbon offsetting among the Games Family for those arriving by air, as suggested by Transport for London. It is intended that the Games provide a platform for demonstrating long-term solutions to carbon reduction, including carbon offsetting<sup>16</sup>. London 2012, in partnership with the Department for Environment, Food and Rural Affairs (DEFRA) and the Renewable Energy and Energy Efficiency Programme (REEEP), is investigating potential carbon offset projects via the Clean Development Mechanism of the Kyoto Protocol.<sup>17</sup>

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<sup>15</sup> See: Olympic Delivery Agency (2007) – **Sustainable Development Strategy** - p.52. Available at [www.london2012.com](http://www.london2012.com).

<sup>16</sup> The Olympic Board (2007) - **London 2012 Sustainability Policy** – 18 October 2007. Available at [www.london2012.com](http://www.london2012.com).

<sup>17</sup> See: Olympic Delivery Agency (2007) – **Towards a One Planet 2012: London 2012 Sustainability Plan** - p.19. Available at [www.london2012.com](http://www.london2012.com).

- The ODA concurs that Environmental Impact Assessment (EIA) for individual schemes included in the Transport Plan will not take account of cumulative effects in the same way as the SEA has, as was pointed out by Westminster City Council. Nevertheless, the consideration of baseline environment in the EIAs for individual schemes should include the cumulative effects for projects where these have already been given consent.
- The status of the Serpentine has been taken account in considering the potential impacts of activities in Hyde Park, as requested by Westminster City Council. As part of a Site of Metropolitan Importance for nature conservation, the Serpentine is an artificial lake with a clay floor and concrete sides. It is fed by 'top up' from the St. James's Park artesian well and has little emergent vegetation around the margins, which is not sufficient to provide significant habitat or improvement to water quality. The island supports the most interesting flora (eg water figwort and great willowherb), and mature trees, shrubs and tall herbs provide good nesting cover for wildfowl. There is no captive waterfowl collection, but wild mallard, mute swan, coot, moorhen, tufted duck and great crested grebe breed on or near the lake. There is a large population of Canada geese, which has led to serious problems with water quality by overloading the water with nutrients, resulting in eutrophication. Small numbers of pipistrelle and noctule bats occur feeding around the Serpentine, although no roosts have been recorded. The nature, scale and management of the activities proposed at the Hyde Park venue during the Games are unlikely to result in any significant adverse environmental effects on the quality of water in the Serpentine, or the flora and fauna that depend on this.

In response to a further point made by Westminster City Council, the Transport Plan reaffirms that underpinning the transport strategy is its ambition to host a 'public transport' Games. The aim is for 100 per cent of ticketed spectators to travel to the Games by public transport, or by walking or cycling. There will be no private car parking for spectators at any venue (except for some Blue Badge parking).

# Alternative options

## Alternatives considered

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.

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'<sup>18</sup> (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'.

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

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.

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<sup>18</sup> The 'Best Practical Environmental Option' (BPEO) is a concept developed by the Environment Agency and widely used in environmental planning. In summary, it describes the option which ensures the most benefits and least damage to the environment in both the long and short term, at an acceptable cost.

## Approach

During the development of a monitoring strategy, the DfT guidance<sup>19</sup> suggests that the following questions are addressed:

### What needs to be monitored?

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<sup>20</sup>.

### What sort of information is required?

The guidance<sup>21</sup> 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 eg emission levels).

### What existing sources of monitoring information are there?

This requires checking what existing sources of monitoring information are available (eg 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<sup>22</sup> 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?

This was previously examined following consultation on the Scoping Report, at an earlier stage in the SEA process (see **Stage B** in **Figure 2.1** above). 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.

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<sup>19</sup> Department for Transport, (2005) - **Strategic Environmental Assessment for Transport Plans and Programmes** - TAG Unit 2.11, Appendix 8: Monitoring.

<sup>20</sup> Although the SEA has not identified any significant environmental effects likely to arise from implementation of the Transport Plan, it is still necessary to set up a monitoring framework to fully comply with the requirements of the SEA Regulations. Under Regulation 17(1), The ODA is required to 'monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action' (author's emphasis).

<sup>21</sup> Department for Transport, (2005) – **Ibid.**

<sup>22</sup> Steer Davies Gleave (2006) - **Strategic Environmental Assessment of the Transport Plan for the London 2012 Olympic Games and Paralympic Games: Environmental Report** – Section 7: Monitoring - Olympic Delivery Authority, October 2006. Available at [www.london2012.com/transportplan](http://www.london2012.com/transportplan)

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

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**

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, 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.

