

## **Written information received by the Transport Committee for its work on 2012 transport**

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Our  
reference:  
Your  
reference:  
Date: 20 February 2012

Dear Laura,

### **London Assembly Transport Committee follow up work on 2012 transport**

Thank you for your email of 20 February 2012. London Councils once again welcomes the opportunity to contribute to the Committee's work on 2012 Transport. We are pleased to see the Committee continuing to scrutinise London's preparedness as the Games draw ever closer.

Work on planning for the Games has continued apace since we last presented evidence. As requested, I will outline below those areas where progress has been made and those issues which we consider to be outstanding or of cause for concern.

### **Travel Demand Management**

We are, on the whole, pleased with the progress that has been made on the Travel Demand Management workstream. TfL, working with LOCOG, has published detailed information to enable Londoners to plan around the Games. However, we remain somewhat concerned that the needs of the Games are still taking precedence over the needs of residents and businesses. For example, there are many businesses who will struggle to receive deliveries during the night, for a variety of reasons (chiefly a lack of storage space and the cost of employing staff overnight). Some good work has been done in this area – notably the Code of Practice for Night-time Deliveries – but many uncertainties remain.

### **Travel Hotspots**

TfL's production of the 'hotspot' maps and tables have been of great use in helping local authorities, businesses and the travelling public in planning their Games-time journeys. We still have concerns about some of the possible 'knock-on' effects. For example, people will not queue for hours for an Underground train – they will seek alternative means of transport. While the impact on the Tube has been explicitly modelled, the specific impact on the bus network is less understood. We would like to see broader planning (including contingency planning) for buses.

## **Local Area Traffic Management and Parking Plans**

We have repeatedly expressed our concerns about the delayed Local Area Traffic Management and Parking Plans (LATMPPs). These crucial documents have been severely delayed. They will have an impact on provision of public services, deliveries and servicing, as well as parking and traffic. LOCOG have been extremely slow to produce the plans (they were expected over a year ago). Local authorities, businesses and hauliers are all relying on these plans to help them deliver goods and services. While most plans are now available, the opportunity for public consultation is limited.

There are still many unanswered questions around how the LATMPP measures will be deployed on-street. We do not know how the vehicle access checkpoints will work, and we are extremely concerned that LOCOG's proposed virtual permit system could be costly and ineffective. Time to develop and test these processes is running out. There is also a very real risk that some will not be in place in time for the Games, particularly if a public inquiry is required.

## **Use of the ORN**

We would repeat the point that Games sponsors should not be permitted to use the Games Lanes. This is particularly significant in light of recent reports that NHS vehicles will not be allowed to use the lanes unless travelling under blue light. Such vehicle movements include blood, organ and tissue transfers, delivery of critical supplies (e.g. oxygen) and urgent (if not critical) movement of patients. We simply cannot see a justification for the movement of sponsors to take precedence over these journeys. Recent reports of corporate hospitality packages being sold with access to Games Lanes and parking also underline the degree to which sponsor access to Games Lanes is open to abuse.

## **Identification of the ORN**

We raised the specific issue of 'badging' the ORN at the last call for evidence. We remain concerned that it will not be made clear on-street what roads form the ORN, other than the minority of roads which include a Games Lane. Again, TfL's compliance strategy appears to rest heavily on the deterrent value of a £200 penalty. Failing to show clearly where that penalty applies appears to undermine that strategy. When this was last discussed by the Committee, the ODA confirmed that the ORN *would* be badged, but it transpired they were speaking at cross-purposes, and that this was not the case. We still strongly recommend that TfL should deploy on-street signs of some sort along the ORN to maximise the deterrence achieved.

## **Inclusion of the Alternative ORN**

We concur with TfL's intention to minimise the impact of the ORN wherever possible. We have now reached an agreement with TfL over when the AORN would have a higher-rate parking penalty applied. This will be only on those days when the core ORN will be closed for road events. In other words, motorists will be able to find out in advance when this is the case. We are confident that this is the fairest and most easily-understood approach.

## **Vehicle removals on the ORN**

As you will be aware, TfL are working in partnership with a number of boroughs on enforcement of those sections of the ORN which fall on borough roads. We have been in discussions with TfL for some time on how to make enforcement on the ORN legal, fair and robust. Since we last submitted evidence, TfL has now changed their strategy (which we applaud) but have left it so late that have yet to identify the enabling infrastructure.

The strategy, as we understand it, is now as follows: vehicles parked on the ORN will be towed away as they will cause an obstruction. Towed vehicles will be removed to a pound, where they can be kept securely until such time as the owner comes to collect them. This is a legal, robust and fair system. The problem is that TfL does not have a vehicle pound of its own. They are relying on boroughs to grant use of their pounds for vehicles towed by TfL trucks. At the time of writing, very few of the boroughs asked felt they would have any available space to share (given the pressures on local roads arising from the Games). There are also liability issues relating to damage caused in transit, handling payments and releasing the vehicle to the owner. While these liability issues should all be resolvable, the lack of pound space remains a key concern.

We have made several recommendations to TfL, including:

- creating a temporary pound (possibly on one of their own sites like a bus depot)
- using low-loader vehicles (a strategy employed by the police during major events)
- bringing a decommissioned borough pound back into use (we have supplied a list)
- contacting non-ORN boroughs to ask if their pounds may be used

TfL has procured 68 removal vehicles to keep the ORN clear. These vehicles can reasonably be expected to tow one vehicle every three hours (assuming they work to capacity). The ORN will be operating for 18 hours per day. It is therefore reasonable to assume TfL will need space for at least 408 vehicles per day *if motorists choose to park in contravention on the ORN*. If this figure of 408 vehicles seems excessive, it brings into question the need for 68 removal vehicles to be in use during the Games. The cost of providing the vehicles may be better spent on other measures, like increasing the frequency of buses on key routes to mitigate the overcrowding on the Tube.

## **Parking & Traffic Penalties**

At the time of writing, London Councils' Transport & Environment Committee (TEC) has agreed a proposal to increase parking penalties (to £200) and removal charges (to £300) around the venues in the Park and River Zones for the duration of the Games. Concurrently, TEC, TfL and the ODA have all agreed proposals to increase parking penalties on the ORN to £200 during Games-time. Approval from the Mayor is needed before these proposals can be sent to the Secretary of State for Transport for ratification. If, by the time of the Transport Committee meeting, the Mayor has not made a decision, we would urge the Committee to encourage him to do so.

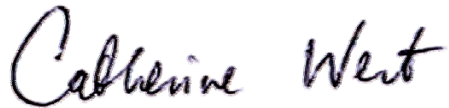
## **Conclusion**

TfL and other agencies have made great progress in planning for the Games. Their communications with boroughs have improved, both in terms of quality of information and frequency of contact. However, there remain a handful of issues which are still cause for concern. Badging the ORN and making appropriate provisions for vehicle removals on these roads are critical to the success of the network (and so the Games). We would also repeat the concerns about the lack of planning for the vehicle permits for the LATMPP

areas. LOCOG must make very fast progress in this area to implement a workable system in time for the Games.

Again, thank you for the opportunity to contribute to this debate. We would be happy to attend future meetings if that would be useful.

Yours sincerely,

A handwritten signature in black ink that reads "Catherine West". The script is cursive and fluid, with the first name and last name clearly distinguishable.

Catherine West  
**Chair, London Councils' Transport and Environment Committee**

## **Road Haulage Association comments, 23 February 2012**

We are no further forward with regard to the night time delivery ban. Any relaxation would be welcomed.

Other issues that the industry is concerned about currently are:

1. Operation of the alternative route network.

On the basis that if needed the alternative network could become live immediately then what would be the situation of a driver who had commenced a delivery on the highway at the time it was not a live part of the ORN that is now ORN and subject to the £200 fine for being parked on the route. Will enforcement authorities provide a period for the delivery to be completed before issuing the fixed penalty? How will the driver be aware the route has been indicated as Live ORN.

