

# GREATER LONDON AUTHORITY

[REDACTED]  
(By email)

Our Ref: MGLA080421-0280

19 July 2021

Dear [REDACTED]

Thank you for your request for information which the Greater London Authority (GLA) received on 8 April 2021. Your request has been dealt with under the Environmental Information Regulations (EIR) 2004.

You asked for:

*All correspondence to date between the GLA Planning team and Waltham Forest Borough Council concerning the application for Secret Group Ltd. to stage a temporary event on Low Hall Fields between June and September 2021. The planning reference is 203496.*

*This should include all documentation shared with the GLA by WF Council, all emails exchanged and all meeting agendas and minutes.*

*To avoid further requests please supply this information up until the date action is being taken to respond to this request.*

*In addition please also supply any correspondence conducted between the GLA and Secret Group Ltd in respect of the aforementioned application.*

Our response to your request is as follows:

Please find attached the information the GLA holds within scope of your request.

Further information held by the GLA is published here:

- [Planning Application: 2021/0062 \(force.com\)](#) [GLA Stage 1 letter and report]
- [Planning Application: 2021/0272 \(force.com\)](#) [GLA Stage 2 letter and report]
- [Waltham Forest | Waltham Forest Built Environment Online](#) [Planning application]
- [\(\\*\) Meetings, agendas and minutes \(walthamforest.gov.uk\)](#) [LBWT Licensing committee Documents]
- [\(\\*\) Meetings, agendas and minutes \(walthamforest.gov.uk\)](#) [LBWT Planning committee reports]

The GLA also holds a copy of the:

- Venue Operations
- Audience Route Detail
- Event Management Plan
- Coronavirus tools and the Application Form.

Redacted copies of these documents can be found on the LBWF website via the above links.

The unredacted versions of these documents fall under the exception to disclose in Regulations 12 (5)(a) (public safety) and 12 (5)(e) (confidentiality of commercial or industrial information) of the EIR.

Regulation 12 (5)(a) allows a public authority to withhold information when disclosure would result in hurt or injury to a member of the public. It can be used to protect the public, a specific group, or one individual who would be exposed to some danger because of the disclosure.

The information withheld from disclosure is not key to understanding the event itself, and may be replicated in part for administering future events. We have determined that safeguarding the safety of the public attending the events is of paramount importance

Further content falls under the exception to disclose in Regulation 12 (5)(e) (confidentiality of commercial or industrial information) of the EIR. Applying the four-stage test from *Bristol City Council v Information Commissioner and Portland and Brunswick Squares Association* (EA/2010/0012, 24 May 2010):

- The information is commercial or industrial in nature.
- Confidentiality is provided by law.
- The confidentiality is protecting a legitimate economic interest.
- The confidentiality would be adversely affected by disclosure.

Regulation 12(5)(a) and 12(5)(e) constitutes a qualified exemption from our duty to disclose information under the EIR, and consideration must be given as to whether the public interest favouring disclosure of the information covered by this exemption outweighs the public interest considerations favouring maintaining the exemption and withholding the information.

The GLA acknowledges that there is a public interest in the activities being undertaken with regards to the temporary events and a specific public interest in the transparency of the GLA's achievement in delivering Mayoral commitments.

Although the event at Low Hall Sports Ground is no longer going to be held this year and the planning and licensing applications in relation to the site/event have been surrendered, we consider that it is not in the public interest to prejudice the applicants future negotiating position for future event planning.

We therefore consider find that the public interest is therefore balanced in favour of non-disclosure of the redacted information because of the harm its release would cause to any future endeavours by the applicant for similar events elsewhere and the large volume of information that has already published in relation to the application.

Please note that some names of members of staff are exempt from disclosure under Regulation 13 (Personal information) of the EIR. Information that identifies specific employees constitutes

as personal data which is defined by Article 4(1) of the General Data Protection Regulation (GDPR) to mean any information relating to an identified or identifiable living individual. It is considered that disclosure of this information would contravene the first data protection principle under Article 5(1) of GDPR which states that Personal data must be processed lawfully, fairly and in a transparent manner in relation to the data subject.

If you have any further questions relating to this matter, please contact me, quoting the reference at the top of this letter.

Yours sincerely

**Information Governance Officer**

If you are unhappy with the way the GLA has handled your request, you may complain using the GLA's FOI complaints and internal review procedure, available at: [Freedom of information | London City Hall](#)

[REDACTED]

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**From:** dmconsultations  
**Sent:** 07 January 2021 16:58  
**To:** [REDACTED]  
**Subject:** FW: Natural England Concerns - 203496 - Low Hall Sports Ground

Hi [REDACTED]

Please see email below.

Regards

[REDACTED]  
[REDACTED]  
Corporate Business Hub  
London Borough of Waltham Forest  
Email: [REDACTED] [walthamforest.gov.uk](http://walthamforest.gov.uk)

Twitter: @wfcouncil  
Website: [www.walthamforest.gov.uk](http://www.walthamforest.gov.uk)

**Our ambition is that everybody in Waltham Forest enjoys a quality life.**



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**From:** [REDACTED]@naturalengland.org.uk>  
**Sent:** 07 January 2021 16:35  
**To:** dmconsultations <dmconsultations@walthamforest.gov.uk>  
**Subject:** Natural England Concerns - 203496 - Low Hall Sports Ground

Dear Sir/Madam,

Your Ref: 203496

Consultation: Temporary use of Low Hall Sports Ground for leisure / entertainment purposes (sui generis use) and installation of 142 temporary structures associated with that use, including ancillary parking and fencing.

The application described above has been brought to our attention due to its proximity to Lee Valley SPA and Walthamstow Marshes SSSI. We note that on the Waltham Forest Planning Portal Website it states that consultation is complete. However, as we were not consulted, we have not been able to put forward our comments.

Having reviewed the documents that are currently available online, we note that the impacts on the nearby designated sites do not appear to have been considered. Given that the event is due to occur during bird breeding

season, we highlight the importance of the potential for noise and light pollution from the event. While we do not have any major concerns surrounding the event, and wouldn't be likely to object to the proposal, we would recommend that the LPA ensures that some safeguards are put in place to ensure that the SPA and SSSI are not unduly affected. We would be happy to discuss these further and would welcome a conversation to alleviate any concerns.

We note this development may not have triggered the IRZs on Magic Map which may have resulted in Natural England not being consulted on the application. We recommend that these sorts of unique applications, in close proximity to designated sites, are sent to NE for consultation even if they have not triggered any of the IRZs.

Please don't hesitate to contact me with any further questions you may have.

Best wishes,

[Redacted signature]

[Redacted name]

Thames Solent Team | Natural England

[Redacted contact information]

[www.gov.uk/natural-england](http://www.gov.uk/natural-england)

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 20 January 2021 07:29  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Ecology Report - Secret Cinema Group Limited - Application 203496  
**Attachments:** ECO2724 - Low Hall Sports Ground.pdf

Morning [REDACTED]

A belated Happy NY 😊

I can confirm that I find the ecological report by GS Ecology in respect of the ecological assessment of the proposed theatrical film screening summer event at Low Hall Sports Ground, South Access Sports Ground E10 7JA in respect of the proposed Secret Cinema Group Limited - Application 203496, appears to be acceptable. The findings of the report concludes that there will be no discernible effect on habitats the summary excerpt of which I have copied from the report below.

## 5.0 Summary

- 5.1 The application site comprises part of an amenity grassland field. The field is not a "priority habitat" as defined in the NPPF and is very unlikely to host any protected or notable species.
- 5.2 The Walthamstow Marshes SSSI and the Lee Valley SPA are within 1km of the site and there is a local wildlife site (Low Hall Woods) and a watercourse (The Dagenham Brook) within 200m. These will be unaffected by the proposals.
- 5.3 The lighting scheme has been designed to ensure that the Dagenham Brook, Low Hall Woods and three trees that have features suitable for use by roosting bats will remain unlit.
- 5.4 In summary there should be no ecological constraints to proposals to use part of Low Hall Sport Ground as a temporary outdoor theatrical film screening area over the summer months.

Kind regards,

[REDACTED]  
[REDACTED]  
[REDACTED]  
**Economic Growth and Housing Delivery**

London Borough of Waltham Forest | Magistrates Court | Town Hall Complex | Forest Road | London E17 4JF

[REDACTED]  
<image002.png>Twitter: [@wfcouncil](#) Website: [www.walthamforest.gov.uk](http://www.walthamforest.gov.uk)

Our ambition is that everybody in Waltham Forest enjoys a quality life.

[#wfculture19](#) [wfculture19.co.uk](http://wfculture19.co.uk) [@wfculture19](#)

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**From:** [REDACTED] <[REDACTED]@walthamforest.gov.uk>  
**Sent:** 19 January 2021 11:55  
**To:** [REDACTED]@walthamforest.gov.uk; [REDACTED]@walthamforest.gov.uk

**Subject:** FW: Ecology Report - Secret Cinema Group Limited - Application 203496

**Importance:** High

Hi [REDACTED],

Can you please review the attached ecology report and advise if the information is acceptable?

I'll need your formal views by the end of next week.

Sorry to pressure you; we have a (planning )PPA for this site, and we need to get the application to the March committee.

Your previous comments are attached to this email; however, if you have any questions regarding the proposal, please email me.

Regards,

[REDACTED]

**From:** [REDACTED] <[\[REDACTED\]@eventsafetyplan.com](mailto:[REDACTED]@eventsafetyplan.com)>

**Sent:** 18 January 2021 14:59

**To:** [REDACTED] <[\[REDACTED\]@walthamforest.gov.uk](mailto:[REDACTED]@walthamforest.gov.uk)>

**Cc:** [REDACTED] | Secret Cinema <[\[REDACTED\]@secretcinema.org](mailto:[REDACTED]@secretcinema.org)>

**Subject:** Ecology Report

Hi [REDACTED]

I hope my email finds you well? Please see attached the ecology report as requested - hopefully this will go some way to alleviating the concerns of the residents who were worried about the impacts we would have on the park and wider area.

