

## 1. General comments

- 1.1 I welcome the attempts of the ODA to respond positively to the strategic planning policies and objectives set out in the London Plan and its supporting documentation. I also recognise that many aspects of the proposals as submitted are in outline, or will come forward later as detailed design evolves.
- 1.2 However, there is a general concern that the nature of the submissions does not allow for significant aspects of the proposals to be fully understood and assessed against Mayoral strategies, in particular the Mayor's statutory London Plan. I would therefore urge that the additional information identified in this letter is provided in the near future, so that these matters can be clarified and addressed.
- 1.3 Where this proves not possible, then robust mechanisms should be proposed and agreed as soon as possible, so that when the applications are referred back to the Mayor for formal direction, the GLA and TfL can be satisfied that Mayoral policy objectives will be secured throughout the site preparation stage, the Games themselves, and in legacy mode.
- 1.4 I would also be particularly concerned to ensure that decisions are not taken at this stage, which would prejudice or constrain the proper planning of legacy facilities and land uses.
- 1.5 Finally, it is understood that the ODA are preparing a number of additional technical documents (for example on water, biodiversity, equalities and procurement). I would ask that these are completed and submitted as soon as possible, as they may help bring together material and detail that is currently omitted from, or dispersed across the a range of submitted documentation, and their submission may well clarify important commitments and interrelationships.
- 1.6 My detailed comments are as follows.

## 2. Air quality

- 2.1 The air quality assessment presented in Chapter 17 of the Environmental Statement uses appropriate methodology and data assessment of the development and its issues and modelling has been undertaken of a number of scenarios for various years including construction phase, operation phase and legacy operational phase. The modelling has taken into account transport emissions during construction, transport emissions during operations and stationary source emissions during operation. However all are assessed individually and no combined analysis has been undertaken and a significance test should be applied to combined emission results.
- 2.2 The development itself has been assessed to result in mainly negligible air quality impacts with some receptors suffering minor adverse or minor beneficial results. It should however be recognised that the development is in an area that already exceeds air quality limits, and hence could have a detrimental impact upon future residents and site users. The air quality assessment does not provide any details on what this exposure is likely to be and potential mitigation to reduce exposure. Further information on exposure and mitigation should therefore be provided, particularly in relation to PM10 emissions.
- 2.3 The Transport Assessment considers sustainable modal splits, but does not mention alternative fuelled vehicles. Such options should be assessed and promoted within the project.
- 2.4 The transport flows used for air quality modelling purposes are only shown as total flows, and there is no further information on assumed modal split or fuel types. Opportunities for encouragement and implementation of low carbon transport policy should be incorporated into the transport assessment.

- 2.5 The submission states that the emissions from the proposed biomass boilers are insignificant because they do not require a permit to operate. However, this does not necessarily mean there will be no localised impacts, and the air quality impact of the biomass boilers should be modelled and reported back to the GLA.
- 2.6 Nearby industrial processes have not been included in the air quality modelling. The report assesses that the strict regulation of the process would have no significant affect on local air quality. However, this requires further justification, and information on any history for these processes in terms of complaints or enforcement issues should be presented to understand and mitigate any potential conflicts.
- 2.7 The submission concludes that the impacts of the proposed developments on greenhouse gas emissions will be extremely small, and given their negligible impact do not require to be quantified. Within the draft alterations to the London Plan (London Plan Further Alterations Consultation document) the Mayor has set out his commitment to reducing greenhouse gas emissions and minimising emissions from new developments. It is therefore recommended that further consideration be given to modelling the greenhouse gas emissions associated with this development.

### **3. Biodiversity**

- 3.1 There is no clear quantification (or qualitative) assessment of biodiversity habitats that will be provided at legacy, and there is therefore a risk that the applications may not provide adequate replacement or a net increase for biodiversity. The approach to mitigation and compensation may therefore be contrary to PPS9.
- 3.2 A total of 45 ha of land designated as Sites of Importance for Nature Conservation will be lost should the proposals proceed. Most of this is wasteland, some of which is important for nationally rare invertebrates, including UK Biodiversity Action Plan priority species. The most extensive areas of this habitat are at Stratford Marsh and the Eastway Cycle Track. A total of 13 ha of existing habitats will be retained and apparently enhanced as refugia to maintain species throughout the development process. However, these are all in small fragments, and their success as refugia is likely to depend on the provision of temporary habitat during the development process. Whilst this is stated as an objective, no specific proposals are included in the application. More information is therefore required on the provision of temporary habitats.
- 3.3 The new habitats will be largely wetlands and grassland, and thus the legacy habitat composition will be different from the baseline. There is likely to be an increase in wetland and a decrease in wasteland. It is therefore difficult to evaluate the overall balance of losses and gains, other than in terms of total area, and compared with the 2004 planning permissions, there is considerably less wildlife habitat, in particular in respect of proposed river enhancements.
- 3.4 A single summary table that provides information on the overall ecological impacts of development on each development zone is requested, (combining tables 16.12-16.19) to show all overall net effects.
- 3.5 A clearer definition of the terms "Habitat" and "Semi-Natural Habitats", as used in the ecology chapter of the ES is requested.
- 3.6 There needs to be a greater commitment to identifying impacts and opportunities beyond the sites red line boundary and at legacy stage.

- 3.7 There is a need to ensure that there is no increase in 'Areas of Deficiency in Access to Nature'. The model used to map deficiency in access to nature (ES paragraph 9.18.13) is not consistent with that defined in the Mayor's Biodiversity Strategy and promoted by the London Plan (policy 3D.12). There are initial losses of access to areas of nature and these temporary increases in AOD are unavoidable. What is not clear in the application is whether these temporary increases will be fully reversed in legacy. Crucial to this is that the Greenway is restored to a state where it provides a good experience of semi-natural habitats. Another area where increases in AOD will need to be fully reversed is the northeastern entrance to the site.
- 3.8 The overall affect the proposed ground levels will have on providing natural habitats, particularly in relation to river habitats requires further clarification and discussion.
- 3.9 Because it is impossible to evaluate the overall losses and gains of habitat other than in terms of total area, to comply with Mayoral policy there should be no net loss of semi-natural habitat, and preferably an increase. A commitment to a minimum total area of semi-natural habitat in the park at legacy, to ensure an overall gain, should be agreed and secured by condition
- 3.10 The loss of wasteland habitats is a particular concern. The previous Masterplan included considerable areas of "stony meadows", within the landscaping of the park. A commitment to a minimum area of "stony meadows" in the park should be agreed and secured by condition.