2. There is some confusion with regard to the use of vehicles with advertising and logos. There is a ban on non authorised advertising within Olympic venues and the need for plain unliveried vehicles. However there is uncertainty as to vehicles operating within London close to the Olympic venues with regard to their use of logos and advertising. The documents provided so far do not fully clarify the position. Details like this in an easy to understand format would be appreciated

**JOHN F HOWELLS CMILT**

*Regional Director Southern & Eastern Region*  
Road Haulage Association Ltd

## **1. Introduction**

- 1.1 Sustrans is the charity that's enabling people to travel by foot, bike or public transport for more of the journeys we make every day. Our work makes it possible for people to choose healthier, cleaner and cheaper journeys, with better places and spaces to move through and live in.<sup>1</sup>
- 1.2 Sustrans acts simultaneously on the delivery of practical projects which help people to choose more active and sustainable modes of transport and to encourage government to improve the conditions for those people who have managed to leave the car behind.
- 1.3 Sustrans sees the 2012 Games not only as an opportunity to showcase London's successes for sustainable transport but also as a chance for London to see a long-lasting change in the way that people think about how they get from A to B.
- 1.4 Walking and cycling should and will be key parts of the complex transport system that will operate during the 2012 Games and both options will offer Londoners and visitors the most pleasant and efficient ways to move around and see the capital. Various iterations of the transport plans and their supporting structures and processes and ongoing inquiries and investigations have allowed us to voice any major concerns at early planning stages. Most of these have been answered. However, a number of issues continue to concern us regarding the approach to and support for walking and cycling during Games time.
- 1.5 Our response will go into more detail on each of our remaining concerns regarding the transport plan for the Games, limited to:
  - Mode share expectations – for walking and cycling to the Games are disappointingly low – in many cases, the mode share expectation is lower than the existing mode share in the boroughs hosting the Games which seems a missed opportunity to build on an existing culture of active travel.
  - Background travel – the alternatives for work force and other background fail to offer much in the way of mode shift to active travel focussing instead on altering working times and locations.
  - The active travel programme – a fantastic programme which pulls together the multitude of events and projects which encourage active travel to the Games but there are fairly intangible comments in the transport plan about publicising the active travel options.
  - Cycle parking –the getting to the Games site continues to fail regarding cycling options to the Games. As people increasingly start to think about planning their journeys it is vital that this error is remedied.
  - Walk all the way – is not offered as an option as per the TfL normal journey planner. As many people travelling to the Games would like to walk for the whole journey, it is vital that this option is offered when journey planning.

## **Mode share expectations**

- 2.1 The many agencies who have come together to develop the transport plans for the 2012 Games have admirably designed a system which aims for 100% of spectator travel by sustainable means (walking, cycling and public transport). The transport plan supports that aim effectively, largely by placing absolute restrictions on accessibility of Games venues by private motorised transport and through the automatic provision of a public transport ticket with every Games ticket.

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<sup>1</sup> These comments are drawn from Sustrans' written submission to the Transport Select Committee

- 2.2 The mode share expectations for the Olympic and Paralympic Games are therefore between 70% and 80% public transport (depending on venue and event type) no more than 3% for walking and no more than 2% for cycling. (See table from the transport plan pasted below).

Figure 7.9 Typical mode share planning assumptions for the Olympic Park, River Zone and Central Zone

Zone	Rail, London Underground and DLR	Park-and-ride	Coach	Walk	Cycle	Local bus	Taxi	River services
Olympic Park	78%	7%	7%	2%	2%	2%	1%	1%
River Zone (excludes ExCeL)	80%	0%	5%	2%	2%	5%	1%	5%
Central Zone	82%	0%	5%	3%	2%	5%	2%	1%
ExCeL	85%	4%	4%	2%	2%	2%	1%	0%

Figure 7.10 Paralympic Games typical mode share planning assumptions for the Olympic Park, River Zone and Central Zone

Zone	Rail, London Underground and DLR	Park-and-ride	Coach	Walk	Cycle	Local bus	Taxi	River services
Olympic Park	70%	7%	14%	2%	2%	2%	2%	1%
River Zone (excludes ExCeL)	70%	0%	10%	3%	2%	8%	2%	5%
ExCeL	73%	3%	15%	2%	2%	2%	3%	0%

- 2.3 Although the figures in the above table do not include non-Games/background traffic, it is disappointing to note that the expected levels of walking and cycling mode share are so low despite the active travel culture of the host boroughs.
- 2.4 The six host/legacy boroughs have background combined resident mode shares for walking and cycling of between 29% and 46% - far higher than the 4-5% combined expectation for Games traffic in the same locations (see table pasted below<sup>2</sup>).



Table 5.3 Basic travel demand and travel behaviour indicators – Legacy boroughs.

Borough/area	Resident average trip rate (5 yrs) <sup>(1)</sup>	Resident average trip rate (3 yrs) <sup>(2)</sup>	Trip origin mode share public transport (%) <sup>(3)</sup>	Resident mode share public transport (%) <sup>(4)</sup>	Resident mode share walk/cycle combined (%) <sup>(5)</sup>	Households without access to a car (%)
Barking & Dagenham	2.3	2.1	26.2	29.2	28.9	46.6
Greenwich	1.9	1.8	23.8	27.9	29.6	38.9
Hackney	2.1	1.9	34.3	38.6	44.0	64.4
Newham	2.5	2.4	28.2	30.9	39.5	60.1
Tower Hamlets	2.3	2.3	34.7	32.2	45.9	63.3
Waltham Forest	2.3	2.0	26.1	29.7	33.4	45.2
Legacy total/average	2.2	2.1	29.3	31.5	37.6	53.3
Geographic comparison set 1 <sup>(6)</sup>	2.4	2.4	29.9	31.5	32.5	49.1
Most similar comparison set 2 <sup>(7)</sup>	2.6	2.5	27.9	29.3	33.1	42.8
Non-Legacy boroughs	2.6	2.6	27.2	26.3	32.4	40.7
Inner London	2.6	2.5	35.8	33.7	40.7	57.7
Outer London	2.5	2.5	20.6	22.7	28.2	32.4
Greater London	2.6	2.5	27.5	27.1	33.2	42.9

Source: TfL Strategy and Planning, LTDS Survey.

(1) Average number of trips made per person per day, 5 years old or greater and resident in area - average over period 2006/07 to 2010/11 (5 years).

(2) Average number of trips made per person per day, 5 years old or greater and resident in area - average over period 2008/09 to 2010/11 (3 years).

(3) Percentage of trips made by bus, Underground, Rail and DLR/Tramlink, as distance-based main mode. Residents of Greater London only. Trips originating in specified area only, average over period 2008/09 to 2010/11 (3 years).

(4) Percentage of trips made by bus, Underground, Rail and DLR/Tramlink, as distance-based main mode. Residents of Greater London only. For trips by borough of residence, average over period 2008/09 to 2010/11 (3 years).

(5) For trips by borough of residence. Greater London residents only average over period 2008/09 to 2010/11 (3 years).

(6) Geographic control group consisting of Lambeth, Wandsworth, Hammersmith and Fulham, Merton, Sutton, Kingston upon Thames average over period 2008/09 to 2010/11 (3 years).

(7) Control group consisting of Southwark, Lewisham, Haringey, Islington, Hounslow, Enfield average over period 2008/09 to 2010/11 (3 years).

- 2.5 The majority of Games visitors will be starting their journey to events within London (see map pasted below from the 2012 Transport Plan). The public transport system will be running at if not over capacity. As such, the transport planners should have modelled in a greater mode share for walking and cycling in order to both match or move closer to existing local transport behaviours and minimise the potential for disruption on the public transport system.