Please can you have a look and let me know what you think - is there anything else you need at this stage?

Kind regards

[REDACTED]

[REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 27 January 2021 09:48  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Secret Cinema

Hi [REDACTED]

Is there any way to get into the statement that any decision on the application will be made by the Planning Committee and we are intending to report it to committee in March?

And also the fact it's a temporary planning permission? I think that part may have been overlooked from some of the press stuff I've seen

Regards

[REDACTED]

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**From:** [REDACTED] <[REDACTED]@walthamforest.gov.uk>  
**Sent:** 27 January 2021 09:44  
**To:** [REDACTED] <[REDACTED]@walthamforest.gov.uk>  
**Cc:** [REDACTED] <[REDACTED]@walthamforest.gov.uk>  
**Subject:** RE: Secret Cinema

Hi [REDACTED]

Don't mention the movie, I have deleted this.

[REDACTED] is the lead from Planning on this so I have copied [REDACTED] in.

Regards

[REDACTED]

---

**From:** [REDACTED] <[REDACTED]@walthamforest.gov.uk>  
**Sent:** 27 January 2021 09:10  
**To:** [REDACTED] <[REDACTED]@walthamforest.gov.uk>  
**Subject:** RE: Secret Cinema

[REDACTED]

Rhona and others want me to strengthen the Secret Cinema statement,

I have proposed the below -BBC London TV have asked for an interview which we intend to turn down



Let me know your thoughts,

[REDACTED]

DRAFT - Residents of Waltham Forest are being consulted on an application by Secret Cinema. The consultation ends on the 14 February and all responses will be carefully considered before any decision is made.

As part of the application Secret Cinema have included 1500 free tickets to those living in the area close to the site which proposes to use around half of Low Hall Sports Ground ensuring that sports and other recreation activities will still be able to go ahead. Secret Cinema have also proposed plans to create jobs for the local community and ensure that there is no permanent damage to the grounds due to the performances.

No event will take place if either Government restrictions prevent it or local public health officials deem the event unsafe due to local levels of Covid19.

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**From:** [REDACTED] [REDACTED] <[REDACTED]@walthamforest.gov.uk>  
**Sent:** 25 January 2021 17:21  
**To:** [REDACTED] [REDACTED] <[REDACTED]@walthamforest.gov.uk>  
**Subject:** FW: Secret Cinema

As discussed.

Regards

[REDACTED]

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**From:** [REDACTED] [REDACTED] <[REDACTED]@walthamforest.gov.uk>  
**Sent:** 07 January 2021 15:26  
**To:** [REDACTED] [REDACTED] <[REDACTED]@walthamforest.gov.uk>; [REDACTED] <[REDACTED]@walthamforest.gov.uk>  
**Subject:** FW: Secret Cinema

FYI, there were 140 objections to Secret Cinema as below

[REDACTED]

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**From:** [REDACTED] [REDACTED] <[REDACTED]@walthamforest.gov.uk>  
**Sent:** 07 January 2021 15:10  
**To:** [REDACTED] [REDACTED] <[REDACTED]@walthamforest.gov.uk>  
**Subject:** RE: Secret Cinema

Thanks.

Most of the objections were on a template which was circulated. The text is below. The objections are combined licensing and planning objections, although most of the concerns are planning related rather than licensing.

I am writing to ask you to refuse Secret Cinema's licence application to hold shows on Low Hall Sports Ground for the following reasons.

## **1 The inadequate consultation process, which is contrary to the council's stated commitment to civic engagement in the Waltham Forest Proposed Submission Plan Review October 20**

Feedback received from neighbours on several streets facing St James' Park shows that notification about the application was not uniformly circulated. A small poster displayed at the back of the park prompted a call to Secret Cinema offices, following which information was distributed around these streets as late as 1st December, with an invitation to a consultation scheduled for 7th December.

A window of 7-10 days is not an acceptable timescale for community consultation.

The consultation has only sought views from a very small number of adjacent streets, whereas use of this green space and potential disruption and adverse impacts extends far more widely. To be meaningful, consultation should include residents at least as far as Blackhorse Road, St James Street and Walthamstow Central stations.

Although Waltham Forest officers have suggested that the council will normally accept objections until just before the application goes to the planning committee, the application has not been available to view either in person, because the Council offices are closed due to the pandemic, or online because the council is updating its software and the planning portal will not come back online until some point in mid-December, at a date as yet unconfirmed. I have been unable to find the licence application online either; the link circulated in the council's email simply takes you to a Word document stating an application has been made. It is undemocratic not to allow for proper scrutiny of the plans. This lack of transparency has undermined residents' confidence in Secret Cinema's process and commitment to local community.

## **2 A reduction in access to green spaces, essential for health and well-being, in an area already deficiently served at a time when many residents use the sports grounds and park, alongside activity groups.**

This is in contravention of the Mayor of London's 2013 report for Waltham Forest on environmental issues, which showed a direct correlation between improvement in local residents' mental and physical health and an increase in provision of, and access to, green spaces.

The report notes only 31% of the borough consists of green spaces, 8 out of 20 wards have deficient access to nature, and adult/child obesity is higher than the London average. Low Hall Sports Ground, while not a priority space for the council as indicated by the lack of maintenance, is one of the biggest and closest open green spaces for a large number of the borough's residents. It was invaluable during lockdowns and over the pandemic more generally, and is well used by many local residents for recreation and fitness.

## **3 A major disruption to community use / organisational programmes for young people and adults including vulnerable, at risk and hard to reach groups, working to develop skills, resilience and well-being.**

Low Hall Sports Ground and St James' Park are home to a growing number of football teams, including some led by local dads and established cricket teams who will have to relocate at the peak of their fixture season. There is regular youth training there, and fitness for marginalised groups. Most of the participants live locally and additional travel costs incurred in addition to membership subscriptions could easily reduce participation. Similarly targeted service offers for women only and older people have increased in recent years and participation is growing. Few of these organisations were consulted at all, by either the council or Secret Cinema.

All of this momentum would be jeopardised by the Secret Cinema events, taking place for the entire summer, and in direct contravention to the Council's own policy of increasing and developing green spaces for health and well-being stated in the Proposed Submission Plan Review of October 2020. Secret Cinema are proposing to occupy '46% of the park' (email response to resident, 30 October 2020), although it's unclear if this refers only to the built structures required for the performances or includes space needed for parking, egress etc. This is a massive infringement on established community access to green open space and their the activities that take place there.

In addition, the offer to retain a pathway around the edge of the event's fencing for residents to use is completely unsatisfactory. It would in no way replicate the physical and mental benefits of exercise in open green space.

#### **4 A lack of strategic planning for repairing the environmental damage to the ecology of the park with regard to pollution, wildlife and biodiversity.**

The current London Plan makes it clear that proposals 'should give the highest protection to sites with existing or proposed international designations (SSSIs, SPAs Ramsar sites)' and 'give strong protection to sites of metropolitan importance for nature conservation' (SMINCs). The Walthamstow Marshes Site of Special Scientific Interest (SSSI) and Walthamstow Wetlands, another Site of Special Scientific Interest (SSSI), a RAMSAR site and part of the Lee Valley Special Protection Area (SPA), are very close to the proposed event and birds particularly will be seriously impacted by the noise and light pollution coming from the event, which in addition will operate substantially within nesting season.

No plan is available in support of Secret Cinema's application to show how it will protect against environmental degradation in accordance with the borough's policy to promote sustainable habitats and biodiversity outlined in the October 2020 Proposed Submission Plan Review.

There is no plan or reassurance on how the company plans to maintain residents' access to Low Hall Nature Conservation Area and Wood and the Clearing for the three month period but prevent ticket holders from entering during or after events. Low Hall Nature Conservation Area and Wood is a semi-wild conservation area of scrubland and trees between the playing field and the allotments, which includes a section of Dagenham Brook. The risk to this area of increased footfall, litter and disruptive behaviour is significant, and this is an area cherished by the local community for its wildlife and birds. Under Section 1 (5) of the Wildlife and Countryside Act 1981, it is an offence to intentionally or recklessly disturb any wild bird included in Schedule 1 of the Act while it is building a nest or is in, on or near a nest containing eggs or young, and it is an offence to intentionally or recklessly disturb dependent young of such birds.

The events, spread over 3 months, will cause significant damage to the grass and the surface of the playing fields. Secret Cinema have not clearly stated what actions they will take reinstate the surface of the field, or when it would be available again for residents to visit, and local sports teams to resume fixtures.

Friends of St James' is an active group of local volunteers who have been working hard to clean neglected areas of Dagenham Brook and sustain biodiversity. Despite being asked to contact them before the first residents' meeting, Secret Cinema still has not done so. This important group of local residents has not been consulted about the impact of the application on the flora and fauna of the park or the potential increase in pollution caused by public gatherings, litter etc.

#### **5 An apparent disregard for the increased risk of crime and disorder, public nuisance and public safety**

The area around the park has long experienced significant issues with anti-social behaviour, drug dealing and street violence, which frequently results in serious incidents and fatalities. Secret Cinema is applying to serve alcohol until 22:30 most nights, with a projected 4,500 people attending each evening (with two events on some dates). If bars are open until 22:30, guests will be leaving the event for 60-90 minutes after the bars close. These huge numbers will serve as an open invitation to criminal opportunists and drug dealers.