#### **4. Bridges**

- 4.1 Further clarification and justification is required on the proposed removal of bridges at the western boundary of the site for legacy phase - for example the bridge (T08) which would connect Hackney Wick station to the proposed employment use (legacy International Broadcast Centre - IBC) and bridges on Fish Island. Retention of these connections would increase accessibility of MUSV and legacy use IBC from Hackney Wick station.
- 4.2 The proposals include a large number of new bridges over waterways. These bridges need to be designed in a way that does not restrict navigational use of the waterways, and therefore need to be assessed for navigational clearances before and after the Games to ensure maximum use of the waterways and be designed to minimise any adverse effects on biodiversity. Particular consideration needs to be paid to the future range of water levels if/when the Prescott Lock is constructed. In addition, consideration will be needed as to how the long term maintenance and repair of such a large number of bridges will be undertaken.
- 4.2 City Mill River - Wide bridges H04 (which is 25m wide) and F11 (50m), are proposed over City Mill River. Wide rivers can have a damaging effect on waterway amenity and biodiversity. It is acknowledged that the Legacy phase will dismount parts of these bridges, but additional information is required to confirm and assess these aspects of the proposals.
- 4.3 It is not clear what is proposed by the applications for greenway connections across the A11 Stratford High Street. The 2004 application noted, "the key to the area's long term success rest in overcoming the fragmentation and severance caused by the waterways and other infrastructure" and that "the Olympic Games will provide a legacy of major pedestrian facilities within the masterplan area. These include the four land bridges at Temple Mills, Carpenters Road and the Greenway". There are therefore significant concerns that a temporary bridge, which provided an at-grade pedestrian crossing, would not provide a major legacy facility envisaged in the 2004 scheme and still thought essential to facilitate access and integration in legacy mode. Urgent clarification of this point is therefore requested

## 5. Climate change

- 5.1 Meteorological data is only assessed until 1997, however, in terms of climate change it is likely that average temperatures in future years could now be higher. Consideration should therefore be given to using more up to date meteorological data and adopting a methodology, which would incorporate data from the London Atmospheric Emissions Inventory into the model.
- 5.2 The planning application has not considered the increasing need for summer cooling under climate change. The design of facilities – particularly the IBC under legacy use should be designed to remain cool in hot weather.

## 6. Drainage

- 6.1 Some peripheral areas of drainage propose to connect to the Combined Sewer. This should be clarified and minimised in particular in PDZ's 8 & 11.
- 6.2 There are concerns about the intention to remove some sustainable drainage systems at Games and legacy stages that need further clarification, and further information is needed (particularly in PDZ's 9,10,13,14) to demonstrate maximum use of sustainable drainage prior to discharge.
- 6.3 The 2004 planning permission included the provision of several attenuation ponds, which have been removed in the current application. This is a significant change and requires further discussion and clarification.

## 7. Energy

- 7.1 The energy statement commits to a 15% "aspiration to achieve" improvement on energy efficiency over current building regs during the detailed design stage. However, this is not quantified and requires further dialogue and clarification.
- 7.2 The submission refers to "testing the feasibility" of providing renewable energy sources within permanent venues and buildings as part of the ODA's 20% renewable energy commitment. As currently expressed this is not acceptable and requires further clarification and commitment.
- 7.3 Page 12 - section 2.1.2 - Key drivers for the energy strategy needs to address energy saving or emissions reduction.
- 7.4 Page 46 - the reduction against building regs has become "around" 15%, and remains unquantified in table 7 on pages 47 and 48. This requires further dialogue and clarification.
- 7.5 Page 80 - section 8.1.1 - objectives for renewable energy strategy - should identify opportunities to maximise contribution from on-site renewables.
- 7.6 The inclusion of biomass boilers in measuring energy emissions has not been included and as set out in para 2.5, the biomass boiler has the potential to have emissions with differing characteristics to gas fired boilers and these emissions need to be properly assessed.
- 7.7 The energy emissions assessment makes a commitment to sensitive and appropriate sites for temporary diesel generators for use throughout the site. Currently no information on numbers and sites are known so these cannot be modelled. These could become a significant localised source of particulate matter and further information on their impact should be provided.
- 7.8 The only stationary source modelled is the energy centre. The potential for individual building emissions or other small-scale emissions have not been taken into account. Any further potential building emissions should be identified and assessed.

- 7.9 Whilst there is a commitment to providing up to 20% of the development's heat and electricity from renewable sources, the proposal should commit to providing at least 20% from these sources (which could include district wide facilities at Stratford City and Kings Yard).

## **8. Flood risk**

- 8.1 Some of the diagrams used in the Flood Risk Assessment make the future flood depths impossible to assess. This is a particular concern for some of the areas alongside the River Lea upstream of Carpenters Road, and these diagrams should be re-drawn or clarified.
- 8.2 By bringing forward detailed design on separate development sites could limit the effectiveness of flood risk management measures, and discussion on how this can be avoided is requested.
- 8.3 The proposal for a 9m high sheet piled wall alongside the stadium is very expensive and will prevent designers from considering 'softer' flood management options – for example flood storage as exemplified by the Tsurumi stadium in Tokyo. This should be discussed and clarified.
- 8.4 There does not appear to be any information on flood warning or emergency procedures. Given that large areas of publicly accessible land will have some degree of flood risk, possibly to depths of several metres, these aspects need to be considered at this stage. The location of emergency control centres in particular needs to consider flood risk.

