

Committee: Strategic Development	Date: 21 st June 2007	Classification: Unrestricted	Agenda Item No: 8.2
Report of: Corporate Director of Development and Renewal		Title: Planning Application for Decision	
Case Officer: Rachel Blackwell		Ref No: PA/07/00218 & PA/07/00345	
		Wards: Bow East	

1. APPLICATION DETAILS

- Location:** **1./2. Site Preparation / Olympic, Paralympic and Legacy Transformation Planning Applications**
The site as it relates to the London Borough of Tower Hamlets includes: - *to the west by the A12 Blackwall Tunnel Northern Approach Road (part) the River Lea and the River Lea Navigation (Hackney Cut) and land on the western bank of the River Lea to the east of the A12 East Cross Route.*
- Existing Use:** **1./2. Site Preparation / Olympic, Paralympic and Legacy Transformation Planning Applications** – Number of uses, including industrial, storage, transportation, open space, residential and ancillary uses. The site also includes a significant amount of vacant and derelict land.
- Proposal:** For a full description of the proposals and the relevant proposals map for both the Olympic and Paralympic and the Olympic Village (part) and Legacy Residential Planning Application sites please refer to **Appendix A** – Revised Description.
- Drawing Nos:** For a full list of documents submitted with the Regulation 19 and clarification information please refer to **Appendix B**.
- Applicant:** **1./2. Site Preparation / Olympic, Paralympic and Legacy Transformation Planning Applications** - Olympic Delivery Authority C/- EDAW
- Owner:** London Development Agency
Historic Building: N/A
Conservation Area: N/A

2. RECOMMENDATION

- 2.1 The ODA Planning Decisions Team should consider the views and issues of the London Borough of Tower Hamlets as set out in the Observations Letter to the ODA PDT which is to follow the consideration of this report by the Strategic Development Committee.
- 2.2 That the **Corporate Director of Development and Renewal** be given **delegated powers** to make further observations and/or recommendations (as necessary) to the ODA.

LOCAL GOVERNMENT ACT 2000 (Section 97) LIST OF BACKGROUND PAPERS USED IN THE DRAFTING OF THIS REPORT

Brief Description of background papers:	Tick if copy supplied for register	Name and telephone no. of holder:
Application, plans, adopted UDP. draft LDF and London Plan		Eileen McGrath 020 7364 5321

3. SUMMARY

- 3.1 In February 2007 the Olympic, Paralympic and legacy transformation planning applications were submitted. Following the submission of these applications the Olympic Delivery Authority Planning Decisions Team (ODA-PDT) have requested under Regulation 19 of the EIA Regulations 1999, the submission of further information in relation to the facilities and their legacy transformation planning application (Ref 07/90010) and the site preparation planning application (Ref 07/90011).
- 3.2 The purpose of this report is for the London Borough of Tower Hamlets to provide observations on the proposals to the Planning Decisions Team at the Olympic Delivery Authority to assist in the assessment of the applications.
- 3.3 The following table summarises the Regulation 19 items requested by the ODA PDT:

Regulation 19 Items	Summary of Information Requested
General Environmental Issues	Construction measures to minimise environmental effects, assessment periods, further mitigation measures, cumulative effects.
Mitigation Measures	Details of mitigation measures set out in relation to the Code of Construction Practice, a Biodiversity Action Plan, the OPTEMS arrangements, a Travel Plan Strategy and a Local Employment & Training Framework.
Landscape and Townscape	<p>Details of any significant landscape and/or townscape and/or visual effects which may arise from the wind turbine, CCHP stack and any telecommunication masts and identification of mitigation measures proposed.</p> <p>Details of assessment of open space effects including the methodology used for assessment, quantification of the baseline and explanation of how the proposals at each phase of development address existing and future open space requirements for the user populations as they change over time.</p>
Socio-economic	Details of employment effects including a baseline illustrating present and future challenges in employment on site, a sensitivity analysis including a range of assumptions about indirect and induced multiplier effects, the value of construction employment, the extent to which construction employment will be recruited locally and the economic effects of the displacement of existing jobs. Details also relate to the sensitivity of the likely number and life of operational employment during the Olympic games phase and the long term tourism and visitor expenditure which will continue during legacy.
Transport	Further sensitivity analysis for the transport assessment in relation to the comparative effects, further clarification and or assurance

	of assumptions and approach, further assessment, and articulation on shuttle bus availability, junction capacity, remote public transport and highway impact and accident/safety implications required. Further information is requested in relation to junction and highways analysis and mitigation schemes.
Ecology and Nature Conservation	Provision of ecology plans detailing ecological constraints and areas to be safeguarded, confirmation on the extent of permanent overshadowing of watercourses by bridges and the impact and information on the effects of the wind turbine on bird and bat populations.
Noise and Vibration	Summary of significant environmental effects to include noise and vibration issues. The code of construction practice should detail specific information in relation to construction and operational noise.
Microclimate	Detail of the likely mitigation measures to deal with wind effects in addition to an assessment of the anticipated shadowing of waterways will impact on ecology and public enjoyment.
Archaeology	Provision of method statements, desk based assessments and written schemes of investigation for archaeological investigation.
Water and Waste	Further details to confirm the intended capacity and performance criteria for on site surface water drainage and collection systems, information on the capacity of the existing water supply infrastructure, extent of estimated average peak water usage, how water efficiency techniques will be used, where water efficiency savings are subject to behavioural variation and increases in the seasonality of rainfall due to climate change. A revised flood risk assessment along the key likely cumulative effects.
Soils and Contaminated land	A zone by zone summary is required to identify the extent of existing site investigations, programme, extent and method statement of further site investigations, principle remediation and other mitigation measures planned.
Air Quality	A revised Code of construction practice should set out the measures taken to avoid, minimise and manage unacceptable generation of dust. A cumulative assessment required of the transport emissions, the localised impact of the biomass boilers and temporary diesel generators.

- 3.4 The EIA will be assessed by the ODA PDT in accordance with the EIA Regulations 1999. In addition to the further information required under Regulation 19, additional supplementary information has also been submitted. This additional information covers minor amendments to the scheme since the February 2007 applications which are a result of further detailed design, the correction of minor errors and an update on the status of relocation programmes for businesses, travellers, Clays Lane residents, Eastway Cycle Circuit, Manor Gardens Allotments and the Bus Depots. This supplementary information is also in response to comments raised throughout the consultation process, including comments by the relevant hosting boroughs.

Amendments to the Scheme

- 3.5 Since the submission of the planning application in February 2007 the further detailed design has evolved and a number of minor revisions have been made to the proposals. Amendments as they relate to the London Borough of Tower Hamlets are as follows:
- Bridges: five bridge changes including the raising of Bridge L03 in Planning Delivery Zone (PDZ) 4 (within the London Borough of Tower Hamlets) due to a conflict with existing rail infrastructure.
 - Retaining walls and reinforced slopes: the removal of a small retaining wall in PDZ4 as it is considered to be part of the wing wall of bridge H17.
 - Demolition: a number of buildings on the western bank of the Lea Navigation to be demolished in PDZ4 in order to accommodate bridges to improve links to the west.
- 3.6 As a consequence of the amendments to the scheme the descriptions of development have been revised for the planning applications. Generally these changes could be described as minor and have very little material impact.

4. ISSUES

The following section of the report addresses the issues previously identified by the London Borough of Tower Hamlets and sets out:

- The initial recommendation of the London Borough of Tower Hamlets (A copy of the original report of March 2006 is provided at **Appendix C**);
- Summaries the response provided by the ODA; and
- Sets out the revised recommendations of the London Borough of Tower Hamlets and states if concerns have been satisfied, suggests conditions where appropriate, and/ or identifies the requirement for further information when details are submitted for approval in future submissions.