Secret Cinema offered no reassurance on how ingress and egress would be managed if people did not make use of Lea Bridge Station as requested, despite being asked repeatedly about this during the first resident engagement event. With respect to public safety, there is no evidence that consideration has been given to the safety of people unfamiliar with the area leaving the venue and making their way back through the industrial estates. There is even less information on the management of public safety for people who decide to return home via Blackhorse Road Station or St James Street Station or by bus routes.

#### **6 An increase in noise and air pollution to local residents**

Even if a percentage of the audience does leave early, or travels via Lea Bridge Station, there is no plan to prevent the majority of the crowd travelling along South Access Road and through residential areas afterwards. Heavy traffic and footfall will increase both noise and air pollution, with no respite for residents' sleep patterns for almost three months, in total contravention of health and safety legislation guidance.

## **7 No tangible benefit for the most affected local residents or businesses**

Although there may be some free tickets available to local residents, this token gesture of 1500 tickets, representing 33.3% of 1 show over the 2.5 month run and two productions, does not make up for the months of disruption and the withdrawal of a vital local amenity for the entire summer, which benefits far more people.

Waltham Forest was ranked 35th most deprived borough nationally, according to the 2015 Index of Multiple Deprivation, and ticket prices for Secret Cinema events start at £49. It is unrealistic to say that this is an event that will give any tangible benefit to the area as it will be financially out of reach for many.

If ticket-holders do arrive via Lea Bridge Station as Secret Cinema would like them to do, they will walk to the site through an industrial area which has few consumer-facing businesses. The event will not deliver a boost to local businesses.

Secret Cinema has stated that it has a strong history of legacy projects but did not provide any details to reassure residents. There is mention of 'employment opportunities', but no further details or commitment, and presumably any employment will be for a maximum 3 month period which does not constitute a meaningful employment benefit to the community.

Given these points, I would urge officer to recommend the licence application is turned down.

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**From:** [REDACTED] <[REDACTED]@walthamforest.gov.uk>  
**Sent:** 07 January 2021 14:40  
**To:** [REDACTED] <[REDACTED]@walthamforest.gov.uk>  
**Subject:** RE: Secret Cinema

Thanks [REDACTED] we haven't signed an agreement yet but there is a 10% damage deposit in the Heads of Terms, attached is the latest draft and includes the reinstatement issue.

What was the main areas for objections?

[REDACTED]

---

**From:** [REDACTED] <[REDACTED]@walthamforest.gov.uk>  
**Sent:** 07 January 2021 14:14  
**To:** [REDACTED] <[REDACTED]@walthamforest.gov.uk>  
**Subject:** Secret Cinema

Hi [REDACTED]

FYI. We received approx. 140 objections to the Secret Cinema app. It has been referred to a licensing subcommittee for determination later this month.

Some of the representations site damage to the field as one of their concerns. Can you let me know what the agreement says/will say regarding the return of the site to good condition. A copy of the agreement might be useful.

Thanks

[REDACTED] | Regulatory Services | Resident Services  
London Borough of Waltham Forest  
3 The Square, Leyton, E10 5NR  
[REDACTED]  
Email: [REDACTED] [walthamforest.gov.uk](mailto:[REDACTED]@walthamforest.gov.uk)

**Our ambition is that everybody in Waltham Forest enjoys a quality life.**

ACHIEVEMENT  
AWARDS 2019  
WINNER   
Local Authority of the Year

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 03 February 2021 16:30  
**To:** [REDACTED]  
**Subject:** RE: Consultation-203496-Plans / unredacted documents required

Hi [REDACTED]

Thank you for sending that across, all looks great. No additional comments from our side. I did also suggest a site visit before they open so we can see this when it is fully operational. This will be done nearer to the time.

Kind regards,

[REDACTED]

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**From:** [REDACTED] <[REDACTED]@walthamforest.gov.uk>  
**Sent:** 03 February 2021 15:25  
**To:** [REDACTED] <[REDACTED]@walthamforest.gov.uk>  
**Subject:** RE: Consultation-203496-Plans / unredacted documents required

Thanks [REDACTED]

Please find attached plan re: 015-floodlights.

Can you advise if you are satisfied with the proposal ?

many thanks

[REDACTED]

---

**From:** [REDACTED] <[REDACTED]@walthamforest.gov.uk>  
**Sent:** 03 February 2021 14:32  
**To:** [REDACTED] <[REDACTED]@walthamforest.gov.uk>  
**Subject:** RE: Consultation-203496-Plans / unredacted documents required


Hi [REDACTED]

There are no comments with regards to environmental noise and the secret cinema group, as the noise management plan covers any potential issues already. When I had a meeting previously with the acoustic consultant and one of the project officers, I explained a potential issue concerning light pollution. Due to the fact that they will have security on site 24 hours a day, they explained the need for floodlights on site in use. This is fine, but we will need an aerial map of the site, highlighting where these floodlights will be positioned. This is to ensure that these lights will not negatively impact the surrounding residents. I did mention this to them previously so they should be aware of this requirement from themselves.

Kind regards,

[REDACTED] – [REDACTED]  
Environmental Protection Team  
London Borough of Waltham Forest

[REDACTED]  
Website: [www.walthamforest.gov.uk](http://www.walthamforest.gov.uk)

 Follow us [@wfcouncil](https://twitter.com/wfcouncil)



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**From:** [REDACTED] [REDACTED] <[REDACTED]@walthamforest.gov.uk>  
**Sent:** 03 February 2021 09:59  
**To:** [REDACTED] [REDACTED] <[REDACTED]@walthamforest.gov.uk>  
**Subject:** FW: Consultation-203496-Plans / unredacted documents required

This infor might be helpful

[REDACTED]

---

**From:** [REDACTED] <[REDACTED]@leevalleypark.org.uk>  
**Sent:** 05 February 2021 21:44  
**To:** [REDACTED]  
**Subject:** RE: Ecology Report

Hi [REDACTED]

Thanks for sending the Ecology Report across. My colleague has now considered the Ecology Report and whilst the report provides a useful review of the site, based on data searches available from the local area, it does not fill any gaps in the data. For example there is an assumption that bats only use the boundary of the site, but there is no bat use survey that backs this up and it is possible they are commuting across the site for example. The report concludes that there will be no impact on the biodiversity of the area but we would like to see safeguards and mitigation measures in place. It might be worth considering some independent on site noise monitoring during events particularly from positions close to the key habitat areas both on the application site and on the adjacent protected areas.

Kind regards  
[REDACTED]

---

**From:** [REDACTED] [mailto:[REDACTED]@walthamforest.gov.uk]  
**Sent:** 03 February 2021 09:11  
**To:** [REDACTED] <[REDACTED]@leevalleypark.org.uk>  
**Subject:** Ecology Report

Hi [REDACTED]

I hope you are well.

I am just writing to check if you had a chance to review the attached ecology report and if there are any comments you would like to make?

Regards,

[REDACTED]  
[REDACTED] **South Team**

London Borough of Waltham Forest | Development Management | Magistrates Building | 1 Farnan Avenue | London E17 4NX  
Email address: [REDACTED] [\[REDACTED\]@walthamforest.gov.uk](mailto:[REDACTED]@walthamforest.gov.uk) [REDACTED]

**Any views or opinions expressed in this email are made at officer level and without prejudice, and whilst given in good faith, do not represent a formal decision of the Local Planning Authority.**



[REDACTED]

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**From:** [REDACTED]  
**Sent:** 24 March 2021 11:38  
**To:** [REDACTED]  
**Subject:** FW: GLA/0062/TT/02  
**Attachments:** Community Deliverables\_Low Hall Planning Conditions (002).pdf; Secret Cinema- TFL comments.pdf; FW: Consultation-203496-Plans / unredacted documents required

Thank you [REDACTED] for sending through this with apologies for the delay in my reply. I think it is a good start to address and resolve the outstanding issues. However, as I have clearly stated in my earlier email, the applicant/agent must be fully engaged with the TfL ([REDACTED] ccd in this) to address transport concerns, which until now I assume have not done so. And [REDACTED] will comment on this and the attached Agent's response (attached) to TfL comments.

Regarding the community use agreement issue, I welcome what have been proposed but these commitments (both in black and red) must be written as part of a Community Use Agreement (CUA) and form part of the planning documentation and their implementation secured through conditions and S106 Planning Agreement.

Finally, I would like to see your committee/delegated report and the draft decision notice with conditions and the draft s106, and clearly written CUA - prior to any Stage 2 referral.

Kind regards,  
[REDACTED]

---

**From:** [REDACTED] <[REDACTED]@walthamforest.gov.uk>  
**Sent:** 15 March 2021 17:59  
**To:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Cc:** [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@walthamforest.gov.uk>; [REDACTED] <[REDACTED]@walthamforest.gov.uk>  
**Subject:** RE: GLA/0062/TT/02

Hi [REDACTED]

Thank you for your email.

Please note that documentation addressing the issues raised was submitted with the original application. Apologies if you have not yet accessed these; these documents are attached here for your reference:

- 023- Draft Event Management Plan
- 026- Coronavirus tools
- 009 Venue operations
- 013a Audience route
- Community deliverables (new)
- Applicant's response to GLA comment (new)

The following conditions are included in the draft decision notice:

- Event Management Plan to include the following
- Construction Management Plan
- Detailed Constructions Logistics Plan
- Cycle/Parking
- A planning condition is also recommended to return the land back to its former condition. The applicant has entered into a Legal Agreement with the Councils' Parks team. As part of the agreement with Secret Cinema a damage deposit will be in place to cover any required reinstatement works.

The applicant has recently advised that shows would take place for three weeks of the fourteen-week timeframe. Taking into account the information in this email and the temporary nature of the event, I would be grateful if you can advise if we have resolved the issues raised at Stage 1.

Ideally, the applicant and I intend to resolve any outstanding concerns that you might have prior to the committee meeting on the 30<sup>th</sup> March. Therefore I would be very grateful if you can send any final comments you might have before the 25<sup>th</sup> March for the update report.