At the scoping stage of this SEA, objectives and indicators were selected and submitted for comment to the statutory environmental bodies<sup>23</sup>. 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<sup>24</sup>.

Local Transport Plans (or Local Implementation Plans in London) were published in 2005 by the relevant local authorities in all the areas where the London2012 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.

For example, Table 5.1 on the following page sets out the key elements of the monitoring activity that was recommended by the SEA of the Local Transport Plan for Hackney (one of the local authorities within which the Olympic Park is situated).

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<sup>23</sup> See: Steer Davies Gleave (2006) - **Strategic Environmental Assessment of the Transport Plan for the London 2012 Olympic Games and Paralympic Games: Environmental Report** – Table 2.2 - Olympic Delivery Authority, October 2006. Available at [www.london2012.com/transportplan](http://www.london2012.com/transportplan).

<sup>24</sup> ODPM et al (2005) - **A Practical Guide to the Strategic Environmental Assessment Directive** – Appendix 10, p.88.

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.

The relevant information on flooding and water quality is routinely monitored by the Environment Agency, and is available on the Agency's website. The SEAs for the Local Implementation Plans in London and the Local Transport Plans in other areas where the London 2012 Games venues are located all identified similar monitoring programmes.

**Table 5.1 Selected monitoring measures identified in the SEA for the Hackney Local Transport Plan**

<b>SEA topic area</b>	<b>Performance indicator</b>	<b>Data availability</b>
Climate change	Level of CO <sub>2</sub> 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 <sub>2</sub> and PM <sub>10</sub> ).	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 sites.	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

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 the Strategic Environmental Assessment, Environmental Report

## Response to consultation comments on the Environmental Report on the Transport Plan for the London 2012 Olympic Games and Paralympic Games

Ten responses were received that directly related to the Strategic Environmental Assessment (SEA), Environmental Report. The following tables outline the comments made by each respondent (on a respondent by respondent basis), the document reference to where the comment refers and the ODA response.

### Comments from Natural England

Document reference	Comment	ODA response
Baseline Environment, Executive Summary	Bullet point three is a little ambiguous. It conflates 'protected areas', which is short-hand for sites of biodiversity (or landscape) interest with statutory protection, with sites of nature conservation interest which are non-statutory sites afforded a degree of protection through the land use planning process. There are the latter sites within and adjacent to the Olympic Park.	Noted.
Baseline Environment, Executive Summary	In addition to Maritime Greenwich the coastline adjacent to Weymouth is also a World Heritage Site ie the Dorset and East Devon World Heritage Site.	Noted. This will be referred to in the Post-Adoption Statement.
Biodiversity, Flora and Fauna, Para. 3.18 p.23	Hackney Marshes per se is not a Site of Metropolitan Importance for nature conservation, nor is it one of the most important areas for wintering birds. Most of it is amenity grassland (football pitches) although the margin adjacent to the River Lea and Lee Navigation do support some very valuable wildlife habitat and are part of the Lea Valley Site of Metropolitan Importance.  Victoria Park is a Site of Borough Importance for nature conservation.	Noted. Source material used to define the baseline for the SEA had indicated that Hackney Marshes was indeed an important wintering area for water birds.