Issue 1: Commitment to Sustainable Regeneration

London Borough of Tower Hamlets Initial Recommendation

- 4.1 Given that regeneration and a positive legacy are primary aims of the 2012 Games the lack of commitment and the potential negative legacy are major concerns. These concerns could be addressed by:
- Producing a rigorous urban design analysis of the form the legacy communities development should take in order to provide well connected and sustainable communities and then demonstrating how the Olympics phase either provides that platform or if it cannot, how that platform will be provided in Olympic Legacy.

- Revising the application to reflect the land use designations in the Leaside Area Action Plan and LLVOAPF.
- Ensuring bridges to Tower Hamlets are built as permanent features that improve connectivity between the Olympic Park and Fish Island.
- Either alter the location of the inner ring road or ensure that it is a temporary feature that is removed as part of the deconstruction process.

Urban Design & Connectivity

- 4.2 The road layout of the site and connectivity with surrounding communities is considered to be poor. The application needs to demonstrate legacy road layout for its future connection / integration with existing urban fabric and connectivity with the surrounding area, particularly facilities and amenities such as the new park, sporting facilities and Stratford City. The existing layout and schematic block plans proposed show primary routes and development parcels. It is understood that each site would be developed stage by stage, however it needs to be ensured that movement, and access to facilities and amenities are designed in response to the topography and constraints of the site and surrounding area.
- 4.3 Whilst the provision of a loop road is necessary for the functioning of the Olympics, the provision of such a piece of engineering would not take place if this site was being redeveloped without the Olympic event being held here. To show its virtual complete retention in Olympic Legacy in these applications is surprising to say the least. The lack of any clear analysis of how the area should function in 2012+ in urban design terms is a fundamental weakness in these applications. To say that these details will follow in Legacy Communities is just not acceptable. If these planning permissions are granted in the form that they have been made, planning permission will exist for a network of roads that have been largely chosen because they suit the running of the Olympics from this location and not because they provide the necessary highway and servicing infrastructure to support the future development of these areas. This cannot be accepted for a regeneration project of the scale and importance of this.
- 4.4 Addressing this shortcoming in the application will be challenging and difficult at this late stage. The Council fully supports the Olympics and the success of that project for the country cannot be risked. The only way to address this issue is for the application to be amended so that the legacy elements are submitted as illustrative at this stage, and will therefore need to be submitted in detail following a proper urban design analysis of the legacy provision. The provision of the Olympics legacy framework of roads and bridges would be controlled through a Grampian condition linked to the first use of any of the retained facilities, such as the main stadium or the athletes' village. This would mean that the alteration of any permanent facility could not take place until the legacy proposals that are contained in this application have been submitted and approved and the facility could not be first used until the approved legacy proposals have been provided.
- 4.5 The access from the loop road from the London Borough of Tower Hamlets side is weak in legacy mode. Additional work is required to provide access to site 4 and 8. The London Borough of Tower Hamlets has major residential proposals along Wick Lane, Tredegar Road and Roman Road, and it would be of great benefit to have least one vehicular link all the way to the Olympics Stadium and parkland and more importantly extending along to the Aquatics centre and Stratford City.
- 4.6 The road infrastructure and access establishes the framework for the future urban form. It is difficult to envisage how the "leftover" spaces around the sports venues in legacy mode would be transformed into "places". The Design and Access statement refers to the Legacy Masterplan Framework (LMF) for the Olympics parks, which will determine the detail, scale and development form of the legacy communities. However it is considered vital that more details are provided at this stage in order to predict the needs of future communities. A spatial framework or urban structure should be prepared.

- 4.7 The London Borough of Tower Hamlets would seek to ensure that the design and built form of proposed buildings which requires the bulk, height and density of development to positively relate to surrounding building plots and blocks, and the scale of development in the surrounding area.

The Greenway

- 4.8 In order to provide the most benefit for pedestrians and cyclists accessing the Greenway from the western (Tower Hamlets) end, a solution should be designed that allows direct access to the land bridge on both the northwest and the southeast side of the railway

Footbridges Linking the London Borough of Tower Hamlets to the Olympic Park/Connectivity

- 4.9 In order to provide the best possible benefits to Tower Hamlets' residents, guarantees should be sought that:
- The construction of the permanent bridges is mandatory and cannot be withdrawn at a later stage. Planning permission for temporary structures should only be given on the condition that these are replaced with permanent structures after the Games.
 - At no point will the established connection between the Olympic Park and the rest of Tower Hamlets be severed. Construction of permanent bridges should be scheduled so that there is always one of the two bridges available at all times.

Any permanent structure that replaces these temporary bridges will require technical and highways approval by Tower Hamlets.

- 4.10 The mechanics of securing permanent bridges through the grant of a planning permission needs very careful consideration. A positive planning condition to provide the bridges is effectively unenforceable. To be effective, planning conditions have to be worded in a negative manner and the Grampian form is ideal here. This would mean that something that is beneficial to the developer should not happen until what we want (the provision of the bridges) happens. It is recommended that the method suggested above in relation to the wider legacy design issues be used here also. Therefore the design for the bridges should be submitted and approved prior to any alterations taking place to any of the retained facilities and the first use of any of those facilities should not take place until the bridges have been provided.

Open Space

- 4.11 The Council expects an overall gain in publicly accessible open space with true amenity value for local residents, particularly given the loss of Metropolitan Open Land (note that this will be a departure from the London Plan policy 3D.9 and will therefore require notification to the Secretary of State). The Olympics area has been identified as deficient on access to open space and any regeneration strategy or planning application should take this factor into consideration.
- 4.12 Guarantees should be sought that areas designated as legacy communities will include sufficient open space to meet the standards set by the London Plan.
- 4.13 The Legacy Master Plan should not only address the connectivity of green space and open space within the Area, but look at links with green and open spaces outside of the boundary, especially with regards to Victoria Park to the west. Further work needs to be undertaken with regard to ownership, management and maintenance of the legacy park. This should be conditioned by the ODA.

ODA Response

- 4.14 The ODA response to these matters is contained within Volume 11 of the further information submitted which deals with consultation responses or other matters not raised in the regulation 19 response.

Approach to Legacy Communities

- 4.15 Two main matters were raised regarding 'Legacy Communities' elements of the proposals. Firstly, ensuring that the Legacy Masterplan Framework is coordinated with regeneration initiatives outside the Olympic Park to deliver: compatible development schemes, permeability of the Park with surrounding communities and linkages to local business support and inward investment initiatives in the wider area. Secondly, providing clarity that the legacy development platforms are appropriately scaled for future sustainable 'Legacy Communities' development and that the Legacy transformation infrastructure (including road layouts and access points) will not preclude the layout, form and content of the future legacy communities.
- 4.16 The Commitment to Sustainable Regeneration (CSR) explains the ODA and LDA's commitment to ensure that the Olympic Park provides a benchmark for high quality, well-planned and comprehensive development of the Lea Valley. The term 'Legacy Communities' is used to describe the development that will take place around the retained Legacy facilities to provide new homes, work space, schools, health and other community facilities.
- 4.17 It is proposed that the nature, scale, layout and form of the future sustainable legacy communities will be addressed in a Legacy Masterplan Framework (LMF), which will be an integrated spatial masterplan to assess the key physical, economic, social and environmental benefits of the legacy communities uses.
- 4.18 The LMF vision set out in the CSR indicates that the legacy communities will need to be easy to move through and well connected to the surrounding areas, the Lower Lea Valley and the wider London area. The CSR identifies a number of commitments that will underpin the development of the LMF, these include the following:
- To structure the legacy communities as part of the existing [surrounding] urban areas to create a series of interconnecting communities and ensure that the existing communities benefit from the improved environment, services and facility, employment and housing opportunities [in the Olympic Park];
 - To consider the mix of land uses in regard to those provided in the transformed legacy facilities, and in proximity to the Legacy Park, and in particular to complement the type and range of facilities delivered as part of Stratford City developments and the improvements to Stratford Town Centre;
 - To provide a platform to create the context for a wide range of new and diverse employment business and training opportunities, providing opportunities for not only those moving to the new communities but also those in the surrounding communities;
 - To build on initiatives delivered through the Local Employment and Training Framework, which was launched by the LDA with the boroughs following the 2004 permission;
 - The definition of [legacy community] character areas will be determined in a holistic fashion including consideration of land use, design, character of open spaces and the surrounding built context;
 - To take account of the needs of new communities and also those of the existing communities in the surrounding areas to cater for different needs across age groups, genders and ethnicities.
- 4.19 It is the intention of the ODA and LDA that the legacy communities are integrated with the urban areas within the catchment area of the Park. In terms of consistency with existing and emerging regeneration initiatives, the LMF will be framed in the context of regeneration

objectives for the wider area as set out in the LLV Opportunity Area Planning Framework and development plan policy (as it pertains at the time).