Thanks a lot for your help with this application and don't hesitate to contact me if you want to make any additional comments.

Kind Regards,

[REDACTED]

---

**From:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Sent:** 12 March 2021 08:36  
**To:** [REDACTED] <[REDACTED]@walthamforest.gov.uk>  
**Cc:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Subject:** RE: GLA/0062/TT/02

Thanks [REDACTED] for your email.

The time scale to process Stage 2 referral with a positive outcome depends on the actions taken in resolving outstanding issues.

In this particular case, I have advised earlier (as detailed in my Stage 1 report) that there are 2 areas of strategic planning concerns that must be resolved and that agreed measures secured.

I have not got any information what actions are being taken to resolve the 2 outstanding issues: Community Use & Transport (in particular on this issue the applicant must be engaged with TfL).

That said, once the Council sends us its complete Stage 2 referral Pack and we acknowledge that the referral is in the right order and complete, the Mayor has got 14 days to make his final decision.

But without the above – without resolving outstanding issues raised at Stage 1, it is very unlikely a positive recommendation can be made.

Kind regards,

[REDACTED]

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**From:** [REDACTED] <[REDACTED]@walthamforest.gov.uk>  
**Sent:** 11 March 2021 17:07  
**To:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Cc:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Subject:** GLA/0062/TT/02

Hi [REDACTED]

**Our ref: GLA/0062/TT/02**  
**Your ref: 203496**

I hope you are safe and well.

Can you advise how long it takes to deal with a Stage 2 referral?

The applicant for the Secret Cinema wants to know how this will impact their internal timescales.

The committee is scheduled for the 30TH March. In the event of approval, we intend to refer the application to the Mayor before 2<sup>nd</sup> April.

Regards,

[Redacted Signature]

- South Team

London Borough of Waltham Forest | Development Management | Magistrates Building | 1 Farnan Avenue | London E17 4NX

Email address: [Redacted] [\[Redacted\]@walthamforest.gov.uk](mailto:[Redacted]@walthamforest.gov.uk) Tel: [Redacted]

**Any views or opinions expressed in this email are made at officer level and without prejudice, and whilst given in good faith, do not represent a formal decision of the Local Planning Authority.**

## **SECRET CINEMA – LOW HALL - COMMUNITY DELIVERABLES**

**Please note these are subject to change pending Government Guidelines surrounding COVID-19**

**Sections in black are guaranteed deliverables.**

**Sections in red on page 2 are what we aim to deliver over and above these.**

### **LOCAL RESIDENT ENGAGEMENT**

- Monthly Virtual Resident Meetings

### **LOCAL TICKET OFFERS**

- 1500 x free resident tickets for main shows
- Further discounted show tickets for selected Waltham Forest Postcodes

### **FREE COMMUNITY SCREENING**

- Free Community Screening of family friendly title for local residents
- Residents will be able to vote for title from selected list provided by Secret Cinema

### **LOCAL SUPPLIER & FOOD TRADER ENGAGEMENT**

- Opportunity for local companies and traders to tender for contracts.

### **LOCAL EMPLOYMENT**

- Opportunities for a minimum of 12 x local persons to be employed on production.

### **PRODUCTION WORKSHOPS**

- 5 x career focused Production Workshops for local school groups.
- Covering subjects including: Creative, Design, Operations, Production, Stage Management.

### **PARTNER WORKSHOPS**

- 2 x bespoke National Partner Workshops for local school groups.
- Previous partners have included: Arup, LEGO, RI, Royal Observatory, V&A.

### **CAREERS SESSIONS**

- 2 x off site careers sessions delivered to local schools / college.

### **DAYTIME IMMERSIVE EVENT**

- 1 x Special Immersive Event for local schools, colleges & community groups.

### **WORK SHADOWING (18-25 years)**

- 18 x students to undertake a two-day taster experience of working on live shows.
- Engaging with: Front of House, Operations, Production, Stage Management and Technical.

## **WHAT WE AIM TO DELIVER OVER AND ABOVE CONDITIONS ABOVE**

- LOCAL EMPLOYMENT - 25-30 local persons employed on production.
- PARTNER WORKSHOPS: Collaboration with additional Local Activity partners to provide further learning and participation opportunities.
- LOCAL CHARITY PARTNER – Legacy fundraising initiative for local charity.

██████████ ██████████  
**London Borough of Waltham Forest**  
Environment and Regeneration  
Waltham Forest Council  
London  
E17 4JF

8 March 2021

**Our Ref: D-SC-S1-21-200**

Dear ██████████

**Re: Secret Group Events, Low Hall Sports Ground**

Further to your email, please find below a response to the comments raised by TfL and The Mayor of London:

**Transport for London**

Transport for London	Applicant Response
<b>The applicant should clarify expected demand and depending on the outcome,</b> Waltham Forest Council are urged to seek a contribution as necessary towards this.	Please refer to document 009 and is in line with previous successful Secret Group Limited projects.
<b>Crossing points and other traffic management on Argall Way and Argall Avenue Road are of particular concern due to impact upon the reliability of bus service operations and roadworks in the area.</b> TfL would expect to be consulted on the details of these arrangements which should be secured through in the event management plan.	Consultation with TfL is welcome, either through the Event Safety Advisory Group (SAG) process or independently. Please feel free to pass on my contact details.  The securing of an Event Management Plan by condition is expected and acceptable to the applicant.
<b>TfL welcomes the use of stewards in attendee routing which should be secured through the event management plan.</b>	We are pleased that TfL recognise our work in this area. The securing of an Event Management Plan by condition is expected and acceptable to the applicant.
<b>The applicant should set out the key walking routes and identify any necessary event wayfinding.</b>	Please refer to document 009. There will be no signage or other wayfinding as staff (human signposts) will be used to manage

	and direct audience members safely from the station to the event site - a methodology successfully used on numerous other events around London over the past twelve years.
<b>The applicant should assess the risks to safety of the cycle and pedestrian routes to and from the site and identify measures to help ensure they operate safely in line with a commitment to Vision Zero.</b>	This work has been partially completed in document 013b, however further safety management works are to take place. A commitment to Vision Zero is acceptable where applicable.
<b>The event management plan should consider how crowding at key points would be mitigated and managed.</b>	Agreed and accepted
<b>An appropriate quantum of event cycle parking will need to be agreed, details of the location and design should be secured by condition. At least 5% of any cycle parking should be suitable for larger and adapted cycles Clarification is required on the cycling access/egress routes through and to the site is required..</b>	<p>The outdoor and temporary nature of our venue mean that standard calculations are not wholly appropriate for our application. By their nature, our events do not attract many audience members by cycle. We have monitored cyclist numbers over a number of shows and believe that the cycle parking will be sufficient.</p> <p>Our model allows for the majority of our audience to attend by train / tube and with no car parking (apart from access patrons) provided for the event, virtually all of our attendees arrive and depart by public transport.</p> <p>Many of our attendees are in fancy dress (in line with the film title) meaning that cycling is often difficult.</p> <p>We are however committed to monitoring the usage of the cycle parking and will increase the provision should we find that facilities are insufficient.</p>
<b>The proposal would include 10 disabled spaces only which have to be pre-booked. This is strongly supported. The event management plan should include measures to deliver temporary parking restrictions on the surrounding road network and measures to prevent overspill.</b>	<p>We are pleased that TfL recognise our work in this area.</p> <p>Parking restrictions are not required as our audiences do not know where the venue is located and only have the transport hub (train station) as an arrival point. Our audiences understand that parking is not permitted or encouraged, and often consume alcohol. As</p>

	responsible event goes this means that driving is not appropriate. Despite running events for long periods in many London Boroughs (including similar audience numbers in Gunnersbury Park in 2018) we have <u>never</u> had an issue with parking around our event sites. We will however monitor this in the surrounding streets.
<b>TfL expects that the proposals will require short term road closures, private hire/ taxi pick-up/ drop off and crowd management, which could impact on the efficient operation of local bus services, particularly route W19 which is located along the primary access of the site on South Access Road.</b>	<p>We do not anticipate nor are we planning for any short term road closures, private hire/ taxi pick-up/ drop offs on the public highway.</p> <p>Crowds will be managed by our highly experienced team and moved to and from the venue in a carefully controlled manner with little or no impact on the W19 bus service.</p>
<b>The safe operation of the route must be maintained without obstruction by parking cars or people travelling to and from the venue. Ad hoc event day parking must therefore be restricted along South Access Road. This should be addressed through the event management plan in consultation with the Council and TfL.</b>	<p>We agree that the safe operation of the route must be maintained, however parking restrictions will not be required (as outlined above).</p> <p>The draft Event Management Plan discusses how audience movement will be managed</p>
<b>The proposed arrangements for taxi pick-up and drop-off should also be set out.</b>	A taxi drop off/ collection will not be provided (see below), however we welcome a discussion with TfL on this matter.
<b>A space for all pre-booked private hire vehicles (PHVS) together is more easily managed from a public safety perspective.</b>	This is agreed - and will be located on private land within the Argall Trading Estate.
<b>Clear plans of signage for the taxi rank and (PHVS) area and the location of this signage need to be submitted and approved by TfL (TPH).</b>	There will be no taxi rank, and all other elements will be managed on private land, not on the public highway.
<b>TfL would recommend a taxi management protocol is secured by condition to set out principles to help ensure there is a safe provision for all taxi users with details prepared for each event. It is important that the taxi provision is designed to be accessible by all taxi users including wheelchair users.</b>	A taxi rank is not planned.