## **9. Housing**

- 9.1 The new housing should be designed so it can be adapted to meet local and London wide housing needs and I would wish to be satisfied that the design and detail of the units will provide lasting and high quality homes. This will require discussions on the means that are proposed to convert the temporary Olympic housing into permanent homes in legacy and beyond, and the standards and mechanisms that are proposed.
- 9.2 All homes should be built to lifetime home standards and given the need to provide wheelchair accessible accommodation for the Paralympic athletes with disabilities there is the opportunity to provide wheelchair accessible homes beyond the 10% minimum standards in the London Plan.
- 9.3 The scheme as currently depicted may not provide a satisfactory standard of accommodation for future occupiers, (in particular for families) and further information is required in terms of environmental impacts, particularly in terms of sunlight & daylight, shadowing and wind.
- 9.4 The means to secure the Mayor's minimum 50% affordable housing target needs to be clarified in line with London Plan policy and should be designed to provide higher proportions of family housing, in line with the Mayor's Housing SPG and Lower Lea Valley Opportunity Area Planning Framework.

## **10. International broadcast centre**

- 10.1 The legacy use of the IBC for employment is welcomed, however, further information is required on the mix of uses proposed. While some B1(a) uses may be acceptable, this should not be the predominant use. Clarification is therefore sought as to safeguards to ensure that a substantial proportion of this site (which is part of a Strategic Employment Location in the London Plan) is provided and marketed for non-B1a uses (including logistics and creative industries).
- 10.2 The design of the buildings should be conditioned to ensure a wide range of appropriate legacy uses. For example, the IBC should be accessible in legacy phase for logistics and industrial uses with appropriate access, floor-loading, ceiling heights, road widths and space for turning circles.

- 10.3 The intended use of land to the south east of the IBC in legacy should be confirmed as no land use is shown in drawing OLY-OLF-APP-DWG-PDZ5-VEN-PAR-002 (drawing for approval), but it is shown as playing fields in other documents.

## 11. Noise

- 11.1 The proposed wind turbine in the north of the site (Eton Manor Sports Ground) will be the first such installation in this part of London and, as a large and highly visible addition, it is important that it is designed to have the lowest possible noise impact. It should be possible to ensure that no unacceptable impacts arise, but little information has been provided other than a typical sound power level (100 LWA) for such devices in Table 18.83 of the ES.
- 11.2 Based on this sound power level, the turbine should not give rise to complaints from the nearest residents when operating during the daytime, but to ensure that there is no possibility of complaints at night, it may be necessary to specify a slightly lower sound power level than the typical value quoted. This should be achievable and a more detailed assessment of turbine noise should be undertaken, taking into account nighttime operation and the potential tonality of the noise, in order to draw up an appropriate specification for the turbine.
- 11.3 Additional soundscape analysis should be provided and there should be agreement on the extent to which basic noise mapping (e.g. limiting exposure to traffic noise from A12) could be extended to more qualitative soundscape design (e.g. taking account of features of positive soundscape interest).
- 11.4 An assessment of the impacts of both fixed wing and helicopter noise on the Olympics and Legacy venues and legacy platforms should be undertaken (including consideration of tonality, L<sub>max</sub>, SEL or other similar indicators of event impacts - not just Leq contours), as this part of the Lee Valley is overflowed by aircraft departing from London City Airport on westerly operations, and is to some extent a helicopter route. The area also sits beneath a point where aircraft held in both the north London stacks for Heathrow turn west through about 300 degrees on to the final approach path to the airport, at short intervals under prevailing (westerly winds) conditions. These are at a relatively low level, with the London City aircraft turning to the east below them.

## 12. Open space

- 12.1 It is unclear what will be delivered in the legacy phase, in particular the quality and facilities of the open space and whether arrangements will include provision for the ongoing management and maintenance of the parkland.
- 12.2 The application refers to providing 110ha of improved open space. This seems to be a large reduction of what was proposed in the 2004 consent. Clarification of the quantity of open space proposed and the relationship between current proposals for 110ha and the 250ha originally discussed is requested.
- 12.3 I have concerns over how the creation of new public open space network that extends the Lee Valley Regional Park down to the Thames will be achieved in legacy. This will be a key benefit for Londoners and should be at the heart of the proposal. A clearer vision and statement about the new park and open space network through the wider area should be provided showing where it is to be provided, what it would contain, and how it would be managed and maintained.
- 12.4 There needs to be additional detail provided on the extent of lost and potential new Metropolitan Open Land, for example; how this will be achieved, where it might be, and the amount proposed.
- 12.5 Connections to and from the park for local residents need to be made explicit and assured.

- 12.6 The assessment of greenspace provision 'per 1000 population' relate to the application site only, and take no account of the contribution made by the greenspace in the site to the surrounding area. The assessment should include the whole catchment of the greenspace.
- 12.7 The residential proposals should be assessed carefully against the requirements of Policy 3DIIi of the FALP and the Mayor's Draft SPG "Providing for Children and Young People's Play and Informal Recreation".