- 4.20 It is important to note that the network of long term legacy Highways are not described in the 'Sitewide Illustrative Legacy Phase Masterplan' is not intended to be exhaustive. It is intended that the plan does not prevent further thinking as part of the development of the Legacy Masterplan Framework. The plan illustrates the parts of the Loop Road that will be retained and additional highways that will be required to ensure that the transformed facilities, employment areas and new homes are made accessible to all those who live work and visit the area.
- 4.21 This plan will establish the network of streets and buildings within the areas currently defined as 'remediated and serviced future development land' to create an integrated pattern of new development and an extension of the existing network of streets.
- 4.22 As part of the process to evolve the LMF, the design of the Legacy Highways will be subject to further review. This process may reveal opportunities, where appropriate, for additional parts of the Loop Road to be removed, realigned or downgraded to ensure the structure of the Legacy Communities development delivers the most appropriate response to the site and its context.

The Greenway

- 4.23 Several issues were raised regarding the lack of details on Greenway improvements including the retention of associated bridges, the ability to access the Greenway and continued use by pedestrian and cyclists during each phase of development.
- 4.24 The proposals contemplate improvements to and upgrade of the Greenway from West Ham Station to Victoria Park The improvement works will include (but not necessarily be limited to) the following works:
- Footpath / Cycleway upgrade and widening
 - Access ramps and steps
 - Lighting
 - Barriers & fencing
 - Street furniture including benches and bins
 - Vegetation removal
 - Planting
- 4.25 The works are intended:
- To mitigate the closure of Carpenters Road by providing a safe alternative route across the Olympic Park site for cyclist and pedestrians.
 - To help transform the section of Greenway from West Ham Station to Victoria Park into an area that is attractive and provides a safe, lit and welcoming environment for visitors and users.
 - Assist in providing a pedestrian route along the Greenway to transfer Games visitors and spectators from West Ham Station and Victoria Park to the Olympic Park.
 - To use the project to engage local communities to engender a sense of ownership of the Greenway.
- 4.26 A variety of works and treatments and alternative routes are proposed to the Greenway during the different phases of Olympic Games development these are summarised below.
- 4.27 Olympic Park Construction Phase
The proposed final diversion route for the closure of Carpenter's Road is via the Greenway

from Stratford High Street to Wick Lane. It will be lit during the early morning and evening commuter demand periods. The intention is to carry out wholesale improvements of this section by summer 2008, including landscaping, lighting installation, pathway and access ramp upgrades. In the interim period, between summer 2007 and summer 2008, a temporary route will be established along the Greenway from Marshgate Lane to Wick Lane and shall include temporary lighting and surface improvements. The route from Stratford High Street to the Greenway may change to accommodate construction activities and shall be Pudding Mill Lane, Pudding Mill Lane/ Marshgate Lane or the Greenway.

4.28 Games Phase

The section of the Greenway from West Ham Station to Stratford High Street will provide the main pedestrian access route to the southern entrance to the Olympic Park supporting approximately 20% of the daily visitor traffic. The eastern section from Old Ford Lock to St Marks Gate, Victoria Park will be used to connect the Olympic Park to Victoria Park; which will be used to host cultural events during the Games. There are proposals to upgrade both of these sections.

4.29 The remaining section of Greenway, from Marshgate Lane to Old Ford Lock, would be closed to the public during the Games period but used by operational personnel.

4.30 Legacy Phase

The improvement works proposed would enable this section of the Greenway route to be used in Legacy as a linear urban park and cycleway.

Open Space Provision

4.31 If granted, the 2007 planning applications will replace the 2004 planning permission that supported the London 2012 bid. Between 2004 and 2007 a number of strategic moves were made that have helped to reduce the land required for the Games and improved the economic and social viability of their legacy. These moves have meant the area of land requiring planning permission for the Games was reduced from 274 hectares in 2004 to 246 hectares in 2007. Despite this, the core parklands area has remained broadly the same and the green 'lung' connections described above remain at the heart of the proposals.

London Borough of Tower Hamlets Revised Recommendation

Commitment to Sustainable Regeneration

4.32 In order to ensure long term sustainable development of the Olympic site and its integration with the surrounding context the principles of the masterplan framework and the ability to take it forward must be established from the outset.

4.33 Whilst an overall commitment to sustainable regeneration and the preparation of the Legacy Masterplan Framework (LMF) seeks to take forward development of future communities on the site and integration with the surrounding context, it is considered that the LMF and the principles established through this framework such as the road network, provision of bridges, etc, should be secured and delivered by the ODA in legacy. If not these features, which are required to ensure the development of future sustainable communities, will be left to uncertain mechanisms to achieve and thus may not be implemented. The boroughs must also be consulted on the principles of the LMF to ensure that the legacy communities proposed are cohesive with existing surrounding communities.

4.34 It is recommended that the principles and implementation of the LMF are secured through the planning permission for the Olympics and legacy. Prior to the commencement of the Olympic games the LMF must be approved and delivery of infrastructure secured to take forward the establishment of legacy communities.

Urban Design and Connectivity

- 4.35 Urban design and connectivity both within the site and surrounding communities is one of the most important considerations to be established in the LMF. The Olympic legacy will result in the development of a very large new park as well as the establishment of substantially sized communities. One of the most important elements of the Masterplan framework should be to ensure that the park and its communities are designed to high standards and ensure sustainable linkages/connectivity both through the site and to surrounding communities.
- 4.36 The London Borough of Tower Hamlets expressed a number of concerns in relation to the details provided on urban design and connectivity in the application documentation and the principles of the LMF, these concerns include:
- the alignment of the loop road and the impact upon future development,
 - ensuring that future proposals for the Olympic facilities such as the basketball arena and CCHP are designed to a high standard;
 - the lack of detail and commitment to providing bridges which will seek to connect existing communities to the site,
 - lack of detail on the detailed design of the greenway;
- 4.37 The London Borough of Tower Hamlets has expressed concerns regarding the location of the loop road and relationship to existing and future communities.
- 4.38 The ODA advice that the loop road is not considered to be a permanent structure (in some locations) and it is intended to remove the loop road and construct new roads in legacy which will service the legacy communities. A plan showing the removal of the loop road in legacy and detailing a new road running centrally through PDZ4 (within London Borough of Tower Hamlets) has been included in the transport assessment. This route is not yet designed or finalised as it will form part of the LMF. It is the intention of the ODA that once the LMF roads are finalised the loop road may be removed as it will no longer be necessary.
- 4.39 There is some infrastructure located under the loop road. In LBTH this is a water main which may act as a constraint to development at this location. The LDA are presently consulting with Thames Water on the exact location of this main and indeed it could be removed in the future.
- 4.40 Despite this any further development proposed in legacy could be designed around this constraint. If the water main was to remain this constraint would allow for any future development proposals at this location to be setback from the navigation providing for the establishment for additional open space with access to the water and provision of cycle and pedestrian networks at this location.
- 4.41 It is recommended that temporary planning permission for the loop road linked to its permanent replacement, be provided. On the completion of the LMF and finalisation of the road network in legacy the loop road should be removed, where appropriate. A section 106 agreement could set out the process and programme for conditions relating to this.