Sufficient space will need to be provided for ramp access to vehicles. The applicant should demonstrate that the taxi mode share forecasted can be safely accommodated given the designated area capacity as there is concern that taxis may queue back onto the wider highway network.	
Although the construction period is limited, a Construction Management Plan (CMP) should be secured by condition. We expect a commitment to Direct Vision and Fleet Operators Recognition Scheme accreditation for all vehicles of at least Silver and Gold rating. The construction proposals in the full CLP should support the Mayor's Vision Zero Action Plan	Should this refer to a Construction Logistics Plan? If so, securing one by condition is welcomed and accepted.
Deliveries and Servicing should also be managed in combination with event management.	Agreed

cont...

Mayor of London	Applicant Response
<b>Principle of development:</b> Installation of temporary structures for outdoor recreation use for a temporary period on a playing field is acceptable. However, the Council must ensure that the land is returned to its existing or better condition after the temporary use cases through appropriate conditions or S106 agreement.	This is acceptable through a condition
<b>Community use:</b> Details of cultural jobs and skills training for the local community in the form of a draft community use agreement should be submitted prior to any Stage 2 referral to the Mayor.	If the current information supplied is insufficient then we can happily provide further clarity - please let me know what you require.
<b>Transport:</b> There are strategic transport concerns regarding adverse impacts on Lea Bridge station, pedestrian/cycle access routes, bus routes, coaches and taxis and coordination of events with other venues. These concerns must be addressed and resolved through appropriate conditions or S106 agreement.	We are happy to address this through suitable conditions, although it should be noted that we have been in regular contact with Greater Anglia and station management.

Yours,



on behalf of Secret Group Limited

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 01 April 2021 15:28  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: App Ref: 203496 - Low Hall Sports Ground

Hi [REDACTED]

Thank you for your email.

All your concerns are noted and understood and I would like to ask if you will be willing to accept additional information in the form of a pre-commencement condition which hopefully should give Sports England certainly that there land would be reinstated to its formal condition or better . The condition would read as follows:

1. In accordance with the terms of the hirers agreement, the playing field and sports pitches shall be assessed and reinstated, after the closure of the event and removal of the temporary structures, to the standard required within the approved scheme of remediation as set out within the hirers agreement; thereby returning the land to be available for playing field use at the existing or better standard.

Reason: To enable the Local Planning Authority to review the suitability of the development in the light of circumstances prevailing at the end of the above period and in the interests of the amenities of the area, in accordance with Policy CS15 of the adopted Waltham Forest Local Plan – Core Strategy (2012) and Policies DM29 and DM32 of the adopted Waltham Forest Local Plan – Development Management Policies (2013).

We have not formally determined this application and I would be grateful if you can confirm at your earliest convenience if an appropriately worded condition can alleviate your concerns and lift your holding objection to the proposal.

Thanks a lot for your hard work on this proposal given our tight timescales.

Regards,

---

**From:** [REDACTED] <[REDACTED]@sportengland.org>  
**Sent:** 31 March 2021 16:48  
**To:** [REDACTED] <[REDACTED]@walthamforest.gov.uk>  
**Cc:** [REDACTED] <[REDACTED]@walthamforest.gov.uk>; [REDACTED] <[REDACTED]@walthamforest.gov.uk>; [REDACTED] <[REDACTED]@walthamforest.gov.uk>  
**Subject:** RE: App Ref: 203496 - Low Hall Sports Ground

Hi [REDACTED]

Thanks for your email and clarifying some of the concerns raised.

Unfortunately without seeing the detail I cannot add any comments in relation to the conditions etc.

Also, given the stance of your email I am assuming that the application was been approved? If so, just a gentle reminder that since the application had an outstanding Sport England objection that the Council should refer the application to National Casework Unit.

Kind Regards

We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gaile Walters](#)

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**From:** [redacted] <[redacted]@walthamforest.gov.uk>  
**Sent:** 31 March 2021 10:16  
**To:** [redacted] <[redacted]@sportengland.org>  
**Cc:** [redacted] <[redacted]@walthamforest.gov.uk>; [redacted] <[redacted]@walthamforest.gov.uk>; [redacted] <[redacted]@walthamforest.gov.uk>; [redacted] <[redacted]@walthamforest.gov.uk>  
**Subject:** RE: App Ref: 203496 - Low Hall Sports Ground

Hi [redacted] thanks for coming back to me on this, please see below in red my further response to your concerns.

I hope this addresses your concerns and as a result you would be willing to lift your objection.

Thanks

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**From:** [redacted] <[redacted]@sportengland.org>  
**Sent:** 30 March 2021 16:48  
**To:** [redacted] <[redacted]@walthamforest.gov.uk>  
**Cc:** [redacted] <[redacted]@walthamforest.gov.uk>; [redacted] <[redacted]@walthamforest.gov.uk>; [redacted] <[redacted]@walthamforest.gov.uk>; [redacted] <[redacted]@walthamforest.gov.uk>  
**Subject:** RE: App Ref: 203496 - Low Hall Sports Ground

Hi [redacted]

Thanks for your email and addressing the points raised.

In relation to cricket, given that the artificial wicket is in a poor condition, arguably unplayable and would be replaced post event, the overall impact on cricket appears to have been managed.

In relation to the rest of the playing field/football pitches, aerial photographs of the site do show more pitches marked than you have indicated but I'll will accept your position given it would be the Council that would have been marking out the site. Looking at aerial photographs both Leyton Jubilee Park and St. James Park do not appear to have pitches so it appears those sites could be an option to relocate some pitches temporarily however would you be able to confirm the changing room situation at those sites given it appears to be adult teams being displaced? Also, are these sites capable of being marked for football, i.e. they are not overgrown, have drainage etc.? Both look more akin to park/open space than playing fields from aerial photographs. If both are capable of accommodating pitches to the quality required then this, and the capacity mentioned on AGP's, could accommodate displaced capacity depending, of course, on the extent of capacity is used on the AGP's during the peak time.

Neither Leyton Jubilee Park or St James Park currently have pitches marked out, there are changing rooms, toilets and a club room at Leyton Jubilee Park that can accommodate this, there aren't any facilities in St James Park but it is adjacent to Low Hall Sports Ground so the existing changing provision can be utilised. Both sites are managed and maintained and would not have any issues being marked out, they are not overgrown or have drainage issues. There is ample room at Leyton Jubilee Park for at least 4 pitches.

I also have concern with the wording of the Heads of Terms as the wording is not clear in my view. It appears that the refundable deposit would only be provided if wear and tear/damage is above what is expected from a 4,999 capacity. If this is correct, then this would not be acceptable to Sport England since the event, regardless of the numbers on the site, is likely to cause wear/tear and damage considerably above what would otherwise happen on the site, i.e. from one or two football games and training (or even less if it is not used out of the football season). How is damage from 4,999 or more assessed compared to that below this figure? I am may have misunderstood this term but the mere fact that I have suggests that there is some ambiguity that should be addressed. **We will address this as part of the Heads of Terms, our Planning committee last night added the requirement of a site assessment by a competent sports agronomist, we will ensure that the wording in the Heads of Terms reflects the reinstatement to the standard agreed at the start by the sports agronomist and reinstatement to existing or better state by way of planning condition.**

In addition, the hirer should provide a site assessment from a competent sports agronomist that sets out the existing quality of the playing field before any temporary facilities are brought onto the site and then after the event provide another assessment undertaken from a competent sports agronomist that assesses the playing field quality and sets out specification of work required to bring the playing field back to, at least, the quality it was prior to the event/temporary facilities entering the site. This would also then inform the length of time teams would have to play away from the site. **This was agreed at Planning Committee last night and will be added as a Head of term to the hirers agreement. In addition a planning condition was added to the permission to require the land within the site to be reinstated to the existing or better condition after the event.**

In light of the above, there are too many unknowns for me at this stage to lift Sport England's objection as concerns remain in relation to the pitch quality and displacing users.

Kind Regards

[REDACTED]  
[REDACTED]  
We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gaile Walters](#)

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**From:** [REDACTED] <[REDACTED]@walthamforest.gov.uk>

**Sent:** 29 March 2021 10:57

**To:** [REDACTED] <[REDACTED]@sportengland.org>

**Cc:** [REDACTED] <[REDACTED]@walthamforest.gov.uk>; [REDACTED] <[REDACTED]@walthamforest.gov.uk>; [REDACTED] <[REDACTED]@walthamforest.gov.uk>; [REDACTED] <[REDACTED]@walthamforest.gov.uk>

**Subject:** RE: App Ref: 203496 - Low Hall Sports Ground

Dear [REDACTED] thank you for taking the time to talk to me on Friday regarding this planning application. I am sorry that you have not had sufficient information to assist your response.

As discussed, I hope the following provides the level of detail required:

1. Football

Our football season runs from mid September until the end of March. For the last few seasons there has been a maximum of two individual adult teams playing fixtures at any given time at Low Hall Sports Ground, these have been accommodated on the arena pitches and if necessary on the odd occasion on the plateau. We have only had a maximum of four pitches marked out weekly on the site and no home or development club attributed to the site. There are no junior teams playing on the grass pitches.

With the current lifting of restrictions due to the pandemic and the extension to the season for football, we would still be able to provide enough capacity across our sites to meet any

teams requirements. We are also offering out 3G pitches for use to accommodate additional fixtures.

The new football season doesn't start until mid September and we will provide pitches as per the bookings. We hope that we will be able to provide pitches on the plateau at Low Hall but should this not be possible due to any required reinstatement works we will offer replacement pitches at either Leyton Jubilee Park or St James Park but we believe that we will be able to accommodate the required fixtures on site and we will also have the Arena pitches available for booking.

As previously stated the artificial pitches at Low Hall will also remain open.

## 2. Cricket

Our cricket season runs from mid April until the end of August and Low Hall provides two wickets. Historic data shows that the arena pitch is used weekly and the plateau pitch has had the occasional fixture for the last few years. There hasn't been any regular use of the plateau pitch. The artificial wicket is not currently usable as it needs replacing and is on our schedule of works required.