### **13. Parking**

- 13.1 The proposals include a 1,300 space car park north of the International Broadcast Centre. While there would normally be concerns over this level of car parking, it is recognised that there will be short term requirements arising from the Games themselves. However concerns are raised over the continued use of the car park in the legacy phase of the application and the proposals for employment use of the IBC in legacy phase would only require 130-220 car parking spaces. Clarification is therefore sought regarding reduction in capacity, or alternative use of the car park site in legacy phase.
- 13.2 An area to west of Pudding Mill Lane DLR station is proposed as car parking in legacy phase (after use as warm up area in Olympics phase). This land should be returned to industrial/employment use consistent with its London Plan Strategic Employment Site designation. Confirmation is therefore sought that this site will be returned to employment use and not used as car park in the legacy phase
- 13.3 If predicted parking demand for sporting events or concerts exceeds supply this should be managed through an Event Parking Management Plan, which would form an integral part of the Travel Plan framework, not by seeking to meet demand through oversupply of car parking.
- 13.4 Specifically, TfL expects that a policy of parking restraint consistent with the London Plan will be applied to all land uses. In particular the concept of the Olympics Park being accessed primarily by sustainable modes should be extended from the Games themselves to the Legacy. TfL has particular concerns about the assessment of parking demand for a number of the venues, which doesn't recognise the importance of managing demand and all retained venues should have limited parking to meet operational needs only which could be provided on site or in a shared parking facility.
- 13.5 The proposal to retain the IBC multi storey car park providing 1300 'overspill' spaces would not be supported unless parking at the individual venues were significantly reduced and the retention of this car park needs to be clearly justified with reference to standards for the employment uses, which will occupy the IBC in Legacy. Its use by visitors to events at the surrounding venues may need to be restricted to avoid unacceptable traffic congestion on surrounding roads.
- 13.6 0.7 parking spaces per residential unit are proposed for the residential component. Although this is consistent with Stratford City and is within maximum standards in the London Plan, TfL believes that is scope for further reductions in parking and parts of the development could be designed as largely car free with parking restricted to disabled residents/visitors and spaces for car club vehicles.

### **14. Rivers and waterways**

- 14.1 Proposals should seek to mitigate/compensate water quality in the areas near to Abbey Mills Sewage Outfall.

- 14.2 Proposals for the Waterworks River need to take account of future water levels should the Prescott Lock proposals come forward, and water levels must not inhibit the ability to use the river for navigation. This will particularly effect water depths and bridge clearances. The west bank of the Waterworks River is remaining broadly in its current state. There is therefore little in the way of enhancement offered. Of particular concern is that part of the towpath toward the northern end of this river will be lowered leaving the towpath approx 1.75m below the river wall. This is unlikely to be a positive design aspect and does not appear to be justified.
- 14.3 The East bank of the Waterworks River involves demolishing a steel sheet piled river wall and rebuilding it 8m back from the river. This is an expensive proposal, which is unlikely to result in a sympathetic river corridor design. This should be re-examined with a view to creating a more natural riverbank at lower overall cost
- 14.4 There are locations south of the Planning Application boundary where improvements could be made to reduce the vertical drop from towpath into river and to improve towpath links, for example; the lack of a towpath under the A11 immediately east of the A12 junction.
- 14.5 Document 13A contains a number of errors in relation to the waterways network:
- Para 4.9.1 refers to transporting water, presumably this means transport by water
  - Para 4.9.2 refers to Navigation to Luton, which is not possible.
  - Para 4.9.2 refers to Bow Creek being only navigable at certain times of year, whereas it is actually navigable all through the year but only at certain states of the tide.
  - Figure 4.7 appears to be missing.
- 14.6 The proposals do not deliver the scale of improvements to the river corridors that was anticipated within the 2004 consent. There are some areas where a canyon effect will be created alongside rivers. Rivers and their towpaths will be surrounded by slopes and embankments of up to 9 metres either vertical or steeply sloped. This could create a windy, shaded environment not conducive to amenity or biodiversity. In particular the west bank of City Mill River and the south bank of Old River Lee are shown with vertical sheet piled river walls of up to 9m. This would seem to been specified to enable a free hand for the stadium design.
- 14.7 This is fundamentally the wrong approach and may result in higher than necessary costs. The approach to be taken should set out a preferred but reasonable river treatment as a fix for the stadium design and only in an exceptional case should this then be re-visited to build such an unsustainable river wall. The proposals should envisage building the river walls in such a way that they do not need to be further rebuilt for the Legacy, as this is additional avoidable expenditure.
- 14.8 The 2004 consent envisaged comprehensive restoration of river channels, which have been substantially scaled down.
- 14.9 The Main Olympic Stadium is proposed over the top of Pudding Mill River and it is therefore proposed to fill in this river. The 2004 consent provided (in Legacy Phase) for the re-establishment of this river from the Old River Lee in the North through to the Bow Back River in the south (a connection that has been progressively and unsustainably lost over previous decades). The current planning application does not appear to provide for this to be re-established. This is therefore contrary to London Plan Policy 4C.3 and is not mitigated. The Legacy transformation proposals should include the re-establishment of this river channel as set out in the 2004 permission. The Environmental Assessment is questionable in volume 12D in which it concludes that infilling of this river is a minor adverse impact.
- 14.10 The East bank of the City Mill River appears substantially unchanged, but leaves in place a concrete/sheet piled wall of approx 2.5 m drop from bank to water/soft mud. This is not an enhancement and represents a missed opportunity to make the river a more natural, safe and of higher amenity value.

- 14.11 Old River Lee will undergo substantial engineering works one such element being the construction of a new wall set back 4m from the current river edge and rising to a height of 7m from the water level. This canyon effect will be further exacerbated by the fact that the Main Stadium is close to the edge of the river wall. Subject to flood risk considerations it may be possible to narrow the river corridor and thereby create a more gently sloping bank of much more sympathetic design whilst retaining the overall flood capacity.
- 14.12 The removal of Channelsea River (northern section - Hennikers Ditch) is regrettable especially given that it runs through the Bully Point nature reserve. This is contrary to London Plan Policy 4C.3 and requires further dialogue.

## 15. Services and utilities

- 15.1 The area has a number of infrastructure service crossings over rivers carrying water and sewerage pipes and electricity cables. Many of these are in an extremely poor state of repair and some may be redundant. These structures add considerably to the feeling of dereliction and poor environment, but there is no clear reference to their repair or maintenance. Some structures may offer the potential for public art, which the ODA could promote in partnership with the structure owners
- 15.2 The Government is currently considering the need to invest in major new sewerage infrastructure in the vicinity of the Olympics. In particular a proposed new sewer overflow tunnel from Wick Lane to Abbey Mills Pumping Station and a major 7.2m diameter combined sewer transfer tunnel from Abbey Mills to Beckton. Whilst the decision is not yet known, the proposals should be capable of accommodating these works during the general Olympics construction phase (and beyond) if approved.