Biodiversity, Flora and Fauna, Para 3.18 p.24	'...some ponds and wetlands...' Which ponds and wetlands? Are they relevant to the assessment? '...of Borough or Local Significance.' Should be Borough or Local <u>Importance</u>	The individual ponds and wetlands are not significant to the assessment as they are not directly affected by the Transport Plan's proposals.  Noted.
Biodiversity, Flora and Fauna, Para.3.19 p.24	'...a Principal Site of Nature Conservation'. This term is not one in standard use across London. Non-statutory sites in London are Sites of Metropolitan/Borough/Local Importance.	Noted.
Biodiversity, Flora and Fauna, Para.3.20 p.24	Reference should also be made to the UK BAP and the London BAP. More relevant key species are water vole and sand martin.	Noted.
Biodiversity, Flora and Fauna, Para.3.37 p.28	Detailing the historic losses of SINC's in Newham is interesting but there is nothing here about the existing resource against which the assessment will be made.	Noted.
Biodiversity, Flora and Fauna para.3.38 p.28	A useful summary of the resource on Greenwich but it does not specify those parts of the resource which are relevant to the assessment. Why include a footnote about Sites of Metropolitan Importance (SMI) here when these have been mentioned several times already in preceding paragraphs? Woolwich Common is a Site of Borough Importance. This is adjacent to the Royal Artillery Barracks venue.	Noted. Noted. This will be referred to in the Post-Adoption Statement.
Biodiversity, Flora and Fauna para. 3.76 p.41	Wimbledon Common is also a Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI).	This will be referred to in the Post-Adoption Statement.
Biodiversity, Flora and Fauna para. 3.109 p.44	Should be County Wildlife Site, not Country. County Wildlife Site and Site of Importance for Nature Conservation are interchangeable terms, therefore 'formerly' is irrelevant. It would be appropriate to state why it is a County Wildlife Site, that is what are the features present.	Noted. Noted.
Biodiversity, Flora and Fauna paras.3.97/3.98	An interesting pen-portrait of the site but nothing substantive – are any of the breeding bird species of particular conservation interest, does the wide range of flora and fauna include protected species? Why does this site deserve a pen-portrait whereas other (more important sites) are described more succinctly?	Noted. The different treatment reflects solely the material available from the sources used to collate the baseline information.

Biodiversity, Flora and Fauna para 3.120 p.46	Of all the areas considered in the report the areas surrounding the sailing venue are the most important areas for biodiversity and landscape, yet it receives the briefest of descriptions. Furthermore, the sailing competition will be a non-ticketed event and it has been acknowledged that spectators will use a range of coastal vantage points. Consequently it would be appropriate to consider these locations when establishing the baseline. Information must be available from local authorities as to the most frequently used vantage points as the area regularly hosts sailing competitions.	Noted. This will be specifically referred to in the Post-Adoption Statement.
Biodiversity para.5.15	The conclusions regarding biodiversity relate only to the Olympic Park and the London venues. Why no mention of the other venues, especially sites around Weymouth and Portland, which could potentially experience the most severe adverse impacts?	Noted. This will be reviewed.
Appendix B	PPS9 has replaced PPG9.	Noted.

### Comments from English Heritage

Document reference	Comment	ODA response
General	Limiting the SEA objectives to venues associated with the Games and Olympic Route Network fails to consider the broadbased effects, including activities such as upgrading rail and underground stations, extensions of rail services, construction of additional infrastructure and temporary or longer-term alterations to transport routes, signage, street furnishings etc.	These proposals are not being provided directly and exclusively for the Olympic Games and Paralympic Games, and would have been implemented in any event. Para 2.28 of the report indicates that these are excluded from the SEA. This is because they will be the subject of other SEAs (for example, for the Mayor's Transport Strategy, Local Implementation Plans in London, or local transport plans outside London), and to include them in the scope of the present study would be to duplicate this effort. For the purposes of the present study, these proposals are taken to be part of the baseline case.

Document reference	Comment	ODA response
General	It would be more appropriate to adopt a broader base for consideration of the potential impacts of the transport implications of the Games. This would include consideration of impacts derived from all modes of transport and the associated improvements that are highlighted as necessary in the present document. It would also address all routes that might be reasonably considered to be affected by transport demands of people travelling from all over the country, and overseas, to be a part of the Games experience. The SEA is presently limited to venues and the Olympic Route Network, which limits an appreciation of the potential effects on heritage.	This was not possible in that the temporary traffic management measures were not identified in this version of the Transport Plan. Also, the effects described in this comment would be too diffuse to be likely to have any significant impact on the environment in general or heritage resources in particular. There certainly would be no direct impacts, as there are no infrastructure proposals relating to these places in the Transport Plan.
General	Consideration should also be given to the potential flow on impacts in areas not directly involved in the travel routes or venues. These effects would presumably be short term, and linked to the occasions when Games activities were in that locality. However, they are nevertheless an important consideration for heritage.	It is considered that there would not be any impacts of this type on heritage resources, and so this was excluded from the scope of the assessment.
General	The SEA objectives, as they stand, do not adequately consider the potential positive, negative and neutral effects on heritage which might derive from the Games. It is suggested that the objective relating to heritage resources be amended to: 'To avoid damage to designated features and areas designed to protect cultural heritage, and where possible, to enhance those features in the vicinity of the Games venues, access routes and areas to be affected by alternative routes, parking, mooring and other requirements for Games-generated traffic and temporary diversion of local traffic.'	This suggested revision is not considered appropriate because it is difficult to see how proposals in the Transport Plan could enhance heritage resources. The remaining rewording, relating to access routes etc. is accepted, but it is considered that significant effects of this type are extremely unlikely.
General	A similar approach would be necessary to achieve a sustainable outcome in relation to 'designated features and areas designed to protect the visual quality of landscape and townscape ...'. Such an approach may be more consistent with sustainable outcomes both during, and as a consequence of, hosting the Games.	Noted. As above.