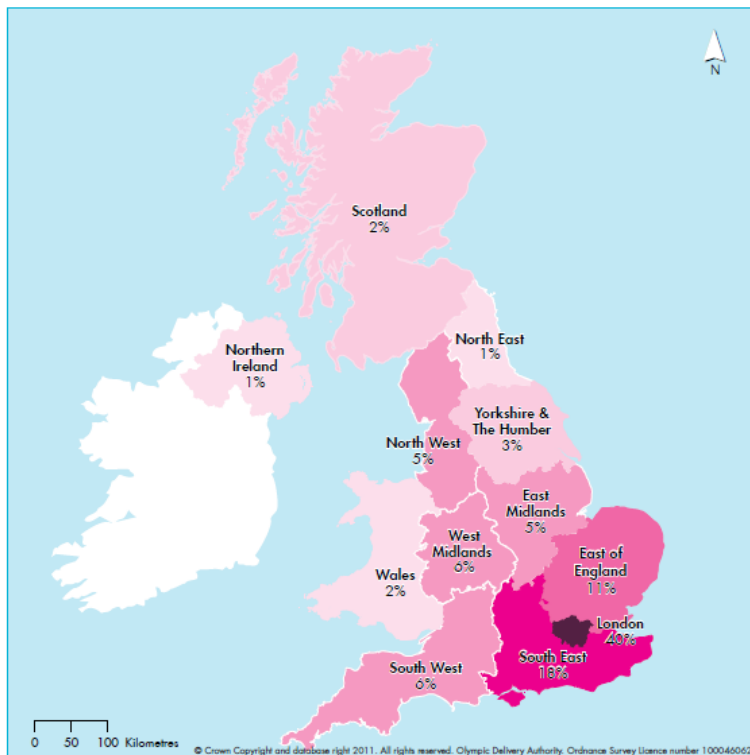


Figure 7.6  
Predicted distribution of home  
locations of UK spectators  
attending London venues  
(Day 7)

- 2.6 As the mode share expectations for walking and cycling are so low, and as the transport ticket provided with event ticket will act as a disincentive to walking and cycling, many people will opt to use an overcrowded public transport system to access Games venues. This will result in a higher number of unpleasant, delayed, stressful journeys to Games venues. In addition, by not working towards higher mode shares for walking and cycling, the transport plan fails to alleviate the impact on background transport demand during Games time.

## Background travel

- 3.1 In their last inquiry into Games time transport, the Transport Select Committee voiced significant concern around the lack of confirmed and evidence-based estimates regarding overall demand on the transport system during Games time. Since then, the relevant authorities have gone to great lengths to ensure that background demand (non-Games travel) will be reconsidered. Get ahead of the Games<sup>3</sup> is aimed at people travelling during Games time for non-Games reasons. A large part of this programme has included a focus on large employers and travel advice for businesses<sup>4</sup>.
- 3.2 We're pleased to see that mode-shift to walking and cycling for commuter journeys are offered among the range of options (though disappointed to see that they are offered below car-sharing – private motorised transport should not be considered an option at all, particularly at Games time, for anyone who isn't strictly in need of such an option). However, the information available from the website is extremely minimal. There are no immediately obvious links to further information about how to find routes for walking and cycling, where training and support are available and/or how to set up a travel plan for your business. This should be improved in good time for the Games to ensure that the package of measures being brought together by the active travel programme is well-publicised for Games and background transport demands.
- 3.3 Many Londoners will be disappointed that they missed out on tickets to the Games. Cramming into the public transport system with games visitors is unlikely to get them in the spirit of the Games. Encouraging them to walk and cycle and see more of their city might bring them round to the much talked of 'Games Effect'.

## The active travel programme

- 4.1 Sustrans has been working with teams at TfL, LOCOG and other managing and supporting authorities and partners since 2005 to ensure that active travel forms a key part of the sustainability focus of London 2012. The most recent transport plan demonstrates a thorough understanding of collaborative efforts to influence transport plans.

*The key principles used in planning for walking and cycling for London 2012 are:*

- *Legacy: ensuring that a legacy of local and strategic cycle and walking routes and associated infrastructure remains after the Games.*
- *Integration of programmes and modes.*
- *'Hard' and 'soft' measures: hard measures focus on physical infrastructure such as new and upgraded routes, secure cycle parking, and signs and wayfinding systems; soft measures include a programme of awareness-raising initiatives promoted under the Active Travel Programme.*
- *Cooperation and coordination: ensuring a range of stakeholders continue to be engaged in the planning and delivery of walking and cycling activity for London 2012.*

- 4.2 Whilst this is a thorough account of what is required, and whilst direct reference is made to the Active Travel Programme, Sustrans is concerned that the impact of the Active Travel Programme could be undermined by a lack of investment, advertising and awareness.
- 4.3 The Active Travel Programme<sup>5</sup> is, as explained above, a series of soft measures designed to complement the infrastructure which has been put in place to encourage walking and cycling around Games time. The programme is a fantastic demonstration of collaboration across many organisations which pulls together several strands of work which attempt to encourage higher levels of physical activity through walking and cycling during the games.
- 4.4 However, there is no firm commitment within the Transport Plan to advertising, publicity or marketing of the campaign beyond what is already available on the Games Transport site. Sustrans would like to see information about the active travel opportunities included with tickets or advertised to a wider audience than would currently see details.
- 4.5 Additionally, Sustrans would like to see a firm commitment to and resourcing for monitoring the impact of the Games on levels of walking and cycling in London as part of wider legacy efforts. We understand that the monitoring process for this is currently being considered. No Games yet has managed to achieve a health legacy. If London is able to get more people walking and cycling through the Active Travel Programme that should be clearly measured, monitored and recorded both to ensure London learns how best to secure longer term travel behaviour change and for the benefit of future Games' hosts.

## Cycle parking

- 5.1 We're pleased to see that cycling is offered as an option on the spectator journey planner website<sup>6</sup> for the Games. However, the cycling option does not appear to be available as a result of a lack of parking at the venues. The response for all journey enquiries is that "No cycle parking is available on your chosen date or time"
- 5.2 Either the parking for venues is expected to be insufficient and cycling is in reality not an option, or the journey planner is failing to allow for journeys by bike. Whichever the case, this needs to be remedied to ensure that mode share expectations can be met or exceeded.

## Walk all the way

- 6.1 Again regarding the journey planner to the Games, we're concerned that there is no option to walk all the way as is the case on the standard TfL journey planner. This is easily remedied and should be altered without delay.

## Conclusion

- 7.1 Sustrans is pleased to see that the most recent iteration of the Transport Plan for the 2012 Games takes into account and responds to the wide range of concerns which we've raised over the last 6 years. What remains now is a need to fine tune the system and the approach and we hope that this committee inquiry will serve to iron-out the last details. We're aware that some of the detail in this response may seem specific and detailed, but at this stage we require attention to detail to ensure that we can achieve the most sustainable Games ever.

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<sup>1</sup> [www.sustrans.org.uk](http://www.sustrans.org.uk)

<sup>2</sup> TfL (2011) Travel in London 4

<sup>3</sup> <http://www.getaheadofthegames.com/>

<sup>4</sup> <http://www.london2012.com/get-involved/business-network/travel-advice-for-business/index.php>

<sup>5</sup> <http://www.london2012.com/making-it-happen/sustainability/active-travel-programme/about-the-london-2012-active-travel-programme.php>

<sup>6</sup> <http://travel.london2012.com/SJPWeb/Pages/JourneyPlannerInput.aspx>

## **London Cycling Campaign (LCC) written submission, 5 March 2012**

### **Cycling during the Games**

There have been no further developments since the LCC's last submission to the Committee. The LCC's recommendations to ensure a high level of cycling during the Games have not been pursued. The LCC's recommendations, as set out in its previous submission, are listed below.