The Greenway

- 4.42 The Greenway forms a strategic east/west link between East Ham and Victoria Park, which will enable London Borough of Tower Hamlets residents to access the Olympic park, legacy communities and Stratford.
- 4.43 In response to the borough concerns regarding the lack of connection from this link into the legacy communities and Stratford the ODA has stated that they seek to work with stakeholders to facilitate general improvements in legacy to ensure that the Greenway acts as a sustainable connection.

- 4.44 In order to do this the ODA are developing a strategy for the entire route, from East Ham to Victoria Park. They are currently reviewing their options and a new option is to be submitted in the future. The ODA has asked for the boroughs assistance in taking this forward.
- 4.45 It is recommended that a strategy detailing improvements to the greenway is submitted prior to commencement of construction of Olympic venues. A second strategy would also be required to deal with improvements to the Greenway in legacy. Funding for these improvements would come from the ODA/LDA.

Footbridges Linking the London Borough of Tower Hamlets to the Olympic Park/Connectivity

- 4.46 There will a total of 31 Bridges across the Olympic Site. Some of these bridges will be built for the Games and will be retained into Legacy. These "Permanent" bridges will be built to accommodate Legacy usage and not Games usage, and hence alongside the "Permanent" bridges will be "Temporary" bridges to accommodate the extra flow that will be generated during the Games Phase. Of the three bridges provided within the London Borough of Tower Hamlets, all are temporary.
- 4.47 The Olympics and Legacy will result in the construction of one of the largest parks in Europe featuring world class sporting facilities. The lack of commitment to the provision of adequate linkages into this park from surrounding communities in legacy is poor planning and will result in unsustainable outcomes.
- 4.48 Certainty is required to ensure that all residents can access the park and the legacy facilities such as the stadium and aquatics centre.
- 4.49 Outline planning permission is currently sought for a number of bridges. There is no clear mechanism for the three bridges within Tower Hamlets to be retained and replaced in legacy. Presently there is no clear commitment from the ODA to secure the provision of bridges on the site after the Olympics. It is sought that the provision of bridges will be determined in the LMF. The provision of bridges to the location of future legacy communities within PDZ4 must be secured following the conclusion of the Olympics event and on into legacy to ensure that London Borough of Tower Hamlets residents have access to the park. If the permanent bridges are reliant on legacy development provision to be provided then in the time between the end of the Olympics and the development of these sites the boroughs residents will not have access to the park.
- 4.50 The main issue for the London Borough of Tower Hamlets is pedestrian and cycle access for replacement bridges rather than for vehicles, as long as these linkages are maintained in legacy. Permanent structures should be put in place once the layout of the legacy road network is finalised as part of the LMF.
- 4.51 A commitment is required from the ODA to ensure that these bridges can be provided in legacy. It is essential that any planning permission granted secures the connectivity routes. This could be secured through a section 106 agreement or a condition of approval.
- 4.52 In order to provide the best possible benefits to Tower Hamlets' residents, guarantees should be sought that:
- The construction of the permanent bridges is mandatory and cannot be withdrawn at a later stage. Planning permission for temporary structures should only be given on the condition that these are replaced with permanent structures in legacy.
 - At no point will the established connection between the Olympic Park and the rest of Tower Hamlets be severed. Construction of permanent bridges should be scheduled so that there is always one of the two bridges available at all times or that a temporary structure is provided to bridge any gaps in time.

Any permanent structure that replaces these temporary bridges will require technical and highways approval by Tower Hamlets.

Open Space

- 4.53 The London Borough of Tower Hamlets was originally opposed to the net loss of open space within LBTH and sought compensation for this via section 106.
- 4.54 Following review of the further information submitted it is considered that the most favourable outcome for the borough would be to ensure that the open space provided both within the London Borough of Tower Hamlets and the remainder of the Olympic park is of the highest quality and that this space and its facilities are accessible to surrounding communities including London Borough of Tower Hamlets residents.
- 4.55 As discussed above, the LMF, relevant planning conditions and a section 106 agreement will seek to ensure that the open spaces created through the Olympics and its legacy are designed and implemented to world class standards and that access to these spaces and throughout the park is secured and adequately implemented.
- 4.56 The development platforms within Tower Hamlets which will be developed following the games will be subject to the Boroughs own open space and amenity requirements. Further development proposals on the development platforms will need to integrate with existing and proposed open space.
- 4.57 In order to ensure efficient management of the park and its facilities it is recommended that prior to the commencement of construction of the Olympic venues a park management plan is provided and a steering group formed for implementation. A park management plan would also be required in legacy to deal with management and day to day maintenance.

Issue 2: Sustainable Environment

Environmental Impact Assessment

London Borough of Tower Hamlets Initial Recommendation

- 4.58 It is recommended that Regulation 19 is used to ensure a more consistent and therefore accurate picture of environmental effects in this important document.
- 4.59 The Environmental Impact Assessment suggests a number of mitigation measures to reduce significant environmental effects. It is recommended that most if not all of these are included as some form of condition when granting planning permission. It is not sufficient to state that the development should be carried out in accordance with the Environmental Impact Assessment; individual conditions concerning mitigation measures must be listed.
- 4.60 Effective monitoring agreements between the ODA and contractors need to be put in place to ensure that the mitigation measures set in place during construction as well as during operation and beyond are effective and are achieving what they set out to achieve.
- 4.61 In terms of cumulative effects, the major developments as part of the London Thames Gateway have not been assessed. This is a major omission for this chapter of the Environmental Impact Assessment.

ODA Response

- 4.62 The ODA has submitted further information pursuant to Regulation 19 of the EIA Regulations 1999.

London Borough of Tower Hamlets Revised Recommendation

- 4.63 The Environmental Statement (ES) and in particular the 'further information provided' suggests a number of mitigation measures to reduce significant environmental effects. It is recommended that most if not all of these are included as some form of condition when granting planning permission. It is not sufficient to state that the development should be carried out in accordance with the ES, individual conditions concerning mitigation measures need to be listed.
- 4.64 Effective monitoring agreements between the ODA and contractors need to be put in place to ensure that the mitigation measures set in place during construction as well as during operation and beyond are effective and are achieving what they set out to achieve. This seems particularly well thought out in terms of the employment, training and business objectives.
- 4.65 In terms of cumulative effects, the major developments as part of the London Thames Gateway have still not been assessed.

Biodiversity/Ecology

Initial View of London Borough of Tower Hamlets

- 4.66 The Council expects an overall net gain in biodiversity as a result of the Games.
- 4.67 The impact on biodiversity during all different phases of the Olympics and the uses made of the land should be clearly defined and adequate mitigation mechanisms put in place before permission is granted.
- 4.68 Appropriate mitigation measures need to be conditioned to ensure that minimum disruption is caused to trees which are proposed to be retained.
- 4.69 Potential off site pollution sources to rivers and canals should be identified and an assessment made. If this is not already addressed within the EIA, this should form a Regulation 19 request.
- 4.70 The amount of excavation proposed across the site should be minimised as much as possible to limit environmental effects. The reduction of 40% water usage should be conditioned by the ODA in order to ensure achievement of this goal.