## 16. Equality, Diversity and Social Inclusion

- 16.1 The applications need to demonstrate a commitment to equality and diversity as set out in the London Plan, the Mayor's Planning for Equality and Diversity draft SPG<sup>1</sup> and the ODA's Equality and diversity strategy<sup>2</sup>. This would apply to:
- What the ODA builds, provides and leaves behind (i.e. the venues and facilities created and the transport provided, both for the Games and the legacy)
  - How the ODA goes about building and providing (i.e. the processes by which those facilities, venues and transport are created)
  - Who does the building (i.e. the diversity of people and businesses taking up business and employment opportunities on Games projects), and
  - Whom the ODA involves (i.e. the diversity of the people the ODA listens to in deciding what it does, how it does it and determining the design of what it creates).
- 16.2 The applications need to clearly set out these principles along with ODA procurement policy commitments to a diverse supplier and contractor base to form a robust framework for actions and delivery.
- 16.3 In order to address gender equality issues in a satisfactory and systematic way each proposal should go through a full Equality Impact Assessment process that addresses all equality strands (i.e. race, gender, disability, sexual orientation, age and faith), in particular addressing the following matters:

### Procurement process

- Is the need to promote gender equality appropriately reflected in procurement processes?

<sup>1</sup> Planning for Equality and Diversity in London, London Plan Draft Supplementary Planning Guidance, December 2006

<sup>2</sup> ODA Equality and Diversity Strategy, December 2006

Profile, policies and working practices of suppliers and sub-contractors

- What is their profile in terms of gender representation at all levels of the organisation?
- Do they have an equality / gender equality policy? What evidence exists to demonstrate its implementation?
- Consultation should be carried out with relevant women's and community sector groups in order to ensure that all sectors of the community benefit in terms of the Olympics legacy

Development of infrastructure and facilities should ensure the following considerations are fully incorporated and addressed:

- Women's safety
- Planning for diverse activities, including promoting women's participation in sports, environmental, community and leisure activities
- Appropriate toilet facilities for women, men, disabled people; baby-changing facilities etc
- Accessible venues and facilities encouraging and promoting participation from all sections of the community
- Facilities for people with children

- 16.4 The applications also need to demonstrate how they will help meet the employment and training needs of London's diverse population including its women, BAME groups, disabled people, LGBT people and other marginalised groups such as travellers and gypsies, refugees and asylum seekers, lone parents, people leaving care, ex-offenders, alcohol and drugs users. The applications should also demonstrate attention to all age groups, especially older people.
- 16.5 The applications should demonstrate inclusive and safe access to all venues and parts of the Olympic Park and that the proposed facilities will be affordable for local and disadvantaged groups, both during and after the Games. The proposals should also demonstrate how they will promote and improve public health.
- 16.6 Evidence of an Equality Impact Assessment having been conducted and the use of and application of the approach set out in the Mayors draft Supplementary Planning Guidance, Planning for Equality and Diversity (Dec 06) and an would provide confidence that equality and diversity have been properly implemented into the applications.
- 16.7 Consultation and two way engagement with London wide and local communities should be real and are ongoing, and the concerns raised explicitly addressed in the planning process and documents.
- 16.8 The extent that new permanent community facilities are being proposed should be made explicit, as should their connectivity with Stratford City. This should include community centres, childcare centres, shops, day centres, health facilities, education facilities, places of worship (for diverse faiths), youth facilities, post offices, and laundrettes.

## **17. Sustainability**

- 17.1 The proposals do not reflect the Mayor's Waste Strategy in particular the Mayor's waste hierarchy that places new and emerging recovery technologies above conventional incineration on the grounds of efficiency and flexibility. There is also a lack of detail in the application to clarify and test sustainability proposals, such as the lack of reference to the planned Low Emission Zone and Zero Emission Zone, outlined in the Transport Strategy, or any air quality reference in the energy section.
- 17.2 The Olympics Park and proposed developments within it need to achieve specific explicit and assured sustainable design and construction standards together with robust monitoring commitments.

- 17.3 There is a need to provide evidence of thorough consultation with disabled persons.
- 17.4 Significant changes to Policy 4A.6 (improving air quality) in the London Plan have been made in FALP to promote sustainable construction. The applications do not pay due regard to this policy approach.

## 18. Transport

- 18.1 TfL is awaiting further information from the consultants before it is able to fully assess the impact on the Transport for London and Strategic Road Networks. The assessment will need to take into account the cumulative effects of the Stratford City, Olympics Park and Olympics Village applications. Issues to resolve include:
- Details regarding modelling assessment, forecasting and validation that have been raised with the applicant's consultants in relation to the main Olympics Park application;
  - The allowance that has been made for committed developments along Stratford High Street;
  - Sources of assumptions made about trip generation and a justification for the assumed high level of vehicular traffic generated by the existing estate, which is only partially occupied.
  - Measures to assist movement by public transport, pedestrians or cyclists including bus priority measures may be required as mitigation for highways impacts.
- 18.2 The TA creates concerns, in that the predictions of traffic density indicate that the area is likely to suffer increasing levels of congestion and junction saturation during the Games and also more worryingly, in legacy as the transition into permanent development occurs. The impact on safety of junction saturation is disproportionately large for cyclists and walkers. During construction the impact on junction capacity is of particular concern as the percentage of HGVs in the traffic flow will be higher than normal. A detailed audit will be required for identified junctions taking into account the impact on vulnerable users.
- 18.3 A robust travel plan for the Olympic Sites needs to be prepared. At the outset commitments need to be made (as part of a Construction Management Plan) setting minimum targets for the movement of material and workers by sustainable modes of transport. A comprehensive travel plan will seek methods and initiatives to link all of the Olympic Sites and the four stages of development. This will be subject to reviews and updates, but a framework document including firm commitments, targets and timescales needs to be agreed as part of the current permission. TfL supports the intention to set up a Travel Plan Group to oversee the development of this plan. To do so a robust framework needs to be in place before permission is granted to provide certainty to decision makers.
- 18.4 The planning application envisages a direct link from the proposed West Ham ramp into the existing station overbridge between the Jubilee and District Line platforms. The new western ticket hall which LU had understood to be an Olympic deliverable does not form part of the application. Assuming that engineering constraints can be overcome this would result in the creation of a new ungated access into the station, which is unlikely to be acceptable to TfL. The application should demonstrate how a western ticket hall can be brought forward through the planning process as envisaged in the Olympic Transport Plan and how the proposed ramp would link into this ticket hall.
- 18.5 There are a number of factual inaccuracies and points of clarification, which DLR will be raising with the consultants, however there are four principal issues identified at this stage:
- The crowding section (specifically 3.9.33) does not appear to consider demand involving visits to the site by people holding non-event tickets.