- A higher target (10-20%) should be set for walking and cycling to Games events.
- Secure (supervised or enclosed) cycle parking to match enhanced cycling targets should be provided at all venues and at all giant screen locations.
- All publically funded events in London in 2011 – 2012 should be required to show a travel plan that includes cycle parking, planned website information about cycling and walking to the event and provision of guided rides/walks where possible.
- The Active Travel programme should be adequately funded.
- Incentives should be considered for spectators who cycle or walk to the Games such as cycle servicing or priority access.
- The Olympic family and workforce should be encouraged to cycle and walk.
- A fleet of freight bicycles should be supplied.
- The Cycle Superhighway 2 to Ilford should at the least be completed.
- There should be adequate signing of potential cycling and walking routes.
- The Cycle Hire Scheme should be extended to the Olympic Park and other venues.
- Cycle hubs should be created at key locations including Stratford Regional Station.
- The ODA and OPLC must agree ambitious targets for the modal share of cycling and walking in the Olympic Park development. These targets should be used to set standards for developers in providing cycle parking/storage and cycle routes.

### **The cycling legacy from the Games**

As far as the Olympic Legacy is concerned there have been two significant developments. The Mayor's Olympic Legacy Supplementary Planning guidance has been put out to consultation and the OPLC has submitted its Legacy Communities Scheme Planning applications. Both these documents suffer from a lack of ambition and specificity as far as cycling is concerned.

Further information about the LCC's position on legacy is set out below. This is drawn from a recent submission to the Transport Select Committee.

1. In summary our position is as follows. The transport legacy of the Olympics is now at a critical stage with the OPLC's Olympic Legacy Communities Scheme planning application under consideration and the Mayor of London's Olympic Legacy Supplementary Planning Guidance yet to be finalised following consultation. At the level of generality these documents aspire to create an area where sustainable transport is prioritised (as is imperative in the context) but on examination in detail they fall far short of what is actually required and possible. Developments that have actually been implemented so far only serve as a warning of potential failure to come. Political impetus is necessary to prevent the sustainable Olympic transport legacy failing.

*Background - an area of high cycling potential and poor achievement*

2. The Olympic site in east London is planned to be transformed into a park approximately the size of St James' Park, surrounded by 5 newly developed "Legacy Communities" with the Olympic village

converted to housing. The scale of the development is huge. It aims for 29,000 new dwellings, with over 59,000 new inhabitants and over 54,000 new jobs.<sup>1</sup>

3. The site is situated within a wider area suffering multiple deprivation, environmental degradation, and an already choked transport infrastructure. In particular the main roads are already over congested and likely to become even more so even without this major development.<sup>2</sup> A significant increase in cycling is necessary to help alleviate these problems.

4. Many studies show that the Olympic Park development is in the middle of a wider area of high cycling potential:<sup>3</sup>

- It is flat.
- It connects to employment/retail destinations within cycling distance, Canary Wharf, the City/Westfield, Stratford City.
- There is a low starting level of car ownership.
- It has a "ring" of trunk routes (A12, A13, A406) diverting through traffic off local roads.
- It has many minor local roads and communities, ideal for creating "living streets".
- There are some excellent nearby off road leisure cycling opportunities.<sup>4</sup>
- It has a good public transport infrastructure which, with cycling and walking, can form a excellent basis for sustainable transport.

5. This cycling potential has been realised to a far greater extent in the Borough of Hackney where cycling issues are taken seriously by local politicians. It has a cycling modal share exceeding 12% of all journeys at peak times . The next door Borough of Newham on the other hand has a modal share which is currently just 2% of journeys to work. While official Newham policies seek to promote cycle use there is little evidence of improved cycling conditions on the ground or political support for such measures.<sup>5</sup> The difference between boroughs illustrates the importance that political support can make, even at local level, to cycling provision.

6. The London Mayor's (modest) target for cycling is 400% between 2001 and 2026, with 5% of journeys being made by cycle by that date. This target can be reached and exceeded more easily if areas that have high potential for cycling growth contribute much higher levels of cycling usage. The Olympic Park development must be one such area as it has the advantage of being developed from scratch. It will also include both new schools and new university campuses, and is situated in an area which already demonstrates unfulfilled cycling potential.

7. Therefore for the Olympic Park development there should be a target of 25% of journeys under 5 kilometres to be made by cycle and cycle parking standards which significantly exceed the existing London Plan standards.<sup>6</sup> Once such targets are adopted then the relevant provision on the ground can be planned for and delivered.

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<sup>1</sup> Olympic Legacy Supplementary Planning Guidance: Infrastructure Delivery Study at <http://www.london.gov.uk/sites/default/files/OLSPG%20Delivery%20Study.pdf>

<sup>2</sup> Olympic Legacy Supplementary Planning Guidance: Integrated Impact Study at p 53( present situation) and p73 (ordinary London Plan projection) at <http://www.london.gov.uk/sites/default/files/OLSPG%20Draft%20IIA.pdf>

<sup>3</sup> "Delivering the Benefits of Cycling in Outer London" prepared by TfL, London Councils and others, Feb 2010, see figs 3 and 6; Olympic Legacy Supplementary Planning Guidance: Integrated Impact Study at p 53

<sup>4</sup> The Greenway from Beckton to Victoria park, the Lower Lea Fatwalk from Bow to the Thames, the River Lea Towpath from Bow to Hertford, Victoria Park and Epping forest.

<sup>5</sup> E.g. (1) It spent over £9m of Thames Gateway money to develop Stratford High Street (the A11), a key route which runs directly south of the Olympic site, forming one of only two road links from Newham westwards to the City) without making adequate cycle provision for which there is more than adequate opportunity.(2) It has blocked Cycle Superhighway 2 (paid for by TfL who were also offering financial sweeteners) passing though the north of the borough (including Stratford High Street), right past the Olympic site. (3) It has refused to become a Bicycling Borough, promoted by the Greater London Authority to increase cycling in outer London boroughs, on the grounds that there was insufficient time to apply (which did not seem to trouble the 13 Boroughs that did become Bicycling Boroughs). It thus excluded itself from a considerable pot of funding (4) Its flagship cycle route, the Greenway has disproportionately restrictive cycle barriers.

<sup>6</sup> Even the London Plan itself recognises that its own cycle parking standards are inadequate.

8. The aspiration for the Olympic transport legacy to boost to sustainable transport in the east London area has been on the table since at least 2009.<sup>7</sup> However, the many outstandingly poor examples of very recently installed cycle provision in the area starkly demonstrate the wide gap between fine words in planning documents and what is actually put in place. Therefore all plans must be backed by concrete proposals that are effective in ensuring that both public authorities and developers really do engage with those aspirations and deliver high grade facilities not poorly designed or poorly implemented ones.

9. Three examples (from the many available) of outstandingly poor facilities will illustrate:



- The inadequately signed dark grey strip in the above photograph purports to be a two way cycle lane, recently built by Newham Council on the dangerous Stratford gyratory, running straight into and from a major bus stop. There is no chance that this will be used by cyclists or make any meaningful contribution to cyclists safety. It is a waste of money.



- This is a cycle lane on the periphery of the Westfield shopping centre. The care devoted to the 4 lane carriageway contrasts starkly with the cycle lane. The developers and the local authority clearly consider that signposting empty car parking spaces is more important than cyclist safety.
- Even in the Olympic Park itself a bridge intended for cyclist on a planned key east- west commuter cycling route has been approved by the ODA planning authorities even though on one side there is no ramp, just stairs and a lift.<sup>8</sup>

### *The Legacy Communities Scheme*

<sup>7</sup> E.g. ODA's 2009 "Olympic Transformation - Olympic Parklands and Public Realm Design and Access Statement."

<sup>8</sup> Bridge HO10 in the Olympic Park Plans.