<b>Document reference</b>	<b>Comment</b>	<b>ODA response</b>
General	The related indicators are similarly flawed. Listing the number of places affected will not provide for their protection or enhancement. Rather it provides a baseline against which the effects of the plan could be measured. The targets for an SEA consistent with the commitments contained in the London 2012 Games bid should include the 'identification, conservation and protection' of places of heritage significance. This would ensure that the Games have a positive effect for England's heritage. The measures should consider the proportion of such places that have been positively or neutrally affected by the transport strategy 'in the long term', as well as the potential negative effects which would, ideally be short term.	It is difficult to see how 'identification, conservation and protection' can be made targets, which by definition are specific and quantified.  The longer-term transport projects that will serve the Games venues would have been provided in any event, and are not specifically or exclusively provided for the Games. These are considered as part of the baseline in the present assessment.

### **Comments from the Highways Agency**

<b>Document reference</b>	<b>Comment</b>	<b>ODA response</b>
Paragraphs 2.24–2.27	Use of park and ride may result in additional car trips and attract spectators who might otherwise make most of their trip by public transport. Paving vast areas (either temporarily or permanently) may also have an adverse effect on biodiversity. The Highways Agency considers that direct coach might offer a more environmentally sustainable solution.	While there is some evidence to suggest such schemes have a generation effect, car mileage generally decreases due to use of park and ride facilities, most significantly where park and ride is part of a wider strategy to avoid long-stay car parking in city centres. Other studies have also indicated that for park and ride in urban areas, there is a net reduction in car vehicle kilometres in most cases.  The question of park and ride sites is still being considered in the development of the Transport Plan. This will also be dependent on obtaining all necessary consents and compliance with environmental requirements for the implementation of specific park and ride sites.

### Comments from the Greater London Authority Group

Document reference	Comment	ODA response
Para. 9 and Table 2.2	The SEA objective wording for noise in para. 9 is not entirely consistent with that in Table 2.2. The latter is preferred. The proposed indicators in Table 2.2, 'number of complaints', and 'traffic noise levels above 68 dB(A) L <sub>10</sub> ', while practical and cost-effective in the circumstances, would not wholly measure achievement of the para. 9 objective, while L <sub>10</sub> would not be appropriate for railway noise if that is included in the Table 2.2 objective. In practice, it appears that a +25% or –20% traffic flow change has been used to assess whether a noise change would be significant. This would be satisfactory, but objective and indicator wording should be clarified.	Noted.
Page 65, Bullet 8	<p>An Olympic Park Low Emission Zone (LEZ) is mentioned, with electric vehicles to be used inside the Park itself. There are a number of issues:</p> <ul style="list-style-type: none"> <li>– It needs to be stated whether the electric vehicles will be recharged from renewable sources or not.</li> <li>– All Games venues should be defined as Low Emission Zones; all vehicles used by the Games Family will be under five years old and the general public will be encouraged to use public transport to travel to each venue. Parking of private vehicles will be restricted.</li> <li>– There needs to be a reference to the proposed London-wide LEZ which will be in operation in 2008.</li> </ul> <p>The issue of refuelling infrastructure also needs to be addressed, in particular where new fleets of alternatively fuelled vehicles are to be provided during the Games. Consideration should be given to continued operation after the Games of any new refuelling depots etc.</p>	Future versions of the Transport Plan will consider these issues in more detail.
Row 1 of Table preceding para. 7.5 p.68	Any noise maps prepared in association with the LIP process would not automatically provide for Games-time monitoring, as seems to be implied here. Noise maps covering many of the venues will be produced for 2007 and 2012 under the Environmental Noise Directive 2002/49/EC.	Noted.
Glossary, 'L <sub>10, 18hour</sub> ', Line 3:	'It is the specified' should be reworded, ie '68 dB(A) L <sub>10, 18-hour</sub> ' is the specified...'	Noted.