- The scope of the crowding analysis should be expanded to include Canning Town station due to the important role that this interchange will provide linking sites such as ExCel and Greenwich with the main Olympics Park sites.
  - The effects of trips from the venues on the operation of Pudding Mill Lane station in the Legacy phase should be considered due to its low capacity.
  - There may be potential conflicts between the plans to accommodate Crossrail in this area and the use of Pudding Mill Lane as a route in and out of the Olympics Park.
- 18.6 TfL would wish to work closely with the ODA and the boroughs to agree suitable mitigation proposals to address identified transport impacts. There needs to be a clear commitment from the ODA and funding identified to address issues related to the Olympics Park and Olympics Village planning applications. Unless the ODA has control over the delivery of mitigation works associated with the Stratford City Development, the impacts of potential delays to such works (due to changes in market conditions etc) should be considered and suitable contingency plans developed. This should be addressed in the Transport Assessment.
- 18.7 TfL will expect contributions to provide for the additional costs of rerouting bus services both in and out of service during the construction, Games and transformation phases as well as pump prime funding for the introduction of new bus services during the Games and legacy. 'The TA suggests that access across the Olympic site, including to Stratford City, will remain restricted for a significant period after the Games. TfL would expect that bus access be provided as soon as possible after the Games to ensure that legacy benefits are maximised. TfL will want to discuss further the details of bus service rerouteings and enhancements.
- 18.8 TfL will also expect bus priority measures to be implemented as mitigation for identified highway impacts. These commitments need to be secured as part of the main Olympics Park and Olympics Village planning applications.
- 18.9 Adequate provision needs to be made at points of demand through taxi ranks/set down areas and access routes for taxis will need to be maintained during all phases.
- 18.10 Security fencing may prevent use of the towpaths and canals/rivers during the construction and Games and mitigation measures should be made explicit.
- 18.11 The transport assessment should provide further details on its ability to implement Policy 4A.6 of the London Plan and seek to reduce the environmental impacts of transport activities by supporting the increased provision of cleaner transport fuels, including hydrogen, particularly with respect to the refuelling infrastructure.
- 18.12 The report concludes that on site traffic related air quality effects during the Games are not likely to be significant. Further detail needs to be provided to justify this conclusion.
- 18.13 The means to provide waterborne passenger services to the Games needs to be clarified and the most obvious route for visitor boat services during the Games is from the Thames via Bow Creek.
- 18.14 Additional information on the reasons for the closure of Lee Navigation and towpath during the construction phase is requested.
- 18.15 Greater detail needs to be provided on the walking and cycling environments (especially from public transport nodes to the Games site for walking). It needs to be outlined whether conditions will be able to cope with peak flows (so assessment in terms of dimensions and materials is required). Walking audits of the site are required in line with the TfL guidance note 'Improving Walkability'. An PERS audit would examine the existing pedestrian environment in much greater detail, highlight issues and provide a basis for improving the pedestrian environment focused on the needs of pedestrians.

- 18.16 The use of Fruin's Level of Service is acknowledged and supported in terms of assessing pedestrian capacity and crowding. However, this is only concerned with the carrying capacity of available footway width and does not address issues of comfort and quality. TfL would prefer that the analysis of pedestrian flow/ footway width recommended by Gehl be used as the measuring basis as this reflects the aims of the Walking Plan for London to provide good quality footways that are of appropriate width. Gehl studies suggest that '13 people per minute per metre footway width is the upper limit for reasonably acceptable walking space. Beyond this level the situation turns to crowding. Where Fruin and other such measures define crowding according to levels of service (quantity) and how many people the street can carry, Gehl's measure is based on levels of quality.'
- 18.17 The TA is based on unfounded mode share predictions for walking and cycling. More attention should be paid to improving conditions for these modes in the planning application and TfL will need to have continuing dialogue with the ODA on this issue. The surrounding environment is not conducive to encouraging walking and cycling. Significant improvements for pedestrians and cyclists are likely to be delivered as part of the Stratford City and Olympics Park developments. However, the timescales for these improvements are not guaranteed. The application needs to demonstrate that high quality facilities will be in place to serve the Olympics Village with a particular focus on routes to public transport facilities and key services.
- 18.18 The Clays Lane area currently has a PTAL of 2 and is served by one bus service adjacent to the site on Temple Mill Lane along with four services on Leyton High Road approximately 400 metres walk. Improvements to public transport that have been proposed to serve the Stratford City development would increase the PTAL to 4. This would comprise additional and enhanced bus services as well as new facilities at Stratford Regional and International Stations. It is envisaged that these improvements would be in place by 2010 when the first phase of Stratford City opens.
- 18.19 However, this improved level of accessibility is dependent on the Stratford City development being built out as anticipated. Without the public transport improvements associated with Stratford City, the site would only have a PTAL of 2, which would not support a high density residential development. The Olympics Village development represents a significant increase on the number of residential units approved through the Stratford City outline planning permission, which in turn has increased through the zone one masterplan. The Transport Assessment recognises that the Olympics Village development will place additional demands on public transport, in particular bus services. This will lead to a requirement from TfL for revenue funding to provide additional public transport capacity.
- 18.20 Cycle parking should be in accordance with TfL and GLA guidelines. TfL welcomes the intention to provide cycle parking for the Olympics Village in accordance with TfL guidelines which specify a minimum of one secure space for 1 and 2 bed units and two spaces for larger units.
- 18.21 London Cycling Design Standards (LCDS) and DfT Inclusive Mobility should be used as reference sources for all cycling and walking-related schemes, including new bridges.
- 18.21 The 'Olympic Park main application, Vol. 2A Design and Access Statement' sets out the creation of new highways, including the 'loop road'. Section 7.7.15 states, the Olympic Loop Road will have a cross-section of 7.3m carriageway. TfL Cycling Centre of Excellence (CCE) recommends that for the newly designed roads a minimum width of 8m as opposed to 7.3m should be adopted as a standard carriage width. If there are high levels of HGVs, the preferred width is 9m, whilst a world-class facility should aim at a width of 10m. These principles should apply to all London 2012-related planning applications. A carriageway width of 7.3m leaves no room for cycle lanes and creates pinch-points for cyclists, as there is inadequate width for vehicles to overtake cyclists without crossing the centreline. With low traffic flows this may be acceptable, but with higher flows it turns cyclists into mobile chicanes, or encourages motor vehicles to attempt to pass when there is inadequate width.