10. This planning application<sup>9</sup> was submitted in September 2011 and has yet to be determined by the ODA as planning authorities. It sets the framework for development of the Olympic park area through different villages and provides for the overall transport infrastructure. It makes slight tweaks to the transport infrastructure already envisaged in earlier masterplans, but they essentially remain as they have been for several years. Its Sustainability Statement<sup>10</sup> includes the fine aspiration that the development seeks to

*“Promote sustainable modes of transport, and produce a Framework Travel Plan to minimise car use and encourage a modal shift to walking, cycling and public transport”*

11. The Transport Assessment Executive Summary describes the aims of the plan as including:<sup>11</sup>

- *To develop street and movement hierarchies to improve conditions for accessibility and encourage public transport, walking and cycling trips;*
- *To maximise local connectivity and accessibility within and adjoining the site encouraging the use of sustainable modes where appropriate ;*
- *To encourage healthy living by creating a sustainable transport system.”*

Yet in the face of this policy the anticipated impact of the plan is to generate more car trips.<sup>12</sup>

12. The Travel Plan Framework<sup>13</sup> states that promotion of cycling is a primary target of the LCS with a guiding principle that the cycle network throughout the Park should be enhanced. Yet the detail shows a very different picture. The following are a few examples only:

13. The assumed modal shares for cycling (limited to peak hours and therefore artificially inflated)<sup>14</sup> are far too low given that this is an area where cycling is to be prioritised. As we have noted before the targets for this green field site need to be far higher than the pan-London average set by the Mayor (5% modal share by 2026) in order that the Mayor’s average growth figure is met or exceeded. . Thus a an inflated (peak time) 7% modal share applying to f housing and flats is far too low considering that that the existing model share for Hackney already stands at 13% of journeys at peak times . A modal share for cycling of 2% for industry is significantly lower than the 4% level achieved by the construction teams working on the Olympic Park.

14. Even in the more aspirational parts of the Transport Assessment low, or even zero, levels of cycling are anticipated. The following modal splits are forecast<sup>15</sup>:

<i>Destination</i>	<i>Modal share by pedal cycle</i>
Health Centre	0% by cycle vs 39% car
Secondary School	6% by cycle vs 14% car
Primary school	3% by cycle vs 22% car

15. At one primary school in nearby Redbridge a quarter of the children cycle to school, surely this can be matched in the Olympic Park. No reason is given as to why people would not wish to visit the health centre by bike and why 39% of people would choose to drive. An envisaged 47% share of morning trips to nursery school by car is high given that such schools will be located within an area of parkland served by walking and cycling routes.

16. The cycle parking standards proposed are far too low. They imply fewer than one cycle parking space for 20 workers, when Westfield already has a standard of 1 for each 10 employees and Hackney's

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<sup>9</sup> 11/90621/OUTODA

<sup>10</sup> Para 1.7.1.

<sup>11</sup> p 1-2

<sup>12</sup> Summary of Impacts, p 3.

<sup>13</sup> Appendix I to the Transport Assessment

<sup>14</sup> p23 Transport Assessment

<sup>15</sup> p 42 Transport Assessment



cycle to work share is already 13%, as noted above. A standard of 1 space for 10 pupils in schools is too low given the proximity of schools in the Olympic Park to the residential areas (we note that in the Netherlands half of education journeys are by cycle). Equally 1 space per 20 peak time visitors to leisure venues is too low given that these are predominantly sporting venues (including cycle sports).<sup>16</sup>

### *The Mayor of London's Olympic Legacy Supplementary Planning Guidance*

17. The Mayor of London's Olympic Legacy Supplementary Planning Guidance is presently awaiting finalisation following consultation. The fact that it postdates the key planning application is to be regretted.

18. Its premise is that there "needs to be a lasting shift to more sustainable forms of transport and movement such as walking and cycling." This statement is welcome but it needs to be backed up with concrete proposals and clear guidance for developers and local authorities.

19. The current OLPSG undermines its own aspirations for the use of sustainable transport in the following significant respects:

- It fails to include any targets for cycling over and above those of the London Plan.
- It fails to recognise that a step change to sustainable transport is not possible without a change in travel demand, a re-allocation of space to more sustainable modes and a target for reducing motor traffic. On the contrary it seeks to "maintain current and future performance of the road network."<sup>17</sup>
- It omits some obvious easy winners in terms of cycle provision and connectivity with the local area;<sup>18</sup>
- It fails to ensure that there be sufficient space around Olympic legacy venues which would be available for use as temporary cycle parking for major events.
- It fails to prescribe a 20mph limit is what is primarily a residential and leisure zone.
- It fails to prescribe the highest standards of cycle facility provision, or cycle parking provision, that could help to deliver Dutch levels of cycle usage

Arnold Ridout

Co-ordinator, London Cycling Campaign 2012 Working Group

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<sup>16</sup> p17 Transport Assessment

<sup>17</sup> Section 2.C.

<sup>18</sup> Such as:

- The completion of Cycle Superhighway 2 which was planned by TfL to run immediately to the south of the Olympic Park but has been blocked by Newham Council;
- Retaining the bridge temporarily constructed for the Games which goes over Stratford High Street and links sections of the Greenway (an off road route which runs through the Olympic Park and provides connectivity to the south);
- Removal of the Stratford Gyratory system; and
- The poor bridge (HO10) on the key cycle commuter route over the River Lea, already mentioned.

## **Additional comments from London Cycling Campaign, 12 March 2012**

### **Path closures**

We heard last week that the towpath along the River Lea to the west of the Olympic Park is to be closed from May until September. This was one of the designated, and upgraded, walking and cycling routes to the Games (marked on the new 2012 cycle route map) and was supposed to act as the diversion for cyclists and walkers when the popular Greenway route from Wick Lane to the View tube is closed in May. This “double whammy” closure of both routes means cyclists and walkers will be forced to use busy roads, including Bow roundabout to reach their destinations. It also means that the award winning and costly towpath bridge under Bow roundabout (finished in time for the Games) will stand idle instead of being well used during Games time as was originally intended. The vital section of towpath from Wick Lane to Bow Roundabout does not even adjoin the Olympic Park so the closure is inexplicable.

### **Cycle Parking at Games Time**

While secure cycle parking is being provided in Victoria Park (west), and the North and South Plazas there is currently no provision on the East side of the Park which means cyclists coming from this direction will have to negotiate the Stratford Gyratory to reach the South Plaza. A suitable location needs to be provided in the area near to Park entrance by Westfield’s or potentially LOCOG could release cycle parking spaces it has access to in the Westfield’s car park which are currently not accessible at Games time.

### **Olympic Park Legacy Provision.**

The good news is that the OPLC says that plans for cycle parking provision have been improved and that they will provide for up to 20% of employees and visitors to Park destinations (this needs to be verified). They also say that most pedestrian crossings will be single stage and an additional off-carriageway cycle track will be provided along a section of Temple Mills Lane. It is welcome that, on paper, there is a network of cycle routes within the Park.

The bad news is that the standards for routes within the park are well below those advocated in the London Cycle Design Standards and connections to cycle routes and roads outside the park remain especially poor. In particular all the off-carriageway cycle tracks within the park are only on one side of the road which will create crossing problems and delays at junctions; and the widest cycle lanes will be 1.5m wide which is the minimum (not the maximum) advised in the LCDS. While the planners say 20 mph is their design speed residential areas some roads like Waterden Road, Warton Road, Carpenters Road and the Loop Road passing through the Park will have higher speed limits and, under present plans, sub-standard cycle provision or no cycle provision (Warton Road, southern Loop Road) . We have yet to see specific plans for safe routes for children riding to the schools in the Park.