### Comment from Hertfordshire County Council

Document reference	Comment	ODA response
General	The SEA understandably does not consider alternatives to the Transport Plan's preferred strategy and objectives. However, there is no objective to avoid congestion and other impacts to the detriment of other users such as commuters. This aspect and the danger of failing to provide sufficient park and ride sites for those choosing to drive part of the way is not therefore considered in the SEA. To reduce this problem and to minimise CO <sub>2</sub> emissions (one of the SEA objectives) specific policies are needed to persuade people to use passenger transport (national rail) for the whole journey from home to London rather than drive most of the way and then take the train. Reduced rail fares as part of the tailored travel plan with each ticket would be one way and the costs and benefits of this should be addressed.	Avoiding congestion may need to be an objective for the Transport Plan, but it is not considered appropriate as an objective for the SEA. Congestion is a cause of environmental impacts, but not an environmental impact in itself.

### Comments from Transport for London

Document reference	Comment	ODA response
General	There could be an assessment of the ability of the strategy to align with resource reduction, provision of waste and recycling facilities, and use of renewable or low-carbon technologies.	The Transport Plan aligns with these aims generally by encouraging the use of more environmentally friendly modes of travel. Waste and recycling facilities are unlikely to be provided specifically in relation to transport, although existing arrangements by TfL, and more general waste management measures adopted for the Games may provide these.
General	The process could examine the impacts of delivering freight such as equipment and fresh goods immediately prior to the period of the Games. An alternative transport strategy element could potentially be the inclusion of an Olympic Park Low Emission Zone (LEZ).	It is unlikely that this activity will generate sufficient traffic to cause significant environmental impacts. It is already proposed that the Olympic Park will be a LEZ (see para. 6.13, p.64 of the Environmental Report).
General	There would be both benefit and opportunity in enhancing the sustainability aspect of the strategy option for the Games Family dedicated car fleet or car pool services, as well as for workforce travel needs. This would help to reinforce the sustainability message inclusively to the public, and Games Family members alike.	Noted.

Document reference	Comment	ODA response
General	<p>It is welcomed that where possible, low- or zero- emission vehicles will be used throughout the Games. In addition to using the 'most practicable, cost-effective 'green' technology of the time', investment and project development could take place early on, to ensure that low-carbon vehicles are available in time. The ODA could start to identify and work with key partners who could provide such vehicles for use during the Games. This partnership would provide a mutual benefit of early market drivers and investment and high profile publicity for the partner companies and their technologies.</p>	Noted.
General	<p>Within the requirements for transporting the Games Family, there is still scope to consider the use of other sustainable travel methods such as:</p> <ul style="list-style-type: none"> <li>– car club vehicles (these would be used best in an area where they provide legacy value);</li> <li>– car lift sharing;</li> <li>– taxi sharing (for example, used during Wimbledon fortnight from rail station to ground); and</li> <li>– pedicabs.</li> </ul>	Noted.
General	<p>We note that the Transport Plan scope does not include international travel, but nevertheless encourage the ODA to promote carbon offsetting among the Games Family for those arriving by plane. This could be done by providing offsetting facilities at London 2012 accommodation sites, for example.</p>	Noted. This will be referred to in the Post-Adoption Statement.
Section 6	<p>Other mitigation measures that could potentially be included (if they do not already appear) may include:</p> <ul style="list-style-type: none"> <li>– travel demand management techniques (reducing the need to travel through better land use planning and/or initiatives to encourage people to walk and cycle where possible); and</li> <li>– impacts of the Low Emission Zone (LEZ).</li> </ul>	These are mentioned in Section 6 of the Environmental Report.