ODA Response

- 4.71 The ODA has Submitted a Biodiversity Action Plan to address the requirements of the regulation 19 request.
- 4.72 The biodiversity action plan seeks to provide a framework for habitat creation and management that will be developed with partners and stakeholders.
- 4.73 The document is guided by the overall vision and ecological design principles for the Olympic park which will seek to provide a high quality accessible green space for Londoners.
- 4.74 The intention of the plan is to conserve and enhance biodiversity during the construction phase and through to Olympic legacy. Whilst it is acknowledged that the areas of habitat will fall during site preparation and for the staging of the Olympics where practical existing habitats and wildlife will be safeguarded. Thereafter the Olympic park will be transformed to include increased habitat.

- 4.75 The action plan will be developed in accordance with the principles and recommendations of the code of construction practice and suitable development strategy as well as the London 2012 Biodiversity Strategy as well as international, national, London and borough policy.

London Borough of Tower Hamlets Revised Recommendation

- 4.76 The biodiversity action plan submitted goes some way to identifying issues and actions in relation to biodiversity on the site. It is recommended that mitigation measures should be secured through planning conditions to maximise the opportunities to retain existing or create new habitat in order to ensure establishment of maximum biodiversity in the Legacy Park.
- 4.77 It is noted that the biodiversity action plan would relate to a number of additional documents which would be produced as part of the LMP. The supplementary documents will deal with particular species and habitats as and when the full detail of design is available.
- 4.78 In order to ensure that the commitments made by the ODA will be implemented appropriate conditions must be required. This will ensure that whoever takes over responsibility for the Olympic Park in legacy will deliver the commitments made as part of the planning application proposals.

Issue 3: Making the Best Use of Waterways

Initial View of London Borough of Tower Hamlets:

- 4.79
- It is important to relate water freight access to places where future employment and industry will be located and to road access to allow for intermodal transfer, particularly for waste and recyclates. A number of piers and wharves should be designed and located throughout the site to provide connections to the construction sites for water freight.
 - A wharf located near the railhead at Bow Midland (St Clement's Wharf) could be used to facilitate the onward transfer by barge of materials arriving by rail to construction sites within the Park.
 - On site construction facilities such as concrete batching plants and reception areas should be located so as to transport raw materials and construction materials straight to and from the waterways.
 - Piers located at strategic points would provide access to the venues for transporting passengers on the waterways within the Park.
 - Waste generated on site during the Games could be removed via the wharves and piers on barges rather than lorries. Access to waterways should be one of the factors involved in choosing the locations for the waste management areas.
 - Wharves and piers built for the Olympics can continue into the legacy period and be used in connection with future industrial and residential development.
 - Locations for a marina and moorings should be considered so that the waterways can be enjoyed in the legacy period for leisure and recreation.
 - Sources supplying wood fuel for the Biomass Plant should, if possible, be adjacent to the waterway network and access onto the waterways should be identified or created to allow road sourced fuel to transfer to barge.

London Borough of Tower Hamlets Revised Recommendation

- 4.80 It is considered that the ODA has not responded to the boroughs aspirations for making the best use of the waterway network provided throughout the site. The information provided relates to amendments to the scheme based on flood information.
- 4.81 A lack of detail on this issue would suggest that there is lack of commitment by the ODA to utilise water transport during construction, in the Olympics and its legacy.

- 4.82 It is understood that whilst it may not be possible, for security reasons to utilise waterborne transport during the games (6 week period) great opportunities exist to establish towpath provision, boat mooring, wharfs and access facilities to promote waterborne transport for visitors, waste disposal and freight in legacy.
- 4.83 Wharfing and waterborne transport should also be provided and secured adjacent to the CCHP to ensure that sustainable freighting is used for supplies to the Energy Centre.
- 4.84 The details of this would need to be established and secured through the LMF however a hard edge is required in some locations throughout the site to promote waterborne transport and therefore this needs to be addressed as part of this application.
- 4.85 It is therefore recommended that a commitment to secure waterborne transport and access during all phases of the Olympics and legacy is secured through relevant conditions of approval or a Section 106 agreement.
- 4.86 It is recommended that the above measures be secured through relevant planning conditions detailed as follows:
- Waterborne transport to be explored in Olympics phase.
 - Waterborne Transport and Freight strategy to be established and implemented through the LMF.
 - At least 50% of supplies for the CCHP biomass boilers must be delivered to the site by water.

Issue 4: Renewable Energy & Sustainable Waste Management

Renewable Energy

Initial View of London Borough of Tower Hamlets

- 4.87 Generally, it is felt that the renewables and CO₂ emission reduction targets should be raised higher than 20%. This is to reflect future targets of Zero Carbon developments. Given that the timeframe for the application goes beyond 2014 the likelihood for more stringent legislation is very high. Raising the targets would also send a clear message to all stakeholders and interested parties that the ODA is serious about making these Games the most sustainable in history.
- 4.88 A condition should be imposed that wood chips can only be transported by barge or other water transport vessel and that the wood is sourced from sustainable sources and as close to the site as possible to avoid excessive transportation and therefore reduce the positive impacts in terms of CO₂ reduction.
- 4.89 Whilst the ODA appear to be content with the potential reduction of 34% carbon emissions from the predicted baseline the evidence suggests that a target of carbon neutral or pure zero carbon powered games is easily achievable via a mixture of commercially available and proven technologies. Therefore more measures should be integrated into the park design if the aims of delivering a truly sustainable games are to be realised. Suggested measures include:
- Energy Efficiency in Buildings: The targeted aspiration of 15% improvement on current building regulations needs to be higher. The Building Research Establishment (BRE) should take an Olympic standard on this view.
 - Supermag: Supermag technology (using natural magnetic fields) which results in zero emissions should be implemented to assist the Olympics in achieving zero carbon

emissions.

- Carbon Mitigation Strategy: Fuel cell providers should be supplying zero carbon energy on site with control via the energy centre.
- Carbon Dioxide Emissions Reduction through Renewable sources: the proposed target of 20% from these sources is poor and should be improved to in excess of 50%.
- Rain water harvesting should be implemented as the vast amounts of roof space proposed mean that this feature would be viable.

ODA Response

- 4.90 The regulation 19 response details further information in relation to renewable energy.
- 4.91 Additional information states that the ODA Sustainability Strategy will seek to set energy efficiency targets. The ODA aims for the permanent venue structures to – post games- to be 15 % more energy efficient than 2006 Part L Building Regulations. The ODA aims for all permanent Olympic park venue structures post games to achieve a BREEAM Excellent rating. The environmental statement has taken this into account.
- 4.92 The ODA sustainability strategy indicates that it will seek to reduce the carbon intensity of the construction activities as part of its commitment to a low carbon development.

London Borough of Tower Hamlets Revised Recommendation

- 4.93 The London Borough of Tower Hamlets considers that the information provided in the environmental statement in relation to renewable energy is satisfactory. It is recommended that requirements for energy efficient targets be secured through relevant conditions of the planning permission.
- 4.94 In order to ensure sustainable energy production on the site for both the Olympics and in for the legacy communities it is considered that all permanent Legacy facilities and the Olympic Village be connected to the CCHP plant. It is also recommended that the plant be provided with the capacity to potentially provide energy to surrounding communities.
- 4.95 In addition the CCHP plant must be adaptable to new technology (such as fuel cells) as it becomes available.
- 4.96 The CCHP Plant would be powered through a combination of biomass and gas fired boilers which are powered through the burning of wood chips. It is recommended that if woodchips are going to be used to fire boilers that they be sourced from local suppliers and delivered to the site by water.
- 4.97 In relation to the proposed wind turbine, which is not located within the London Borough of Tower Hamlets, Councils Energy efficiency officer has recommended that the Wind Turbine project shall not commence until ODA commissions the Weather Met Office to produce a wind profile report to scientifically identify the best position (that has the most potential of wind energy) for the Wind Turbine at the Olympic site.
- 4.98 In relation to the impacts of the CCHP on Air Quality the London Borough of Tower Hamlets Air Quality Officer has noted that there is insufficient justification that emissions from the biomass boilers and temporary diesel generators would have “minor adverse” effects. These potential emissions (and cumulative effects) need to be adequately accounted for via a comprehensive air quality assessment. In addition there is no detail on the guidance used in the air quality assessment and how the applicant arrived at the significance criteria used to assess the pollutants.
- 4.99 It is recommended that the above measures be secured through relevant planning conditions detailed as follows:

- The applicant will submit a detailed energy strategy
- At least 15% of energy efficiency requirements provided to above 1996 Building Regulations
- All Olympic and legacy facilities must be connected and maintain their primary energy source from the CCHP.
- All public facilities within the legacy facilities and Olympic park to be powered by the CCHP plant.
- The capacity, operation and technology within the CCHP plant must be reviewed every 5 years after the Olympic Games to ensure that new technologies are implemented in order to ensure sustainable energy production throughout the area.
- Supplies for the CCHP plant biomass boilers must be sourced from local suppliers within the Greater London Area.
- At least 50% of supplies for the CCHP biomass boilers must be delivered to the site by water.
- The Wind Turbine project shall not commence until ODA commissions the Weather Met Office to produce a wind profile report to scientifically identify the best position (that has the most potential of wind energy) for the Wind Turbine at the Olympic site.
- A comprehensive air quality assessment must be submitted.

Waste

Initial View of London Borough of Tower Hamlets

4.100 Waste has not been addressed beyond construction. It should be conditioned that a Waste Management Plan is produced for the Phase during the Olympic and Paralympic Games, with the aim of reducing the amount of waste produced during the Games and of re-using and finally recycling as much as possible

ODA Response

4.101 As part of the regulation 19 response the applicant has submitted further information in relation to waste management.

London Borough of Tower Hamlets Revised Recommendation

4.102 On review of the waste management information submitted it appears that waste issues have still not been addressed beyond the construction phase.

4.103 There will be excessive amounts of waste (approximately 5-10,000 tonnes) generated on and in the vicinity of the site in both the Olympics Games Phase and in legacy. Provision for waste and recycling must be designed into the Olympics venues and a detailed waste and recycling management strategy is required prior to the commencement of the Olympics to ensure that waste and recycling is efficiently and effectively managed on the site and in the surrounding area. Further information is also required to detail waste and recycling facilities and management for legacy venues and communities. Any waste management strategy prepared for the site would need to be consistent with the East London Waste Strategy in order to provide for sustainable operation in legacy.

4.104 Most importantly given the commitment that this will be the most sustainable games in history there must be a commitment to recycling both during the Olympic games and in legacy. It is recommended that a requirement for the recycling of at least of 90% of waste generated on site be imposed as part of the waste management strategy.

4.105 It is acknowledged that waste during the games may be treated on site. It is recommended that this option is thoroughly explored and secured as a reserved matter.

4.106 Opportunities are also available for moving waste from the site via the site's many waterways and rail links. It is considered that targets should be set to move reasonable amounts of waste from the site (i.e. 50% by sustainable forms of transport).

4.107 It is recommended that the above measures be secured through relevant planning conditions detailed as follows:

- Waste management during the Olympics and in legacy should be addressed in the environmental statement as recommended in the regulation 19 request of the ODA PDT.
- Provision of waste and recycling facilities must be detailed in the Olympic and legacy venues. Provision for waste and recycling facilities must also be provided within open space areas to accommodate the needs of visitors to the site.
- Prior to the use of the Olympics venues a waste and recycling management plan for the site and surrounding area must be submitted and approved. The plan must detail the following:
 - All waste is to be treated on site during the Olympic Games.
 - At least 50% of waste generated on the site is to be recycled.
 - Where not possible to treat on site at least 80% of waste must be removed from the site via sustainable forms of transport.

The above requirements must also be ensured in legacy.

Issue 5: Traffic & Transport Considerations

Initial View of London Borough of Tower Hamlets

4.108 Previously the London Borough of Tower Hamlets Strategic Transport and Highways Departments provided extensive comments on the Olympic and Legacy applications.

4.109 Please refer to issue 6 on page 32 of the Strategic Development Committee Report of the 15th March 2007 for a detailed summary of the issues raised.

ODA Response

4.110 Under Regulation 19 of the EIA regulations the ODA has submitted further information as part of the Transport Assessment. This includes, further sensitivity tests for the transport assessment in relation to comparative effects and potential effects, further clarification and or assurance of assumptions and approach, further assessment and articulation on shuttle bus availability, junction capacity, remote public transport and highways impacts and accident/safety implications required. Further information is provided in relation to junction and highways analysis and mitigation schemes.

4.111 Information is also provided in relation to the OPTEM arrangement, and a travel plan strategy.

London Borough of Tower Hamlets Revised Recommendation

4.112 The London Borough of Tower Hamlets Highways department has assessed the material submitted as part of the regulation 19 response and provides the following comments and recommendations:

Maximum Construction Workforce

4.113 The Transport Assessment indicates that workforce transport will be at its peak during 2010, when the anticipated workforce access to the Olympic and Stratford City site would be in the order of 8,000 people. It further suggests that the highest increases will be in eastbound counter-peak traffic. This will affect the both the Central and District Lines, as well as bus

services on Stratford High Street, which includes buses travelling through Tower Hamlets. In addition an increase in patronage to Bow Road Station Underground Station which is located within Tower Hamlets is noted.

- 4.114 The westbound Central line and southbound Jubilee line are also identified as having increasing in patronage in the evening peak. The 2010 effects on public transport have been identified as moderate adverse.
- 4.115 There is concern from Tower Hamlets that the routes through the borough will suffer from increased public transport traffic, resulting in some over crowding at stations, slower bus journeys and overcrowding on some bus routes. With this potentially happening measures need to be in place before 2009 to ensure the following:
- Bus service schedules need to be improved to accommodate increases in patronage.
 - Bow Road station improved to cater for the increase in the number of trains at peak, the option of running a service from Aldgate East to Upminster only during this time
 - Station crowding needs to be monitored and improvements made to ticket barriers, ticket machines and platform facilities to cope with increases in numbers, particularly at Bow Road and Mile End Underground stations
 - Signage is required at the Bow Road Underground and DLR Station exit to route pedestrians to the Olympic site.
- 4.116 These measures will ensure that local residents and workers accessing the borough for employment are not suffering unduly as a result of the Olympic construction.
- 4.117 It is recommended that the above measures be secured through relevant planning conditions detailed as follows:
- Prior to 2009 Bow Road and Mile End Stations to receive improvements to ticket barriers and ticket machines to improve passenger flow, in addition to signage from the station to the Olympic site.
 - Prior to 2009 bus frequencies improved on services along Stratford High Street to accommodate increases in patronage as a result of the Olympic construction.

Mile End Station in Legacy

- 4.118 Details submitted indicate that there is some possibility of a negative effect on the Mile End interchange on evenings that there are events scheduled in the legacy venues; this is particularly the case in the PM peak due to increased crowding on the central line, and bus routes providing services to Mile End Station. The response has been that a Venue Management Strategy would require additional bus and train services to cater for the demand.
- 4.119 It is considered by London Borough of Tower Hamlets Highways that this is an inadequate response and that a venue management strategy providing details of increased services to deal with the increased pressure on public transport should be in place before Games Operation as the legacy venues are proposed to be operational by 2014 at the latest. This is only 2 years after the Games Phase; these years should be spent adapting the service, station and interchanges to accommodate the increases.
- 4.120 It is only with physical changes to the Mile End Interchange that crowds will be accommodated. The ticket hall will be unable to cope with increases in demand. In addition the pavements and crossing facilities around Mile End station are barely adequate at current peak. Any further increases will result in more overcrowding and danger to pedestrians at this busy vehicle cross roads.
- 4.121 Venue management is important but must be supported with physical changes prior to the opening of legacy venues.