As far as we are aware there is no specific target for the modal share of cycling in the park. The OPLC talks of an aspiration to 5 to 7% of journeys at peak times by 2026. The comparable statistic for Hackney residents in 2009 was 13% and cycling has grown by an average of 6% per annum since then. The problem with a low target is that routes are being designed around such a target and this may result in a (self-fulfilling) outcome that does not meet the potential of this exceptional site

New roads in the Park area set some very poor examples. The cycle lanes installed on the roads around Westfield’s are so poorly designed and implemented that they have been a subject of ridicule. Street signs within cycle lanes (advertising the car park), new concrete cobbles in cycle lanes, multi stage crossings with pedestrian conflicts, stop signs at minor drive ways, a cycle lane that ends in the middle of a roundabout, a new one metre cycle lane are among the brand new design or implementation errors. The latest additions include a cycle track with both cobbles and street signs in the middle and cycle parking that effectively is not accessible to women. While the OPLC has no responsibility for these roads, or the parking, they serve as a warning of what could happen if best practice standards are not followed.

**Connections**

The OPLC is not directly responsible for connections from the Park to the surrounding area but its brief does include interconnectivity. OPLC appears to be aware of the poor links in cycle routes beyond the Park notably to the South, East and North East. These will remain very significant barriers to cycling unless all local highway authorities co-operate. Access from Stratford Centre to the Park is particularly poor and the single route into both the Park and Westfield's, along Alma Street, has no cycle provision despite this being a busy road. Preceding Alma Street is a poor section of shared pavement.

Stratford High Street remains a missed opportunity given that it is a very wide road and that it provides an ideal entrance (at the Greenway) to the Park. It currently has no provision for cycle users aside from a few bike boxes. There is an LCC design of what it could be on our website and in the latest issue of the London Cyclist.

**Tom Bogdanowicz**  
**Senior Policy & Development Officer**  
**London Cycling Campaign**

## **Transport for All written submission, 1 March 2012**

Undoubtedly, the Games will make travel more difficult and crowded, with longer waits, for all Londoners. This is even more true for older and disabled Londoners, who may be less able to deal with crowded vehicles or stand for a long time in a queue. However, it is fair to say that these delays and disruptions are inevitable given the scale of the transport mobilisation.

All Londoners will contend with less taxi availability. However, for those older and disabled people who are not able to use buses or trains and rely on Taxicard, the loss of taxi availability will hit harder.

Capital Call have said that they can't guarantee trips during the Games and prices will go up. We urge London Councils to also write to members and inform them if they will be affected by the Games.

We have tried to find out from ComCab about whether fares will rise during the Games. If they do, this will of course affect older and disabled transport users generally (disabled people tend to live in poorer households) and Taxicard users specifically. Taxicard users are already restricted in only being able to travel 3 -4 miles on one swipe (depending on time of day) and higher fares would further restrict the boundary in which they can travel

We are glad to hear from TfL that the Games will be an opportunity for a communications drive to bus drivers, featuring messages about accessibility. This is a good time to remind bus companies and drivers that older and disabled people must be given time to sit down; that bus drivers should wherever possible pull right into the kerb and right up to the stop; and that bus drivers should not be afraid to enforce priority for wheelchairs in the wheelchair bay.

Generally, we are impressed with the provision of accessible transport and Blue Badge parking to get to Games venues. However, there is a real dearth of information in the public domain about how people who are not going to the Games will be affected. While the website [www.london2012.com](http://www.london2012.com) for people going to the Games has a good accessible travel section, there is nothing at all on [www.getaheadofthegames.com](http://www.getaheadofthegames.com) (for people who are not going to the Games) focussed on access.

Furthermore, disabled and older people are disproportionality likely to be offline. I have not had time to do a comprehensive survey, but certainly in Tower Hamlets, Newham and Waltham Forest (both areas which will have disruptions) local people feel that they have not seen offline information about how they will be affected. We would like to see this info put out through bus and train stations, local papers etc. We have tried to remedy some of this on our own website, bringing together info from a variety of sources, and are writing to our offline members to inform them about this.

<http://www.transportforall.org.uk/2012/getting-to-the-games/> and  
<http://www.transportforall.org.uk/2012/avoiding-the-disruption/>

We applaud TfL's efforts in examining the potential of manual ramps at 20 stations, and wait eagerly for confirmation that these can be used, opening up many more potential routes for people who cannot manage the step / gap between platform and train.

We warmly welcome the extra staff laid on during the Games. Staff assistance is essential for disabled and older people to get around. We urge TfL to ensure that older and disabled people will be involved in delivering training to extra volunteers

We warmly welcome the implementation of 'rapid response' teams for fixing broken lifts.

In summary, a lot of work has been done and we get the impression that largely, the relevant bodies are doing their best. However, TfA's key message is that we need a *legacy* of accessible transport. Once the last gold medal has gone out, disabled and older people will STILL need to get to education, work, friends and family, shops, healthcare....London life generally.

It would be a travesty if after the Games the rapid response lift engineer team goes, and we were left having to wait weeks and months for lifts to be fixed.

It would be so wrong if again staff are stripped back so that people needing assistance on and off trains (particularly blind and visually impaired people) or assistance and advice buying tickets or planning journeys are left stranded or having to rely on random strangers.

Perhaps most of all would be a travesty if those 20 stations which become stepfree from gateline to train once again become unusable for those of us who can't manage the gap between platform and train. We urge TfL to look very very hard at keeping manual ramps as a stopgap measure pending the introduction of platform humps etc. While they are by no means an ideal solution (as they cannot be operated independently) they do improve access. Access around London should not just be something for when the eyes of the world are on us – it should be a continuing priority.

Lianna Etkind  
Campaigns and Outreach Co-ordinator  
Transport for All

## **Clean Air for London Campaign (CAL)<sup>1</sup>, 1 March 2012**

### **Executive summary**

This submission relates primarily to the ORN. It summarises the key health impacts of poor air quality and legal issues most relevant to the Olympic Transport Plan.

It highlights the legal requirements to ensure: the particulate matter (PM10) daily and annual mean limit values are not exceeded in London (or elsewhere) in 2012 (e.g. no more than 35 'Bad Air Days' when 12 have been reported already along the ORN at Upper Thames Street); the nitrogen dioxide (NO2) hourly and annual mean limit values are not to be exceeded where they have previously been attained (e.g. in nearby roads); and NO2 levels are not worsened by the OTP and/or ORN where levels of air pollution are currently breaching legal limits (e.g. along much of the ORN in central London).

It highlights admissions in the Strategic Environmental Assessment (SEA) of the Olympic Transport Plan in February 2011 that air quality laws were expected to be breached as a result of the OTP. Also repeated assurances from Transport for London (TfL) since October 2011 that an up to date analysis of the environmental impacts of the ORN would be provided to CAL together with details of mitigation measures. These are still awaited.

Separately, CAL has urged the European Commission (Commission) to launch infraction action against the UK well before the Olympics for breaching the PM10 daily limit value and the NO2 annual mean and hourly limit values in London including along the ORN in earlier years.

This submission makes recommendations for the mitigation of air pollution during the Games.

### **Health impacts of poor air quality**

Ambient or outdoor air pollution comprises particles and gases. The particles, which can comprise anything from tiny droplets to diesel soot and tyre and brake wear, are called 'particulate matter' and classified by their aerodynamic diameter in microns (one-millionth of a metre (µm) which is about one-hundredth of the thickness of a human hair) e.g. PM2.5 and PM10. The gases, which can coalesce and become particles, are mainly NO2, ozone (O3) and sulphur dioxide (SO2).

The WHO says there is little evidence to suggest a threshold below which no adverse health effects would be anticipated for particulate matter or, put another way, there is no safe level of human exposure to it. NO2 is a product of combustion processes and is generally found in the atmosphere in close association with other primary pollutants, including ultrafine particles. NO2 is not 'just' a molecule.

In the Great Smog of December 1952 there were 4,075 deaths in London due to short-term exposure to air pollution with more over the following months. The number was easy to calculate through time-series analysis i.e. the number of deaths peaked about two days after air pollution levels peaked (and didn't fall into a trough thereafter).

It was not until 1995 and 2000 that huge cohort studies (which followed a group of people over a period of time to determine the absolute risk of one or more health impacts) in cities in the United States with different annual mean concentrations of PM2.5 showed the health impact of long-term exposure to air pollution.