- 18.22 Section 4.8 in the TA outlines existing gaps and constraints in the existing walking and cycling networks around the Olympic Park site, including inadequate A12 crossing options for cyclists and pedestrians. High-quality improvements to these environments are essential. The funding for these improvements will have to be contained and funded entirely from the Olympic Park development and additional to the £8m ODA cycling and walking funds to be allocated to TfL.
- 18.23 It is expected that many of the waterways and their towpaths will be closed during the construction period. This should generally be kept to the minimum necessary and suitable alternative routes should be established with clear signage. It is not clear whether the Lee Navigation and its towpath will remain open during the construction phase.
- 18.24 Early consideration should be given to notifications and assessment requirements under the Traffic Management Act 2004, for works affecting the performance of the TLRN and SRN, particularly for consents required in advance of the main construction programme. This should help avoid potential delays at implementation stage.
- 18.25 The Transport Assessment includes an aspiration to deliver up to 50% of construction traffic by more sustainable modes (rail and water). This is inadequate for a development of this scale. The aspiration should be much higher with a firm commitment in place to achieve this. Waterways can currently allow for the use of 100 tonne barges, in addition British Waterways are proposing to redevelop Prescott Lock to allow for the use of 350 tonne barges. The application does not provide clear planning on the design or location of possible loading and docking facilities along waterways.

## 19. Waste

- 19.1 In the Environmental Statement (Part 2 – Descriptions of proposals) there is a reference to materials that cannot be reused or recycled being recovered on site. It is though not clear what this means or includes, as there would seem to be no proposals or facilities included in the submitted material to allow this to happen. Also the documentation refers to 90% of site clearance waste being reused or recycled, however it is not clear what proportion is to be done on site and what offsite.
- 19.2 The proposals do not provide a commitment to diversion from landfill during the construction demolition phase.
- 19.3 Paragraph 8.5.2 of the Code of Construction Practice sets out the ODA's intended methods of waste transportation. It appears to place the same emphasis on road as rail, conveyor and canal transport and only aims to avoid residential areas. A transport hierarchy needs to be employed that discourages transportation and encourages conveyor, canal and rail transportation over road for material that needs transporting.
- 19.4 The applications do not rule out conventional incineration, nor do they commit to the use of emerging technologies for waste that cannot be recycled. Specifically they do not reflect the Mayor's strategy and in particular the Mayor's waste hierarchy that places new and emerging recovery technologies above conventional incineration on the grounds of efficiency and flexibility.
- 19.5 Despite the first paragraph of section 3.8 of the Environmental Statement Part 2 – Descriptions of Proposals starting 'The stated waste objective for the Games is to maximise opportunities to design out waste and provide new waste infrastructure. There is no clear commitment to waste treatment infrastructure anywhere in the documentation.
- 19.6 On the whole there are many acceptable overarching statements, all be with caveats, but no detail as to how these will be achieved and as such it is very difficult to determine whether the applications would be in line with the London Plan policies on waste and the Mayor's Municipal Waste Management Strategy.

19.7 There are a number of specific statements in the Energy Statement, which are not accepted by GLA technical officers. These include:

- “The technology for on-site generation of bio-gas is not currently commercially viable or technologically proven, particularly in the UK” (7.2.4).
- “Future use of biomass CHP is considered unlikely to be viable due to lack of technically proven systems at same scale, space constraints, which would impede legacy expansion potential, and current low electrical efficiencies” (7.2.5).
- “Energy from waste.. is not viable for use on-site due to space constraints and residential character of Park, together with character of Park during the Olympic Phase”. (8.3.7)

I would ask that a constructive dialogue be established with the relevant GLA technical officers to explore these issues further.

19.8 I am also concerned that opportunities to provide non incineration energy from waste, particularly those producing syn or bio gasses, have not been more fully considered, and I see no reason why an energy facility that utilises waste as a feedstock could not be provided.

## 20. Water

20.1 The GLA would like the ODA to produce and provide an ‘Integrated Water Management Plan’ to support the planning application. The Plan should identify expected average and peak water usage in Games and Legacy (consumption, hygiene and irrigation uses) and then look at the contributions from rainwater harvesting (linked to Sustainable Urban Drainage provision) and grey water recycling to supplement the mains water. The Plan should indicate where water efficiency savings are subject to behavioural variation (e.g. dual flush toilets) and increases in the seasonality of rainfall due climate change (drought)

20.2 Additional information is required as to what discharge strategy will apply to surface water directed into the Main Utilities corridor.