Conversations took place with Essex CC regarding provision and no objections were received as we could accommodate the regular cricket without restrictions.

Any cricket fixtures for the plateau can be accommodate pre and during the build time for Secret Cinema.

## 3. Reinstatement works

We do appreciate that the hosting of Secret Cinema may cause some damage to the ground works, we have secured a damage deposit to reinstate the ground as necessary. The Heads of Terms states:

*The Council is responsible for ensuring that during the Hire Period, the Site will be readily and freely available to stage the Events, in a safe condition for the holding of the Events, and fully compliant with all applicable law before the start of the Hirer's occupancy.*

*The Hirer will pay a £XXX refundable deposit against 'Damage' and to cover liability resulting from breach of the Hire Agreement by the Hirer or its Supplier(s). "Damage" would be deemed to be that above the level of wear and tear which would be expected based on a number of events of 4,999 (daily) capacity. – i.e. wear and tear not requiring remediation would include but is not limited to:*

- *Shorter grass where footfall has worn grass levels to earth level.*
- *Discolouration of grass beneath structures.*
- *Minor surface scuffs or scrapes to soil and grass area or imprint of trackway*

*Damage could include but is not limited to:*

- *Large holes, tears or tyre channels cut into the grass*
- *Large holes, dents or markings to park / street furniture*

*The Hirer and the Council will undertake and sign off a Site assessment (including neighbouring property) to include photographic evidence to record the condition of the Site and neighbouring property immediately before and after its occupancy of the Site.*

As you are aware I am committed to ensuring grass roots sport is provided and believe that this event will not significantly impact the delivery of this nor will there be displacement of clubs/users as a result.

Please give me a call if you need anything further.

I hope that this now provides the level of detail required for you to support the planning application and would be grateful if you could respond back by close of play today on this matter.

Thanks

[REDACTED]

[REDACTED] | Neighbourhoods | Resident Services London Borough of Waltham Forest Leyton Sports Ground  
E10 6PY

Email: [REDACTED] [walthamforest.gov.uk](mailto:[REDACTED]@walthamforest.gov.uk)

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**From:** [REDACTED] <[REDACTED]@walthamforest.gov.uk>  
**Sent:** 25 March 2021 15:08  
**To:** [REDACTED] <[REDACTED]@walthamforest.gov.uk>; [REDACTED] <[REDACTED]@walthamforest.gov.uk>; [REDACTED] <[REDACTED]@walthamforest.gov.uk>  
**Cc:** [REDACTED] <[REDACTED]@walthamforest.gov.uk>; [REDACTED] <[REDACTED]@walthamforest.gov.uk>  
**Subject:** FW: App Ref: 203496 - Low Hall Sports Ground

Hi,

We have received an objection from Sports England. (please see email below)

Can you provide a reply to the issues raised?

We need to go back to sports England and resolve this today.

Many thanks for your help.

Regards,

[REDACTED]

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**From:** [REDACTED] <[REDACTED]@sportengland.org>  
**Sent:** 25 March 2021 13:02  
**To:** [REDACTED] <[REDACTED]@walthamforest.gov.uk>  
**Subject:** RE: App Ref: 203496 - Low Hall Sports Ground

Hi [REDACTED]

Thanks for forwarding the details.

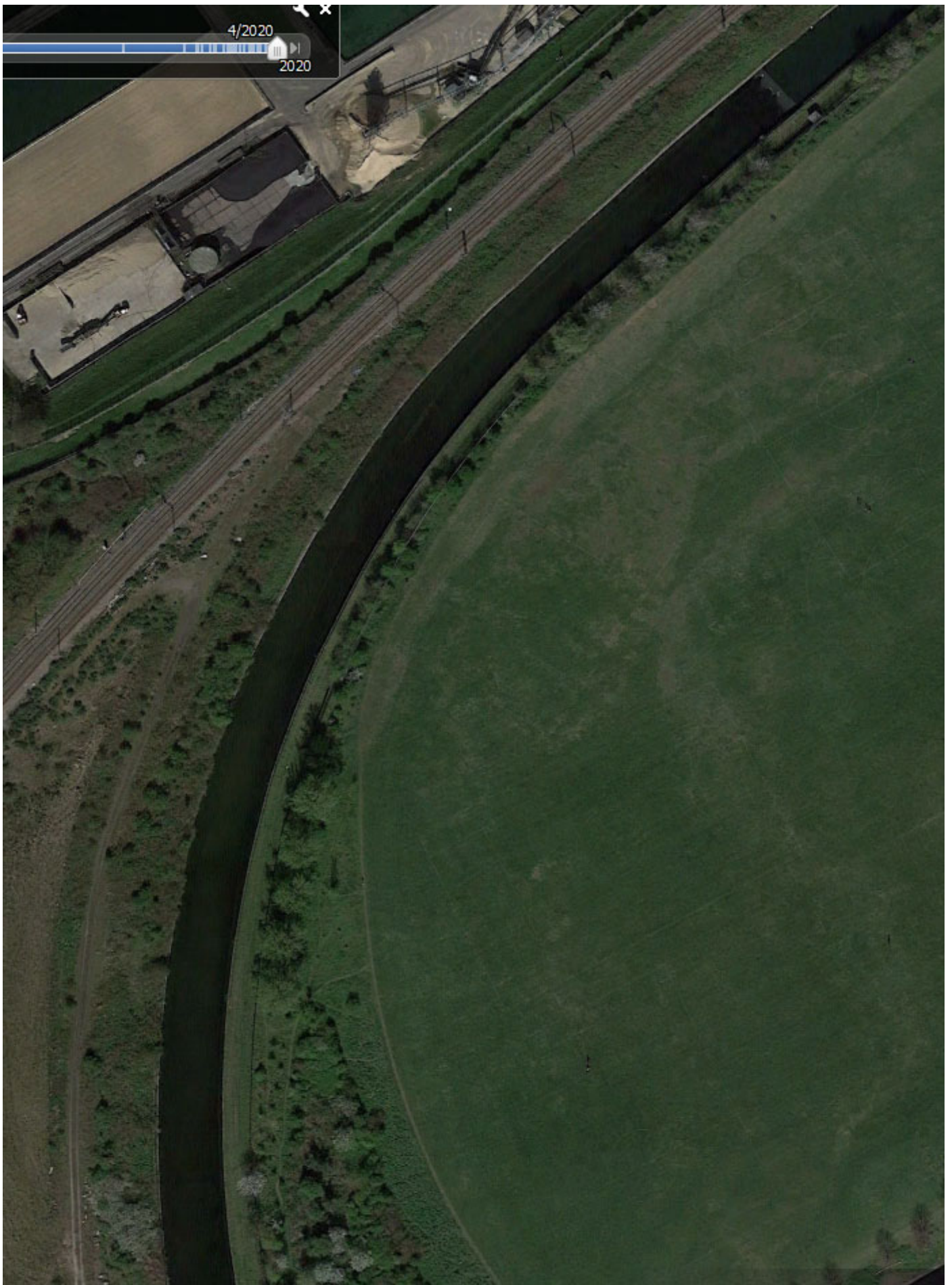
On the whole, what was previously requested as not been fully provided to Sport England's satisfaction therefore Sport England's objection previously stated still stands. Below are my observations on the detail provided.

It appears that the area of playing field, and pitches, lost would not be replaced for the temporary period as the email indicates that play would be directed to other sites. As a result, there would be a net loss during the period the proposed use and facilities are in place/operational and likely beyond due to likely impact on the ground through the higher number/concentration of people on the site compared to the site being available as open space for the local community. It is not clear where the detail relating to capacity of other sites has been taken but if it is the Playing Pitch Strategy the data was taken a few years ago so I would need to check if these elements are still accurate. I can liaise with the Sport Governing Bodies in this respect. This aside, a few things should be taken into consideration:

- There would need to be spare capacity at peak times at those sites where Low Hall's play would be relocated to, i.e. although a pitch can take more play if it is not when leagues/users play then it would not be able to mitigate the loss proposed at Low Hall. I appreciate that the Parks & Recreation Team have indicated there is spare capacity in relation to unseen demand but it is not clear if this has taken into account the proposed displaced demand.

- The teams/users that would be displaced would need to be known. This has not been articulated therefore it is difficult to understand capacity implications at other sites. In addition no plan has been provided demonstrate who would go to which site (this would also ensure users have the ability to access these other sites).
- As a result of the restrictions imposed by coronavirus there would have unlikely been a need, or a least a need reflective of 'normal' play, last season therefore there are limitations referring back to what pitches were marked last season.
- The layout plan attached to your email and aerial photographs suggest seven, or even eight/nine, pitch markings in April 2020 within the redline boundary shown in the documentation. Although the screen shot below is not the best they can just be seen (they are better seen on the GoogleEarth)





This screenshot from September 2019 might be a little clearer:





- Again as a result of the limitations of play last season the FA has announced that the 'grassroots' season football would commence next week but extend until the end of June which conflicts with the proposed development. This adds greater importance in ensuring all teams can play when they are required to play.
- As noted above, the proposed use would cause considerable more wear and tear that could take longer for the pitch/playing field to recover. This, therefore, could extend into the next season or beyond. It is unlikely to be the case that once the proposed use ceased that play could recommence on the site.