Mayor Johnson was the first politician to use advice from the Committee on the Medical Effects of Air Pollution (COMEAP) in 2009 to publish in June 2010 estimates by ward of 4,267 deaths in London in 2008 attributable to long-term exposure to PM2.5. COMEAP lead the way nationally in December 2010 by estimating, using the language used for alcoholism, obesity and smoking, 29,000 deaths in the UK in

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<sup>1</sup> These written comments are drawn from the CAL's submission to the Transport Select Committee

2008 attributable to long-term exposure to PM2.5 at an average loss of life for these people of about 11.5 years. COMEAP and the Mayor's estimates were calculated after eliminating the effect of dozens of other possible risk factors (e.g. educational status as a surrogate for income and smoking) to produce a pure number assuming air pollution is the sole cause of those deaths.

It is fair to point out there were as many early deaths in London in 2008 attributable to long-term exposure to PM2.5 as we thought occurred during the Great Smog of 1952 (due to short-term exposure to air pollution when we knew nothing of the long-term effects).

Separately, top UK lung scientists are warning that a "Summer Smog", like August 2003 or July 2006, could affect Olympic athletes this summer. See The Independent on 16 January 2012: <http://www.independent.co.uk/environment/climate-change/polluted-air-puts-olympic-athletes-at-risk-6290216.html>

These scientists were reported as saying that if we have still hot days, long distance athletes, like marathon runners and cyclists who breathe very hard, could feel a tightness in their chest or experience 'coughs, breathlessness or other problems'. Those with asthma may need medication. Athletic performance could be affected.

It is not just about Olympic athletes though. In the "Summer Smog" of 2003, the Government estimated 46 to 212 early deaths in London attributable to ozone and 85 attributable to short-term exposure to PM10. See: [http://www.cleanairinlondon.org/blog/\\_archives/2009/6/2/4207997.html](http://www.cleanairinlondon.org/blog/_archives/2009/6/2/4207997.html)

Beijing has much higher levels of airborne particles than London but London has the highest levels of NO2 of all 27 capital cities in Europe and levels comparable with those in Beijing before it took action to ensure the success of the 2008 Olympics. [http://www.cleanairinlondon.org/\\_attachments/4979697/CAL%20166%20Nitrogen%20dioxide\\_Beijing%20London%20Olympics\\_Draft%20130112.pdf](http://www.cleanairinlondon.org/_attachments/4979697/CAL%20166%20Nitrogen%20dioxide_Beijing%20London%20Olympics_Draft%20130112.pdf)

The Mayor of London estimated in his Air Quality Strategy that road transport contributed around 80% of PM2.5 emissions in London in 2008 (page 41).

### **Air quality laws**

Air quality laws are breached every day by a factor or two or more along London's busiest roads (and elsewhere) including along the ORN. No other public health or environmental standard is breached on such a large scale with such serious consequences for public health.

CAL has therefore lodged a formal complaint with the Commission about the UK's failure to comply with air quality laws. 'Part one' of the Complaint is that: the UK obtained unlawfully a time extension to comply with the daily limit value for PM10 in London; and, without prejudice to that part of the Complaint, even if a time extension is sustained for the PM10 daily limit value, it was breached in Neasden Lane, London (again) in 2011. 'Part two' of the Complaint is that: the UK breached the annual mean and hourly limit values for NO2 in London and 16 other zones in 2010 (and 2011); and has not applied for a time extension for those zones (i.e. it submitted: plans for 23 zones in September 2011 under Article 22 of Directive 2008/50/EC on ambient air quality and cleaner air for Europe; and plans for London and 16 other zones under Article 23). The Commission has said it may consider the complaint as part of an EU Pilot which would aim to reach a decision within 10 weeks. The full complaint can be seen at: [http://www.cleanairinlondon.org/blog/\\_archives/2012/2/20/5001829.html](http://www.cleanairinlondon.org/blog/_archives/2012/2/20/5001829.html)

These are not new laws. An Air Quality Framework Directive (Council Directive 1996/62/EC), covering ambient air quality assessment and management, entered legislation in 1996. It was followed in 1999 by a so-called First Daughter Directive (Council Directive 1999/30/EC) which set limit values for various pollutants including NO2 and PM10 and thresholds for assessing and managing air quality for the pollutants concerned. Since 1999 therefore, limit values to be attained and not exceeded have

been: an annual mean of 40 µg/m<sup>3</sup> and not more than 35 days over 50 µg/m<sup>3</sup> for PM10 from 1 January 2005; and an annual mean of 40 µg/m<sup>3</sup> and not more than 18 hours over 200 µg/m<sup>3</sup> for NO<sub>2</sub> from 1 January 2010. In other words, the legal limits for PM10 are up to twice WHO guidelines whereas those for NO<sub>2</sub> are aligned with WHO guidelines.

Directive 2008/50/EC entered into force on 11 June 2008. Amongst other things, it set new standards for fine particles (PM<sub>2.5</sub>) to be achieved by 2015 and 2020 and allowed Member States to apply for a time extension to comply with limit values for PM10 and NO<sub>2</sub>. Time extensions can only be obtained if a Member State meets strict conditions including demonstrating that compliance with the limit values will be achieved by the new deadline. The latest deadline possible for PM10 was 11 June 2011. After two failed attempts to obtain a time extension, the UK obtained unlawfully a time extension until 11 June 2011 to comply with the PM10 daily limit value in London after submitting an updated air quality plan to the Commission without consulting the public on it. The good news for public health is that no further time extension or breach of the PM10 annual and daily limit values is allowed in London (or elsewhere).

The latest deadline possible for NO<sub>2</sub> is 1 January 2015. The Government has said it can't (or won't) comply with the NO<sub>2</sub> limit values in London until 2025 and so is unable to meet a basic condition of a time extension i.e. to demonstrate compliance by no later than 1 January 2015. In fact, Mayor Johnson listed 14 measures in his Air Quality Strategy published in 2010 to show that the NO<sub>2</sub> limit values could be complied with by 2015 if Government support was forthcoming. Even if a time extension for NO<sub>2</sub> were to be obtained in future, another requirement of Directive 2008/50/EC is that the limit value plus margin of tolerance must not be exceeded during the period of a time extension i.e. an annual mean of 60 µg/m<sup>3</sup> and no more than 18 hours over 300 µg/m<sup>3</sup>. Annex III of Directive 2008/50/EC emphasises that limit values apply everywhere in ambient air unless: the public do not have access; or all relevant provisions concerning health and safety at work apply.

Air quality laws can be enforced by the Court of Justice of the European Union (CJEU) and in the UK Courts. The former involves the European Commission in a five stage legal (or infraction) process: (i) Letter of Formal Notice (first written warning); (ii) Reasoned Opinion (second and/or final written warning which the UK had reached for PM10 before it obtained a time extension in 2011); (iii) reference to the CJEU requesting a judgement that the Member State is in breach and must comply; (iv) Letter of Formal Notice; and (v) reference to the CJEU requesting the imposition on the Member State of lump sum and daily fines. The Mayor of London has estimated that such fines, which could be passed to London under the Localism Act 2011, could total £300 million per year for each of PM10 and NO<sub>2</sub>. CAL considers that fines (or gaol) are a necessary final sanction in any legal system.

CAL has urged the Commission to launch infraction action against the UK well before the Olympics for breaching the PM10 daily limit value and the NO<sub>2</sub> annual mean and hourly limit values in London including along the ORN in earlier years.