Document reference	Comment	ODA response
Section 2.5	The amount of spectators travelling by public transport will depend on travel demand management. Department for Transport and TfL could help the ODA develop the details of this plan. They could also link with these partners and others to provide multimedia awareness-raising campaigns prior to the Games. TfL welcomes the Active Spectator Programme and the fact that walking and cycling to all venues will be promoted. In addition to providing new or enhanced routes, there is also a need to provide secure bike storage based on sound estimates of usage, and/or innovative measures such as 'share and take bikes', as well as walking and cycling maps.	Noted. These matters are being addressed.
Section 2.8	TfL originally questioned the impacts on roads that feed into the Olympic Road Network (ORN) regarding air quality, CO <sub>2</sub> and noise levels in particular. We now understand that assessments of the effects on air quality due to the measures associated with the ORN will be carried out when more detail of the likely traffic effects has been modelled. If this information is available when the Transport Plan is updated (as indicated in para. 1.10 of the report), further SEA work will be required.	This will be the case.
Section 4.6	The final sentence, 'The ODA is assuming an overview role to ensure the background schemes will deliver the required outputs to the Games and will not pose a budget or programme risk to the delivery of transport for the Games' overstates the ODA's role. We would prefer to see this described as: 'The ODA is assuming a watching brief over the background schemes to ensure they will deliver the required outputs upon which the specific additional Games transport schemes will rest.'	Noted.
Table 4.1	East London Transit will be implemented by 2009, not the 2010 stated. Greenwich Waterfront Transit will be implemented in 2011, not the 2010 stated. Both should be described as 'subject to planning permission'.	Noted.
Table 4.2	<b>SEA objectives</b> Minimising the increase in CO <sub>2</sub> emissions: Agree there will be minimal increases with this scope, but the potential for incorporating beneficial measures still exists.	Noted.
Table 4.2	To help maintain compliance with the National Air Quality Standards: As above.	Noted.

<b>Document reference</b>	<b>Comment</b>	<b>ODA response</b>
Table 4.2	Ensure existing levels of annoyance from noise caused by traffic do not significantly increase: Need to ensure no new congestion hotspots around residential areas next to Games venues.	Noted.

### **Comments from Gravesham Borough Council**

<b>Document reference</b>	<b>Comment</b>	<b>ODA response</b>
General	More detailed look at Ebbsfleet proposals required as although covered by existing permissions, it may not be being used in a way that was ever assessed and there may be additional temporary facilities that need to be covered.	The Transport Plan does not indicate that this is the case, but this will be examined. It seems unlikely that any additional significant environmental effects will be identified at a strategic level in relation to this.

### **Comments from High Speed 1 (Formerly CTRL (UK) Ltd)**

<b>Document reference</b>	<b>Comment</b>	<b>ODA response</b>
General	CTRL (UK) Ltd would wish to carry out detailed assessment of environmental effects in scheme planning applications.	Noted.

### **Comments from the City of Westminster**

<b>Document reference</b>	<b>Comment</b>	<b>ODA response</b>
Executive Summary, Para 9.	The SEA objectives do not appear to consider impacts or issues dealing with population. Population and human health are one of the nine topic areas specified in the UK SEA Regulations. There does not appear to be a specific reason why population should be omitted.	The SEA objectives include compliance with the National Air Quality Standards and ensuring existing levels of annoyance from noise do not significantly increase. These are both primarily human health issues. The scoping exercise, where the statutory environmental bodies were consulted, did not identify any other specific impacts on population on human health that needed to be considered in the SEA.

<b>Document reference</b>	<b>Comment</b>	<b>ODA response</b>
Para 1.1	The Council encourages and supports extending the scope of the SEA in future to incorporate a sustainability appraisal.	Noted.
Para 3.26	The transport strategy objectives do not seem to be compatible with the objectives set out in the Transport Plan.	The overall transport strategy describes how the transport for the Games will be delivered. The transport objectives are what will ultimately be achieved as part of the strategy.
Table 2.3	This is not easy to interpret and the information provided would seem to be somewhat optimistic. For example, how is objective 1 compatible with avoiding air pollution or avoiding damage to biodiversity? The same question applies for transport objective 2.	The format of the compatibility matrix is that provided in Government guidance on SEA (See ODPM et al (2005) – 'A Practical Guide to the Strategic Environmental Assessment Directive' – Appendix 5, Fig.12). The judgment was that these objectives are compatible, as it was not possible to identify ways in which they were not compatible.
Para 3.1	Undertaking Environmental Impact Assessment (EIA) for schemes included in the Transport Plan will not take account of cumulative effects in the same way as the SEA should. This needs to be reflected in the Environmental Report.	Noted. The Post-Adoption Statement will refer specifically to this.
Para 3.2	Environmental baseline makes no reference to population, but this surely is an issue that should be considered bearing in mind the number of receptors that could be potentially affected by the implementation of the Transport Plan?	The environmental effects of implementing the plan do have a wide geographical scope. However, as no significant adverse impacts arising from the implementation of the plan were identified, particularly in respect of impacts that affect people such as air pollution and noise, it is not considered that additional data on population would add any great insights to the analysis.
Para 3.20	Should 'Humble Bumble' actually read the 'humble bumble bee'?	This was how the species was referred to in the source documents used to compile the baseline section.
Para 3.57-3.59	Clarification with regard to the status of the Serpentine is sought and consideration given as to whether it should be included in this section of the Environmental Report.	Noted. This will be considered in the Post-Adoption Statement.
Table 4.2	A number of judgements and assumptions have been made here, but there is no explanation or justification relating to these. Inclusion of the reasoning and justification would assist in understanding how certain conclusions have been reached.	Table 4.2 is essentially a summary comparison of the information presented in chapter 5 of the Environmental Report ('with the transport plan' and chapter 3 'without the transport plan'). The overall conclusion to be drawn from this table is that without implementation of the Transport Plan, the environmental effects of travel generated by the Games would be greater than they will be with the Transport Plan in place.