In relation to the non-turf wicket, the wicket outlined in red appears to be an artificial wicket and falls within the development site red line:



The temporary groundworks are likely to affect the quality of the playing field therefore it is important that a sports agronomist assesses the existing quality of the playing field prior to any works and sets out a specification of works to be undertaken once the proposed use and associated infrastructure is removed to ensure that the playing field is brought back to, at least, its current quality (but ideally better quality). The specification should also set out a timeframe for these works and the playing field/pitches to be established to the required standard that should then inform the temporary relocation of teams and potentially how long any temporary pitches could be required at other sites. In addition, the specification would be able to set out indicative costs to reinstate the playing field and potentially any costs that could be required to create pitches at other sites. This then could require greater certainty for the applicant, Council and Sport England that any deposit would be sufficient to cover the costs. It would also provide Sport England with certainty that the works would be implemented as soon as the proposed use ceases and facilities are removed from the site. Although a matter for the Council to decide, in Sport England's view the applicant should be required to make good any harm caused so any burden from the works should not be on the Council or sporting community.

I hope this is of some assistance. If you have any questions please do not hesitate to ask.

Kind Regards

[Redacted signature]

We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gaile Walters](#)

**From:** [Redacted] <[Redacted]@walthamforest.gov.uk>

**Sent:** 09 March 2021 11:00

**To:** [Redacted] <[Redacted]@sportengland.org>

**Cc:** [Redacted] <[Redacted]@walthamforest.gov.uk>; [Redacted] <[Redacted]@walthamforest.gov.uk>

**Subject:** App Ref: 203496 - Low Hall Sports Ground

Dear [REDACTED]

**Re: App Ref: 203496 - Low Hall Sports Ground**  
**Sports England Ref: PA/21/L/WF/57716**

Please find below responses to each of your comments.

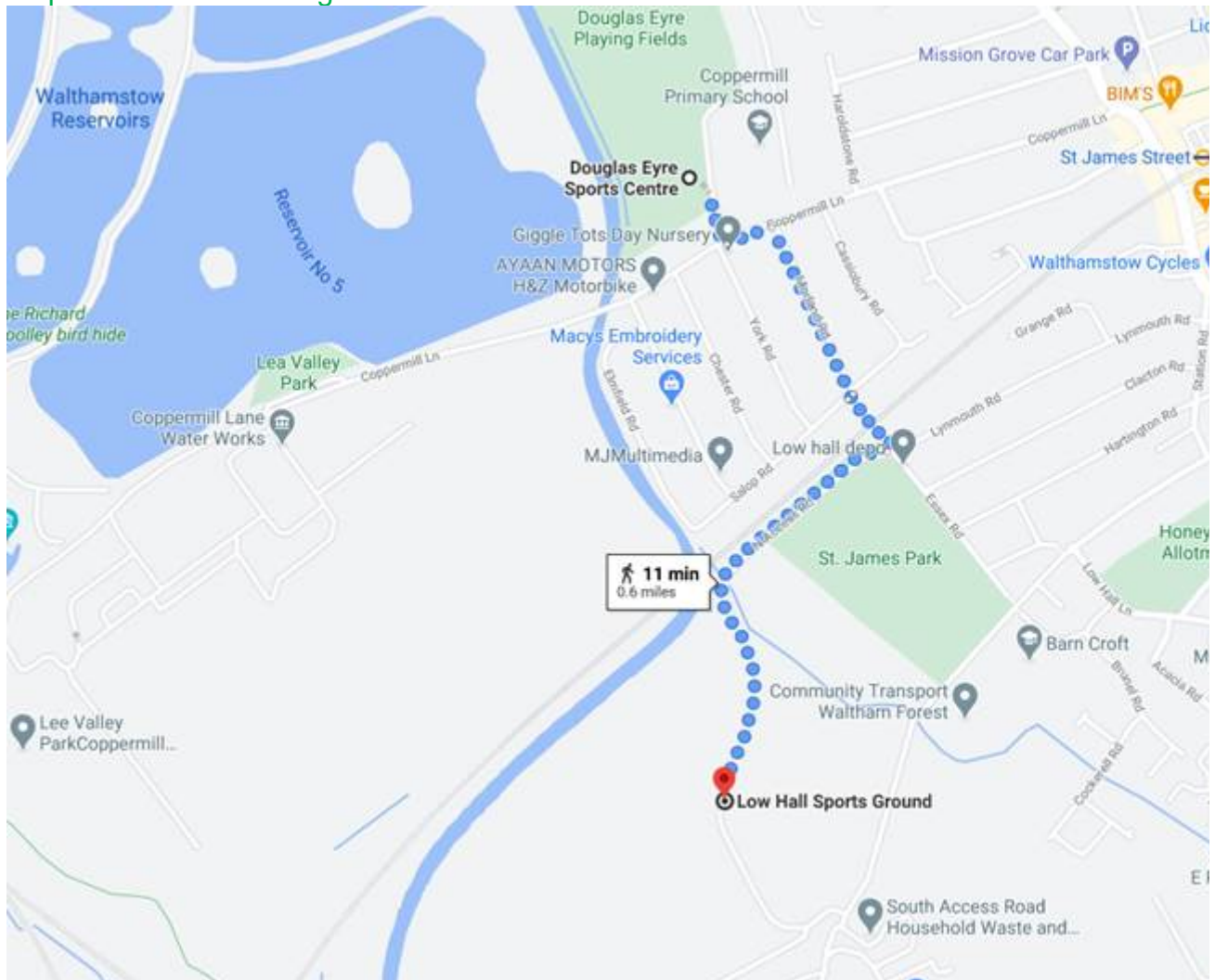
The Design and Access Statement indicates that the existing football pitches would be displaced to other locations within the Borough however no detail has been given where these new playing pitches would be located. It is also unclear whether the playing pitches would be at least the same quality as those temporarily lost at the application site. Could the applicant please provide more detail regarding the proposed replacement/displaced pitches including proposed pitch layouts, playing field quality information/detail and how far any replacement pitch(es) would be from the application site.

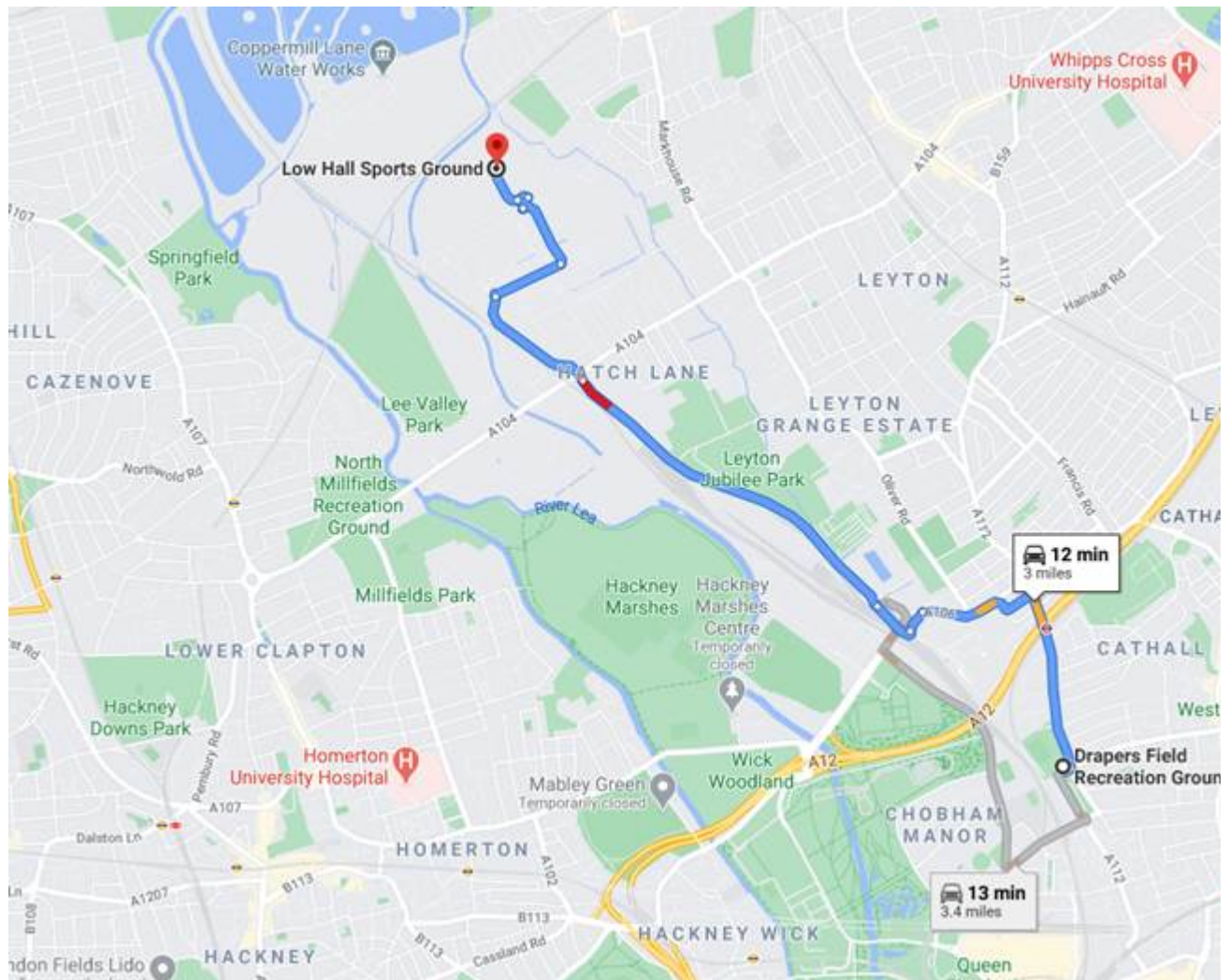
- There is no secure fencing around the site and the football pitches suffer from damage from informal use.
- The site is managed by Waltham Forest Parks & Recreation Team.
- Playgrounds and outdoor gym equipment are available for general use whilst sport grounds and open spaces can be hired by members of the public and outside organisations to hold events and activities.
- Low Hall sports ground is made up of a few different areas including
  - The plateau (12 football pitches)
  - The arena (2 football and one cricket pitch)
  - 3G pitch and carpet pitch.
  - Pavilion
  - Wooded area
- Low Hall also has 9 match equivalents of spare capacity for adult 11v11.
- The site is managed by WF Parks Team and they have confirmed the following:
  - We only have two pitches currently marked on the plateau and have had all season.
  - The number of pitches needed for grass roots football can be accommodated on the area not being used by Secret Cinema.
- Our football season on the grass pitches ends at the end of March and doesn't resume until mid September, therefore we will be able to provide football facilities on time without disruption to the season.
- There are two pitches on the arena and these would be unaffected by the Secret Cinema proposal.
- Our cricket season starts in mid April and runs to the end of August, there is one pitch on the plateau, this sits outside of the Secret Cinema boundary. Last season we only had two/three games up there, these can easily be accommodated elsewhere.
- The cricket pitch on the arena will be in use throughout the performances and would not be impacted by this. Essex CC are aware of the events and did not have an issue with the area being used by Secret Cinema as there is no detrimental effect to cricket
- The small 3G pitch provides some activity in the evenings and weekends but is nowhere near fully booked. During the summer months, the floodlights are not required and there is no reason why the bookings cannot continue as they will not interfere with the performances, the weekend ones are generally Saturday and Sunday mornings so outside of the show times.
- There is plenty of space on the plateau and in St James Park for any informal sport and physical activity to take place, Secret Cinema will not impact the opportunity