4.122 It is recommended that the above measures be secured through relevant planning conditions detailed as follows:

- Prior to operation of the first venue in legacy, Mile End Interchange including station, ticket hall, public highways and crossings must be redesigned and constructed.
- Prior to operation of the first venue in legacy, a venue management strategy should be submitted and approved. The strategy should detail increased public transport services to deal with the increased pressure on public transport.

OPTEMS

4.123 The Olympic Park Transport and Environmental Management Scheme (OPTEMS) group was welcomed in the application, the further clarification in Volume 6A of the Regulation 19 response is also seen as a more positive move to setting up the OPTEMS system of mitigation measures.

4.124 It is considered that further clarification is required to ensure that the group is set up and is operational in an effective and timely manner.

4.125 It is recommended that the above measures be secured through relevant planning conditions detailed as follows:

- As soon as practicable, but at least prior to the construction of Olympic venues the OPTEMS group must be operational to ensure that mitigation measures in areas around the park and on roads serving the park are designed, funded and constructed in time for the Games Operational Phase.

Parking

4.126 Please see notes in Travel Plan section.

Travel Plan

4.127 The increase in detail provided in the Regulation 19 response is welcomed however it is considered that further clarification is required concerning the methods of implementation, responsibilities and monitoring. Where relevant it is recommended that these items of clarification could be addressed through relevant conditions of approval or obligations of a Section 106 agreement.

Construction Travel Plan

4.128 In order to ensure that transport implications are monitored and controlled during construction it is recommended that relevant conditions of approval and the requirements of a Section 106 agreement secure the details of a construction travel plan. Suggested wording of this condition is provided as follows:

- Prior to the construction of buildings a construction travel plan must be submitted and approved. Monitoring should be completed and reported to the Construction Management Group every 6 months. Any recommendations for changes or improvements in managing construction travel should be implemented within 3 months.

Games Phase

4.129 The work that has been completed on this section of the travel plan is acceptable. It is understood that the Olympic Travel Plan is the guiding document for the Game Phase. The detail supplied in the revisions provided in the regulation 19 response have increased confidence in the joint working between the Olympic Travel Plan and the Application Site.

Legacy Venues

4.130 As per the above the further information provided allows for greater confidence in the

aspirations, management and monitoring of the Travel Plan for the Legacy Venues. However there is still concern over the anticipated vehicle numbers and targets for some of the Legacy venues in operation, both day to day and in event use.

- 4.131 Day to day car mode for the Velodrome (70%), Multi-Sports Arena (40%), Hockey Venue (40%) and Tennis (70%), is considered to be excessive. It is appreciated that there are travel and equipment issues at these sites; but more innovative solutions such as specialist bus/mini bus services, equipment storage, equipment hire and rental, delivery consolidation services would assist in reducing these numbers.
- 4.132 Similarly, Event Use car numbers for some of the venues are extremely high. The Multi-Sports Arena in competition (30%) and concert (43%), Hockey (30%) and Velodrome (30%) are particular concerns. These areas are in PTAL value areas between 3 and 5. This is not significantly low. Again with more innovative measures, such as specialist bus/minibus transport from transport hubs, walking guides and walking umpires (that were used for the Manchester Commonwealth Games) would boost more sustainable travel.
- 4.133 It is stated for event parking that there will be a management plan and that spaces at the IBC/MPC may not be sufficient and other spaces would be sought. This is unacceptable. The Games has a commitment not to allow any visitor or spectator to arrive by car, excluding people with mobility problems. This should be extended to all legacy venues. This change in approach from Games to Legacy is contradictory and not a sustainable approach.
- 4.134 In relation to the residential development proposed in legacy the desire to have uniform parking standard for the Olympic site are very welcome. However the setting of the standard at current levels is poor. The Games are being billed as the most sustainable Olympics ever. The legacy should retain that statement. A 50% maximum car parking does not deliver this. It would be more appropriate to produce a non-car dependant site.
- 4.135 With this in mind a condition must be place on the permission that seeks to limit the car parking on site for residents to 25% maximum. This will not only increase the sustainability of the site, but will help lower congestion during event times at the legacy venues. Car parking allocation should be provided in those areas with the lowest PTAL. Those with higher PTALs should have no parking provided and be Car Free developments.
- 4.136 Car clubs, cycle sharing and car pooling schemes must be set up to mitigate this. This is mentioned in further detail later in the Travel Plan.
- 4.137 In addition residential service bays for deliveries and repairmen should be included in proximity to developments.
- 4.138 There is no mention of electric recharging points for vehicles in any residential development. This is not mentioned for any parking during Games or Legacy, whether office, residential or venue.
- 4.139 It is recommended that the above measures be secured through relevant planning conditions detailed as follows:
- Car parking on the site in Legacy shall be provided to the London Plan standards (this would require no car parking for legacy venues other than for specialist/disabled service parking). Alternative methods of transport in an around venues must be explored.
 - Prior to the operation of the first venue in legacy a ticketing strategy must be prepared to encourage visitors to the site to use public transport.
 - The parking standards for the residential legacy properties within the Olympic Application boundary must not exceed a maximum of 25% of residential dwellings having a car parking space.

- All parking provided on site must provide electric recharging facilities in at least 50% of vehicle parking spaces provided.

4.140 In general the improvements to the travel plan are welcomed. It is considered that there must be more attention paid to the legacy approach. With this in mind, any approval given should be restricted to approving only the Travel Plan up to Games Operational phase and all travel Plans for Legacy should be confirmed and re-appraised at the time the Legacy masterplan framework application is submitted.

Issue 6: Other

Retail, Leisure & Sport

Initial View of London Borough of Tower Hamlets

4.141 It is recommended that funding to ensure the ongoing community use of the legacy facilities is secured either via Section 106 or other capital sources.

London Borough of Tower Hamlets Revised Recommendation

4.142 It is considered that the applicant has not made a specific response to this matter in the consultation section of the additional information submitted in the application. This is disappointing and could be taken to indicate that there is no commitment from the ODA to ensure that the world class sporting and leisure facilities retained in legacy would be made readily available to London Borough of Tower Hamlets residents as well as to residents to other surrounding communities.

4.143 In discussions with the applicant it is advised that Sport England is one of the main consultees on the business plan for the legacy venues.

4.144 It is recommended that a Section 106 or other relevant agreement seek to secure the use of legacy sporting and leisure facilities and the Olympic park thus created through the permission by local residents. Access to legacy venues and facilities such as the main stadium and aquatics centre could be provided at a reduced rate to ensure that all members of the surrounding community have the opportunity to participate in leisure and sport and indicates a recognition of the inconvenience that the local community will have to endure during construction phases and the future operation of the venues.

4.145 In relation to park management/maintenance it is advised by the applicant that it is the intention to prepare and implement a Park Management Plan prior to the opening of the test events for the Olympic Games. It is recommended that this park management plan be submitted to and approved by the ODA prior to games operation phase. This plan would extend on into legacy and the life of the park in perpetuity.

Code of Construction Practice

Initial View of London Borough of Tower Hamlets

4.146 The London Borough of Tower Hamlets would expect full compliance with the council's construction code of practice.

ODA Response

4.147 Under Regulation 19 of the EIA regulations the ODA has submitted further information on the mitigation measures set out in relation to the Code of Construction Practice. (Vol 8). This includes measures to avoid, minimise and manage any unacceptable noise and vibration

effects along with specific information concerning construction and operational noise.