<b>Document reference</b>	<b>Comment</b>	<b>ODA response</b>
Table 5.2	The sub-objective on greenhouse gas is assessed to have a minor temporary beneficial effect. This would appear unrealistic as public transport emissions contribute to greenhouse gas pollutants, as will the transport requirements of the 'Games Family'. It is therefore not entirely clear how this conclusion has been reached.	The basis of this assessment is that with the Transport Plan in place, the overall level of greenhouse gas emissions would be lower than compared with a 'without the Transport Plan' baseline. Without the Transport Plan, fewer members of the Games Family and spectators would use public transport to travel to the Games venues, and more traffic would be generated. This would lead to a higher level of greenhouse gas emissions overall. Therefore the effect of implementing the plan is assessed to be a minor, temporary beneficial effect in this respect.
Para 5.8	Applying the experiences of Sydney 2000 to London does not seem like a fair comparison. It is considered that it would be more appropriate to draw on the experience of a range of cities that have hosted the Olympics to gain a more balanced view associated with background demand.	Noted. Assessments for the SEA were based on the analyses of transport effects undertaken and provided by the ODA. The reference to the Sydney experience was based on indications from the ODA as the basis of analysis to date.
Para 6.7	The statement 'it is hoped that public transport will become the preferred choice for more people travelling to London and to events' seems a weak and strange strategic aspiration for such a major issue, particularly as the rest of the Environmental Report and the Transport Plan places such high emphasis on the use of public transport.	Noted. This, as indicated, is quoted from the ODA's draft 'Sustainability Principles' document published in August 2006. The Post-Adoption Statement will report on any update to these since that time.
Para 6.13	The variety of measures that will be introduced to manage background demand could themselves have environmental impacts, which have not been included as part of the assessment, as they are not known at this stage. It is also considered inappropriate to state that they are included in the Transport Plan to manage the extent and magnitude of environmental effects. The primary purpose of these measures is to transport the Games Family between the venues and destinations efficiently. If environmental effects are minimised as a result this is a secondary benefit.	It was considered that none of the measures listed in para. 6.13 were likely to lead to any significant adverse impacts on the environment. For most of these measures, it is also the case that their environmental benefits were an important consideration for their inclusion in the Transport Plan, and therefore the reference to them here is important to indicate the way in which environmental considerations influenced the content of the Transport Plan.
Para 8.4	This would have been better placed at the beginning of the report.	Noted.

### Comments from the Lee Valley Regional Park Authority

Document reference	Comment	ODA response
Para 1.10	The Authority would wish to see this SEA process consider the environmental effects of the future stages of the Transport Plan and other related strategies and proposals as their details are developed.	The regulations governing SEA state that the process applies to all except 'minor modifications' to the Transport Plan, and the ODA will comply with this statutory requirement.
Para 5.15	The Authority is concerned that the environmental impacts on biodiversity in relation to Hackney Marsh and the use of the marshes as a temporary transport mall are monitored from the outset so that any adverse impacts can be identified and mitigated.	As indicated in Table 7.1, it is anticipated that this would be monitored through the ongoing work in the Hackney Biodiversity Action Plan.

### Comments from the Environment Agency

The comments received from the Environment Agency all relate specifically to the Transport Plan rather than the Environment Report specifically. The generic checklist on environmental issues in Transport Plans that was also forwarded had been sent to the ODA by the Agency as formal comments on the Scoping Report prior to the publication of the Environment Report, and had already been taken into account.

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