20.4 There is concern that Legacy drawings indicate that much of the permeable pavement networks will be removed in the Legacy phase.

20.5 There is no reference to rainwater harvesting which would be extremely useful in reducing demand for potable water, especially for irrigation of sports pitches and landscaping and should be relatively easy and inexpensive to fit.

## 21. Access and inclusive design

21.1 The submitted Design and Access Statement sets out high aspirations as to the how the principles of inclusive design and the specific access needs of disabled people are to be addressed, but the means to ensure that these key matters will be incorporated into the final proposals are not clear.

21.2 The 2004 consent included a range of conditions and requirements to secure a satisfactory approach to inclusive design, and included a condition that only allowed development to commence once an Access Framework had been submitted and approved. Whilst the timescales involved in the current proposals and the level of detail that is provided at this stage might mitigate against such an approach, similarly robust mechanisms to ensure satisfactory inclusive design should be put in place to address these matters.

21.3 Any new Access Framework (or similar document) should demonstrate and incorporate the following principles:

- Inclusive design will inform and be fully integrated into the proposals.
- Best practice standards (as opposed to minimum standards) will be adopted.

- Designers and users will work together to deliver the best reasonably practicable solutions for achieving inclusive access.
  - Individual venue access plans will be provided prior to commencement of construction or conversion of each venue.
  - Development shall be undertaken in accordance with the advice of the Disability Rights Commission on Access, the Disabled Persons Transport Advisory Committee's principles on inclusive design, and the ODPM's best practice planning and access guide.
  - The establishment of appropriate mechanisms for the implementation of the Framework to be monitored and reviewed at annual intervals, unless otherwise agreed by the Local Planning Authorities, in order to achieve its objectives.
- 21.4 Such an approach should ensure implementation of the Mayor's London Plan policy on meeting the highest standards of accessibility and inclusion as set out in Policy 4B.5 (and outlined in more detail in the Supplementary Planning Guidance to the London Plan 'Accessible London: achieving an inclusive environment' published in April 2004).
- 21.5 A number of detailed points have emerged from my initial assessment of the submitted material that are set out below. Further similar points may well emerge over the next period which will need to be addressed during the next stages of the submissions.
- 21.6 Page 45 para 5.4.4 (equality of access) - the principles of inclusive design are much more than just ensuring that disabled people can use the same routes as non disabled people. The bullet point should therefore be changed to accord with the Access Statement in Appendix 3, which in paragraph 3.2.12 page 47 sets out CABE's principles of inclusive design.
- 21.7 Paragraph 3.2.38 (page 51) states that each of the stages will be fully inclusive involving disabled people in their development, evaluation and management. This approach should be followed at all future meetings and may benefit from an appropriate planning condition.
- 21.8 Paragraph 3.2.43 (page 52) - these design notes are crucial to how the park will be designed. Can a condition be included to require that these design notes are published - as part of the ODA's Access Strategy - so that disabled people can see exactly what standards are being used in the design of the park? More work probably needs to be done on these standards to make sure that they are comprehensive and effective that involves disabled people. A comprehensive set of access standards for the Olympic Park developed in conjunction with disabled people would be an excellent legacy for London 2012 to leave to the IOC and IPC for use in future Games.
- 21.9 Paragraph 3.2.60-62 (Design note - Accessible Toilets). The detail is not included here but it is recommended that a fully wheelchair accessible cubicle is included and integrated within all male and female toilet blocks as well as the provision of at least two separate unisex cubicles (to provide both left and right handed transfer) adjacent to the male and female toilets. Consideration should also be given to the provision of a cubicle, which meets the MENCAP Changing Places standards to allow adult changing to take place.
- 21.10 Paragraphs 3.2.71 and 3.2.56 refer to signage and touch screen displays there is no mention of a wayfinding strategy. Given the huge diversity of people that will be using the park it is essential that a wayfinding strategy that does not just rely on signs is developed - for example by using new technology such as mobile phones to assist people through the park. Wayfinding is mentioned in paragraph 3.3.94 but a comprehensive strategy should be prepared and submitted for approval.
- 21.11 Paragraph 3.2.72 refers to the Lifetime Home standards but does not mention the Wheelchair Housing Design Guide as referenced in the London Plan. BSI are shortly publishing (in June 2007) a draft standard on accessible housing which updates the Lifetime Home standards and this should be referred to in the list of guidance in 3.2.73.

- 21.12 Paragraph 3.3.14 (Car Parking). There is a need to ensure that adequate car parking for blue badge holders is provided (both for home and overseas visitors), and clarity on the basis of the 550 spaces is requested, as is the means to ensure that they will be provided and managed effectively.
- 21.13 Paragraph 3.3.33. The gradient of the “easier” route is unclear. If this part of the detailed planning application is being approved now, then detailed drawings should be submitted showing how these gradients will work should be provided. If not, a condition should be included to show the detail - this is crucial in this location as this is the arrival point for disabled people using the BB bays and therefore their only entry into the park. It is not clear if the easier graded route is the also the 150m route or whether it is longer as many people cannot easily walk that far. It is also unclear what arrangements are proposed for people hiring equipment from Games Mobility to park closer to the entrance?
- 21.14 Paragraph 3.3.52. It is again unclear what gradients are proposed here, and fully detailed gradient plans should be submitted. It is also not clear what the statement “as gentle as can reasonably be achieved” actually means.
- 21.15 Paragraph 3.3.62. It is not clear if the bridge gradients are being approved now? If so more detail is needed, if not a condition is required that requires details to be subsequently submitted and approved.
- 21.16 Concourse Venue Interface (Paragraph 3.3.79). More details are needed regarding the external lift in the athletes training area and whether it will be retained in legacy.