London Borough of Tower Hamlets Revised Recommendation

- 4.148 The London Borough of Tower Hamlets considers the Code of Construction Practice to be generally acceptable. The mitigation measures detailed are welcomed.
- 4.149 It is recommended that the code of construction practice and mitigation measures proposed is secured through relevant conditions of the planning permission.
- 4.150 In addition the following conditions in are recommended in relation to the Code of Construction Practice:
- Prior to commencement of construction a full list of enforcement measures that will be served to construction partners not adhering to the Code of Construction Practice should be submitted and approved by the Joint Planning Team.
 - As part of the Environmental Management Plan (EMP), further submit:
 1. A fleet management plan detailing construction vehicle types. This should include a schedule of all plant and equipment (including on-road vehicles) to be used. It should also include details of after-treatment technology applied to off-road mobile machinery.
 2. The Construction Transport Management Plan should also assess the effects of construction traffic on traffic flows on local roads within LBTH.
 3. The Construction Transport Management Plan should be submitted to LBTH Environmental Health (Air Quality Officer) for perusal.
 - The Pollution Incident Plan should highlight contact details for a site Environmental Manager for each phase of development, who can be contacted in the event of public complaints received by this department.
 - All commercial road vehicles used in the construction/demolition phase should meet the applicable European Emissions Standards at the time of construction and should not only comply with Euro 3 standards as mentioned in the current CoCP.
 - “Dust Control” – (i) CoCP or EMP details of dust depositional monitoring (methodology, locations etc) should be agreed with London Borough of Tower Hamlets. (ii) A Demolition Method Statement must be submitted prior to the commencement of works.

5.0 CONCLUSION

- 5.1 All other relevant policies and considerations have been taken into account. The ODA Planning Decisions Team should consider the views and issues of the London Borough of Tower Hamlets set out in the Observations Letter to the ODA PDT which is to follow the consideration of this report by the Strategic Development Committee.

Appendix A

Amended Description of Proposals

The development proposed within the Site Preparation Planning Application has not been revised from the February 2007 submission.

The Olympic and Legacy Transformation Planning Application is for development in connection with the 2012 Olympic Games and Paralympic Games and Legacy Transformation. The amendments to this description from the February 2007 submission are highlighted in bold.

Purposes for the Games, involving:

- Earthworks to finished levels,
- Sports, leisure and entertainment venues within class D2, (including ancillary service areas);
- Olympic Cauldron;
- Open space and circulation areas (involving soft and hard landscaping and associated structures);
- Under and over bridges;
- Utility structures (including wind turbine, pumping stations, electricity substations, telecommunication masts, Channel Tunnel Rail Link cooling box, an Energy Centre (including a Combined Cooling and Heating Plant and biomass boilers)); Construction of buildings for use within classes A1, A2, A3, A4, A5; and
- Construction of buildings for use as the International Broadcast Centre / Main Press Centre (including B1 / B2) and Multi Storey Car Park;
- Erection of a perimeter enclosure for the period of the works; and
- Temporary coach parking areas.

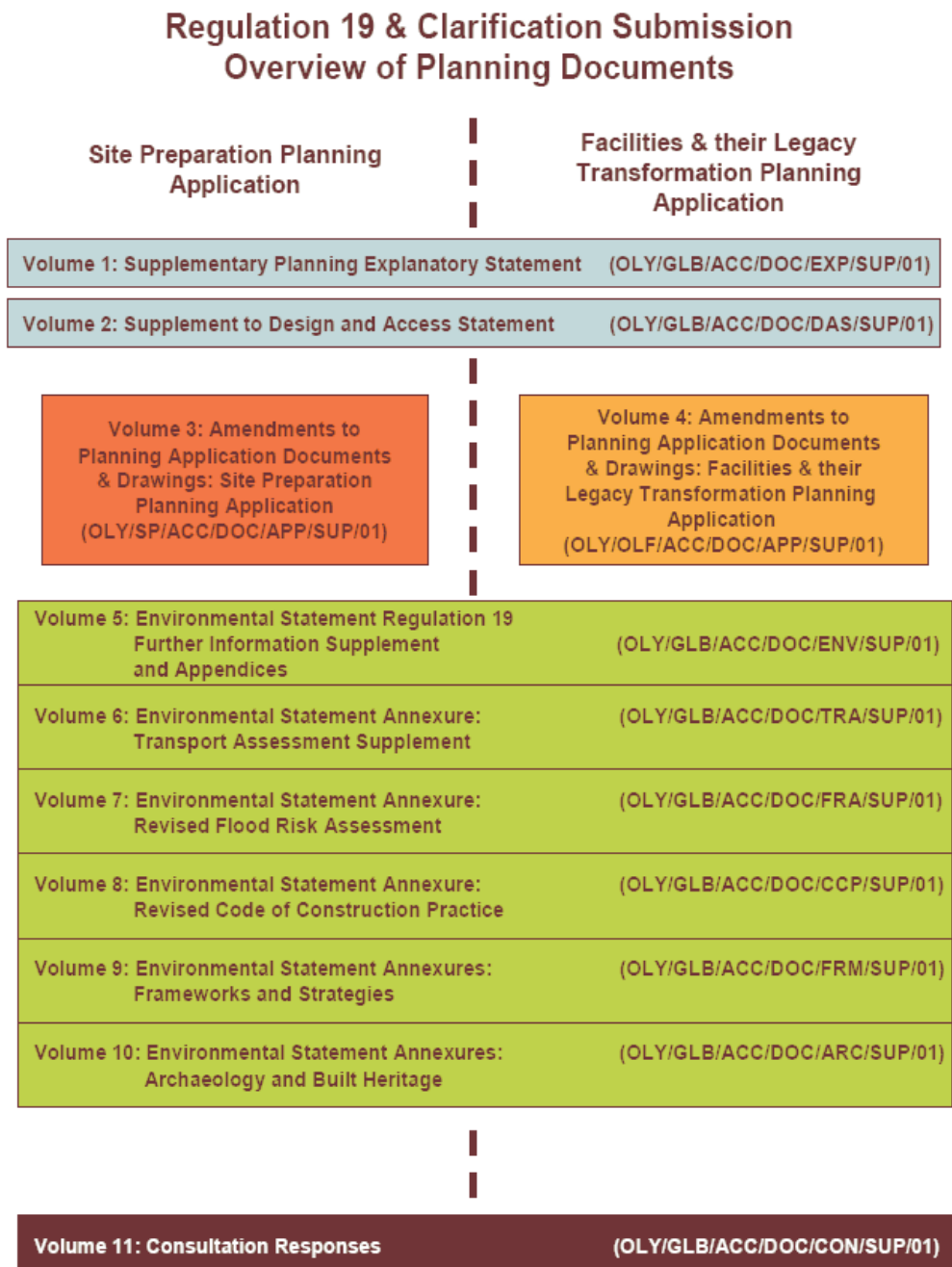
In the period following the Games, the Legacy Transformation Phase involving:

- Reconfiguration of road network to form Legacy distributor and local roads, cycleways, pedestrian footways and ancillary parking areas;
- Dismantling and reconfiguration to form buildings for use within classes B1, B2 and B8;
- Partial deconstruction, demolition, dismantling and construction of venues to form legacy sports, leisure and entertainment venues, servicing facilities, car parking, vehicular access and ancillary works for use within classes D1 and D2; and of over and under bridges and buildings and structures (including telecommunication masts);
- Engineering earthworks involving reconfiguration of levels and the laying out to provide permanent public open space (including outdoor sports facilities, play facilities, cycle circuit and ancillary facilities), allotments and sites for future development; and
- Erection of perimeter enclosure.

Appendix B

Documents Submitted with the Regulation 19 & Clarification Information

Figure 2: Overview of Planning Documents for Regulation 19 & Clarification Submission



Appendix C

Copy of Letter to the ODA PDT (March 2007) and Strategic Development Committee Report (15th March 2007) Containing the Initial Recommendations of the London Borough of Tower Hamlets