### **Specific legal situation for Olympic Route Network**

We were promised the 'greenest Games ever'. For details please refer to a letter from the Campaign for Clean Air in London to The Rt. Hon. Tessa Jowell MP dated 17 January 2008:  
[http://www.cleanairinlondon.org/blog/\\_archives/2008/3/29/3609596.html](http://www.cleanairinlondon.org/blog/_archives/2008/3/29/3609596.html)

All this matters for London and the Olympics since limit values must not be exceeded once attained and air pollution may not be worsened where limit values are already breached. CAL has sought assurances about the impact of the Olympic Route Network after the Strategic Environmental Assessment for the Olympic Transport Plan admitted in February 2011 *"However, the number of daily mean exceedances at some roadside sites is anticipated to be more than the allowable number of exceedances."* Further details were set out in a letter dated 11 April 2011 to the ODA and Mayor Johnson titled 'Consultation shows Olympic Transport Plan would lead to breaches of air pollution laws' which can be seen at:  
[http://www.cleanairinlondon.org/blog/\\_archives/2011/4/12/4792164.html](http://www.cleanairinlondon.org/blog/_archives/2011/4/12/4792164.html)



CAL wrote again to Mayor Johnson, as Chairman of Transport for London, in a letter dated 12 September 2011 titled 'Plans for Olympic Route Network and Paralympic Route Network remain unlawful and vulnerable to legal challenge through judicial review' which can be seen at: [http://www.cleanairinlondon.org/blog/\\_archives/2011/9/12/4898123.html](http://www.cleanairinlondon.org/blog/_archives/2011/9/12/4898123.html)

CAL has exchanged several letters with TfL since then dated 18 October, 8 December and 21 December (from TfL) and 8 November and 12 December (from CAL). CAL would be pleased to share those letters with the Transport Committee. In essence, TfL has promised in each letter since last October to provide CAL with details of the environmental impacts of the ORN and the mitigation of them. These are still awaited.

The Mayor of London told Val Shawcross AM (Labour) in a written response 3007/2011 dated 12 October 2011 that *"TfL (with Kings College) is currently modelling the potential implications for air quality. Previous emissions analysis was undertaken based on an early iteration of the ODA's traffic mode prior to more detailed design of the routes and associated traffic management."* For details, please see: <http://mqt.london.gov.uk/mqt/public/question.do?id=37933>

King's College London did similar analysis assessing the impact of the removal of the western extension of the congestion charging zone in 2010.

According to the excellent London Air Quality Network at [www.londonair.org.uk](http://www.londonair.org.uk), which is run by King's College London, the number of 'Bad Air Days' along the ORN in Upper Thames Street and Marylebone Road as at 26 February 2012 is 12 and 11 respectively (with six recorded by the 'FDMS' monitor at Marylebone Road). So far in Brompton Road, there have been 61 exceedances of the NO<sub>2</sub> hourly limit value and the NO<sub>2</sub> mean is 89 µg/m<sup>3</sup>. Details can be seen at: <http://www.londonair.org.uk/london/asp/advstatsaqobjresults.asp?site1=CT8&site2=KC3&site3=MY1&site4=MY7&sday=1&smoonth=jan&year=2012&Submit=View>

By 26 February 2011 there had been five Bad Air Days at Upper Thames Street and 15 in Marylebone Road (with 14 recorded by the FDMS monitor at Marylebone Road). <http://www.londonair.org.uk/london/asp/advstatsvariousresults.asp?site1=CT8&site2=MY1&site3=MY7&site4=&statttype=xcreadings&xvalue=50&zunits=none&startdate=01-01-2011&enddate=26-02-2011&submit=View&period=dailymean&species=PM10>

In 2011, the PM<sub>10</sub> daily limit value was breached in Marylebone Road by 20 April. Please see: <http://www.londonair.org.uk/london/asp/advstatsvariousresults.asp?site1=CT8&site2=MY1&site3=MY7&site4=&statttype=xcreadings&xvalue=50&zunits=none&startdate=01-01-2011&enddate=20-04-2011&submit=View&period=dailymean&species=PM10>

This section highlights the legal requirements to ensure: the PM<sub>10</sub> daily and annual mean limit values are not exceeded in London (or elsewhere) in 2012 (e.g. no more than 35 'Bad Air Days' when 12 have been reported already along the ORN at Upper Thames Street); the NO<sub>2</sub> hourly and annual mean limit values are not to be exceeded where they have previously been attained (e.g. in nearby roads); and NO<sub>2</sub> levels are not worsened by the OTP and/or ORN where levels of air pollution are currently breaching legal limits (e.g. along much of the ORN in central London).

### **Mitigation measures**

Olympic Travel Demand Management (TDM) measures typically include: travel capacity creation measures; travel behaviour change/marketing; traffic efficiency measures; traffic bans; and an emphasis on public transport.

Travel behaviour change/marketing measures seek to manage expectations as part of Olympic transport planning and use the 'Big Scare' to influence travel behaviour. The 'Big Scare' refers to the concerns which Games city residents have about travel and living conditions during Games time. It was first used to influence demand during the Sydney 2000 Games. For more details, please see:

[http://www.cleanairinlondon.org/\\_attachments/3609596/CAL%20032%20Monash%20Big%20Scare.pdf](http://www.cleanairinlondon.org/_attachments/3609596/CAL%20032%20Monash%20Big%20Scare.pdf)  
[http://www.clearairinlondon.org/\\_attachments/3609596/CAL%20032%20Monash%20Big%20Scare%202.pdf](http://www.clearairinlondon.org/_attachments/3609596/CAL%20032%20Monash%20Big%20Scare%202.pdf)

Page 87 of the SEA stated:

*“Overall, it has been estimated that the Games will lead to a nearly 30% reduction in traffic flows on the ORN and PRN and about five per cent additional road traffic elsewhere, although it should be noted that this is at a time of year where traffic levels, particularly in London, are typically lower than average. “In addition, evidence from the Sydney 2000 Games indicates that there was also a reduction in background travel demand during the period of the Olympic Games and Paralympic Games. It has been noted in this respect that ‘a successful travel demand management programme (TDM) ... resulted in a notable decrease of background travel in Sydney during the Games. This was largely achieved through a patient and well-orientated pre-Games communications campaign, aimed at citizens, potentially affected residents, local commerce and large businesses’. Such demand management will also be a feature of the London 2012 Transport Plan. On this basis, therefore it is not anticipated that there would be an overall increase in traffic flows and vehicle kilometres during the period that the Transport Plan is operational.”* CAL emphasis.

CAL understands that a 30% reduction in non-Games Family traffic would be exceptional during the Olympic Games. In any event, because it depends on the use of the ‘Big Scare’ to manage people’s expectations such reductions are unlikely to be achieved in London given the ‘cat is out of the bag’. Some sort of large scale traffic bans or restrictions therefore seem inevitable for London. Beijing and Athens both imposed ‘odd and even’ number plate bans.

At the moment, it seems Mayor Johnson’s plan is to use dust suppressants on roads in front of official air quality monitors during the Olympic and Paralympic Games to reduce local air pollution and ensure compliance with the PM10 daily limit value in London. Even this approach, which would humiliate London in front of the world’s media, would do nothing to ensure compliance with NO2 limit values or avoid the worsening of unlawful levels of air pollution. It seems there is no convincing plan yet to ensure the Olympic Transport Plan and ORN in particular will not cause breaches of air quality laws.

### **Recommendations for action**

The Games should be a catalyst for long-term improvement in air quality so, for the duration of the Olympic and Paralympic Games and with a planned legacy, the Mayor should:

- Introduce a strict low emission zone or ‘Clean Air Zone’ that bans the most polluting heavy and light diesel vehicles from the most polluted parts of London. CAL has called for such action for years. The alternative is an ‘odd and even’ number plate ban which would affect all drivers equally e.g. including zero tailpipe emission vehicles; and
- Develop a contingency strategy detailing short-term measures to be taken if air quality standards (e.g. Bad Air Days) are likely to be exceeded during the Games period or 2012.

CAL considers alerts and/or public warnings should also be given where smog episodes occur.

### **Close**

CAL considers that London should be leading the world in tackling air pollution as it did after the Great Smog of 1952. Currently, this looks unlikely.