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Date: 24th February 2011

Dear Sian,

RE: London Borough of Newham Consultation Response to Planning Application Consultation

Your Ref: 2643/10

Location: The Fairground Site, Centre Road, Wanstead Flats, London, E7 OEF

Proposal: Application by the Metropolitan Police Authority for temporary use of land for a period of 90 days between June and September 2012 during the Olympic and Paralympics Games for the operation of a muster briefing and deployment centre.

This letter represents the formal consultation response of the London Borough of Newham regarding the above application for planning permission.

The application was discussed at the Council's Strategic Development Committee on 23rd February 2011.

Following the consideration of the application by the Committee I can confirm that the Council **objects** to the planning application for the following reasons.

Reasons for Objection

Safety of Local Residents

Although the Council acknowledges the importance of the proposal in relation to the functioning of the Olympic Games, the Council objects to the principle of the proposed temporary change of use of the land in question. The Council is very concerned that the centre is a potential terrorist target and poses a security risk for local residents. As you are aware, the closest residents to the application site reside in the London Borough of Newham. It has not been demonstrated to the Council or our residents how this security threat will be properly managed by the applicant to address the very legitimate personal safety concerns of local residents.

Safety and security is a material planning issue and the Council is not satisfied that this matter has been given due consideration in the planning application. The Council feels that alternative sites should be more fully explored.

The Council understands that these concerns have been raised by a number of our residents in their consultation responses to the London Borough of Redbridge. Please ensure the issues raised by Newham residents are given full consideration by your Regulatory Committee tonight as part of the assessment of the application.

Open Space

The Council does not support the principle of developing on the Wanstead Flats, even for the temporary period proposed.

The site is designated as Green Belt and Green Corridor land. The site is also designated as Heritage Land and a Site of Metropolitan Importance for Nature Conservation. To north of the site is a part of Wanstead Flats that is designated as a Site of Special Scientific Interest. Wanstead Flats as a whole provides access to open space, opportunities for outdoor sport and recreation, attractive landscape and nature conservation interest. We understand that the proposed development also requires a separate Legislative Reform Order to the Epping Forest Act 1878.

Overall the Council is concerned about the loss of amenity for local people by limiting their access to the Wanstead Flats and importantly the precedent that this proposal would set for other potential developments on Wanstead Flats in the future. The Council considers that the site is an inappropriate location for the proposed use.

We would consequently urge the London Borough of Redbridge to refuse the planning application for the above reason.

Other Concerns

In addition to our overriding concerns regarding security for local residents and land use, the Council also has a number of other concerns arising from shortcomings in the application documents, with particular regard to noise and transportation impacts, as set out below.

Noise

The conclusions of the submitted noise report do not accord with the proposed operation of the site. Night time noise levels and impacts on Newham residents cannot therefore be predicted accurately. In the absence of accurate information noise attenuation measures at the site cannot be assessed.

The suggestion in the noise report that noise from the 24 hour generators should be within 5dB of the background does not meet with the Council's standard requirement that plant operation and activity on site should not give rise to a BS4142 rating level greater than the background level at the nearest or worst affected property. Residents are entitled to be protected by reasonable standards. We acknowledge that this matter could be dealt with through a condition. Please refer to our suggested list of conditions below.

Transportation

Details of the locations proposed for drop-off/pick-up of officers are required to enable assessment from a traffic management and highway safety point of view. Details are also

required of the routes and approximate timings of horses based at the centre that will travel to the venues via roads in Newham. It accepted that these concerns can be addressed by a planning condition requiring this additional information. This information is needed to ensure Newham's Network Management team is fully informed of movements associated with the centre. Please refer to our suggested list of conditions below.

Conditions

If, against our advice, the London Borough of Redbridge resolves to grant planning permission, the Council is of the view that the following matters should be covered under conditions or Section 106 clauses attached to any planning permission. I do however wish to stress that the following conditions do not overcome our overriding concerns about security.

1. No operations, development or works relating to the Muster, Briefing and Deployment centre hereby approved shall commence on site before 23rd June 2012.

Reason: To accord with the terms of the application.

2. All development, structures and fencing associated with the Muster, Briefing and Deployment Centre hereby approved shall have been dismantled and removed from the site by 21st September 2012.

Reason: To accord with the terms of the application.

3. All operations associated with the Muster, Briefing and Deployment Centre hereby approved shall cease by 21st September 2012.

Reason: To accord with the terms of the application.

4. Prior to the commencement of the development hereby approved, a scheme for the restoration/landscaping of the site shall have been produced by the applicants in consultation with local residents and the London Borough of Newham Council; and the restoration/landscaping scheme shall be submitted to and approved in writing by the Local Planning Authority.

The commencement of the approved restoration/landscaping scheme shall begin before the 21st September 2012 and shall be completed by 21st November 2012.

Reason: To ensure that the site is restored to a satisfactory level.

5. Prior to the commencement of works on the development hereby permitted, an acoustic report shall be submitted to and approved by the Local Planning Authority. Plant operation and activity on site shall not give rise to a BS4142 rating level greater than the background level at the nearest or worst affected property. Where it is considered impractical to meet this noise standard the report should detail mitigation measures taken to reduce noise to a minimum.

The approved scheme shall be implemented prior to occupation of the development and shall be permanently maintained thereafter. The developer shall certify to the local planning authority that the noise mitigation measures agreed have been installed.

Reason: To protect the living conditions of nearby occupiers.

6. The hours where construction noise is audible at the nearest noise sensitive premises shall be limited to 08:00 – 18:00 Monday to Friday and 08:00 – 13:00 Saturday and at no time during Sundays and public holidays.

Reason: To protect the living conditions of nearby occupiers.

7. The number and time of vehicle movements shall not exceed those set out in the Transport Assessment. Vehicle movements shall be recorded and the data provided to the local planning on request.

Reason: To protect the living conditions of nearby occupiers.

8. Prior to the commencement of works on the development hereby permitted, further details of drop off/pick up locations, horse movements and scheduled traffic movements shall be submitted to and be approved by the Local Planning Authority. The approved development shall operate in accordance with the details thus approved.

Reason: To protect the living conditions of nearby occupiers, and ensure traffic impacts can be assessed and managed.

Additional Comments

In response to the concerns raised by local residents the Council also requires an undertaking from the applicant regarding on-going policing commitments to address the existing crime/anti-social behaviour problems in the locality, including the plantation behind Sidney Road/Centre Road. Local residents should be fully consulted as part of this process.

Please ensure that this letter is distributed to all of the members of Regulatory Committee. Please also ensure that the contents of this letter are fully considered as part of the assessment of the application.

Do not hesitate to contact me if you have any questions regarding the contents of this letter.

Please inform me of your Council's decision.

Yours sincerely,



Chris Gascoigne

Interim Head of Development Control: Major Applications

cc John Smith, CGMS
Kevin Mansell