Furthermore, the site is close to the following sites:

- Douglas Eyre Sports Ground 7x Adult Football 1x Youth Football 9v9 1x 3G AGP
- Drapers Sports Ground 1x 3G AGP 1x Youth Football 9v9 The current playing surface is less than 5 years old and the pitch needs to be resurfaced within the next five years. 3miles drive
- All pitches are rated as good.





The following sites also have a spare capacity for adult 11v11 in peak period.

Ainslie Wood Sports Ground- 1 match equivalent of spare capacity for adult 11v11 in the peak period – **5 miles form the site /20 min drive**

Blades and Salisbury Hall Playing Fields - 1 match equivalent of spare capacity for adult 11v11 in the peak period.- **4.8 miles form the site /20 min drive**

Chingford Foundation School- 1 match equivalent of spare capacity for youth 11v11 in the peak period.-**6 miles**

Leyton Sixth Form College- 1 match equivalent of spare capacity for adult 11v11 in the peak period-**2.6 miles**

Britannia Playing Fields (also known as Walthamstow Academy)- 1 match equivalent of spare capacity for adult 11v11 in the peak period- **4miles**

The Lammas School and Sports College- 0.5 match equivalents of spare capacity for adult 11v11 in the peak period.**1.5 miles**

Sir George Monoux College- 1.5 match equivalents of spare capacity for youth 11v11 in the peak period-**3.8 miles**

Peter May Sports Centre- 1.5 match equivalents of spare capacity for youth 9v9 in the peak period -**4.6 miles**

Parmiters Sports Ground- 2 match equivalents of spare capacity for adult 11v11 in the peak period.-**4.8 miles**

Match Day Centres- 0.5 match equivalents of spare capacity for adult 11v11 in the peak period-**4.1miles**

Drapers Sports Ground 1x 3G AGP 1x Youth Football 9v9 The current playing surface is less than 5 years old and the pitch needs to be resurfaced within the next five years.

All football pitches in the Borough are rated Good.

The proposal would also appear to result in the temporary unavailability of one non-turf cricket wicket at the site.

Could the applicant confirm whether it is intended that a replacement non-turf wicket would also be installed in another local location and if there any permissions in place to facilitate this replacement provision.

It is also unclear if there is a plan in place to protect the existing non-turf wicket at the site.

- The non-truf cricket wicket sits outside the boundary of the site and won't be affected by the Secret Cinema proposal. We can include a planning condition to protect it.

The documentation indicates that temporary groundworks might be undertaken to facilitate access arrangements but the extent of these works do not appear to be clarified.

- The Construction Method statement advises that there are no plans for excavation on the site, however in limited places it will be necessary to
- break the ground to install temporary tent stakes (approximately 1000mm in length). Ground surveys of the site will take place prior to this.
- The majority of the construction will be of the following nature:
- **Scaffolding:** A number of scaffolding structures will be created on the site – the largest of which will incorporate a large screen for showing films. This structure will be 30m wide and 16m tall. All of the required materials will be transported to site, used for the duration and removed from site at the end of the project.
- The scaffolding structures will be self-weighted and will not require any foundations to be dug or excavations to be made. The scaffolding will likely be
- dressed / themed in line with the performance theme.
- **Marquees** A number of aluminium frame marquees will be used around the site – some with hard ABS plastic walling and some with soft PVC walling. These will be used both as back of house (i.e. non public) storage, office, dressing and greenroom spaces, as well as front of house (i.e. public venues). The structures will likely be dressed / themed in line with the performance theme.
- Flooring options will vary depending on the use of the structure, with options including raised wooden (cassette) flooring in more heavily trafficked areas.
- Stakes will be used to secure the structures in line with manufacturers recommendations.
- Trailers / Cabins: Trailers and cabins will be used on site for a variety of purposes including secure
- storage, office accommodation and toilet / shower provision for cast, crew and audience members.

It is not clear if the quality of the existing playing field has been assessed and whether there is a remediation strategy/specification that would ensure that the playing field would be brought back to its existing quality (or better) once the proposed temporary use has ceased and the temporary infrastructure removed. Please could the applicant provide these details so Sport England can understand the long-term implications of the proposal.

- The applicant has entered into a Legal Agreement with the Councils' Parks team. As part of the agreement with Secret Cinema a damage deposit will be in place to cover any required reinstatement works. Furthermore, In the event of approval, it is also recommended to impose the following planning condition:
- The development hereby approved shall be for a limited period only, carried out between Monday 14 June 2021 and Tuesday 13 July 2021, inclusive of construction and removal. No works for the construction or erection of any of the temporary structures associated with the event shall commence before Monday 14 June 2021. The temporary use of the site for theatrical screenings shall only be open to the public on or after Wednesday 19 July 2021 and shall be discontinued on or before Sunday 12 September 2021. The structures hereby permitted shall be removed from the land and the land restored to its former condition on or before Sunday 19 September 2021 (not including any repair to the amenity grass itself).
- Reason: To enable the Local Planning Authority to review the suitability of the development in the light of circumstances prevailing at the end of the above period and in the interests of the amenities of the area, in accordance with Policy CS15 of the adopted Waltham Forest Local Plan – Core Strategy (2012) and Policies DM29 and DM32 of the adopted Waltham Forest Local Plan – Development Management Policies (2013).

All of the information associated with this application is available online at:

<https://builtenvironment.walthamforest.gov.uk/planning/index.html?fa=getApplication&id=48792>

We have discussed the proposal with Waltham Forest Parks & Recreation Team, and they have confirmed that there is sufficient football pitches on-site to provide football facilities on time without disruption to the season.

A map of Low Hall and a word document containing Waltham Forest Parks & Recreation Team responses to some of the concerns raised by Sports England is attached to this email.

In the unlikely event of unforeseen demand for football facilities in Low Hall, there are many sites nearby and within 5 miles of radius with spare capacity at peak times.

The non-turf cricket-wicket sits outside the site's boundary and won't be affected by the Secret Cinema proposal.

The use is temporary, and the site would be returned to its original condition at the end of the three month period.

I trust the information is sufficient to finalise your assessment; however, please don't hesitate to contact me if you need any further detail.

The application is going to planning committee on the **30th March** and it's important that we get Sports England comments before **25th March**.

Thank you for your help.

[Redacted Signature]

London Borough of Waltham Forest | Development Management | Magistrates Building | 1 Farnan Avenue | London E17 4NX

Email address: [Redacted] [\[Redacted\]@walthamforest.gov.uk](mailto:[Redacted]@walthamforest.gov.uk) [Redacted]

**Any views or opinions expressed in this email are made at officer level and without prejudice, and whilst given in good faith, do not represent a formal decision of the Local Planning Authority.**



From: [REDACTED] <[REDACTED]@sportengland.org>

Sent: 08 March 2021 18:07

To: [REDACTED] <[REDACTED]@walthamforest.gov.uk>; [REDACTED]

<[REDACTED]@walthamforest.gov.uk>

Subject: App Ref: 203496 - Low Hall Sports Ground

Our Ref: PA/21/L/WF/57716

Dear [REDACTED]

Thank you for consulting Sport England on the above planning application.

The site is considered to constitute playing field, or land last used as playing field, as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595). As such Sport England is a statutory consultee.

Sport England has sought to consider the application in light of the National Planning Policy Framework (particularly Para. 97) and against its own playing fields policy. Unfortunately there is insufficient information to enable Sport England to adequately assess the proposal or to make a substantive response. Please therefore could the following information be provided as soon as possible:

1. The Design and Access Statement indicates that the existing football pitches would be displaced to other locations within the Borough however no detail has been given where these new playing pitches would be located. It is also unclear whether the playing pitches would be at least the same quality as those temporary lost at the application site. Could the applicant please provide more detail regarding the proposed replacement/displaced pitches including proposed pitch layouts, playing field quality information/detail and how far any replacement pitch(es) would be from the application site. Sport England would need to understand the detail of any replacement provision so it can assess it is satisfactory to mitigate the loss of existing provision.
2. The proposal would also appear to result in the temporary unavailability of one non-turf cricket wicket at the site. Could the applicant confirm whether it is intended that a replacement non-turf wicket would also be installed in another local location and if there any permissions in place to facilitate this replacement provision. It is also unclear if there is a plan in place to protect the existing non-turf wicket at the site.
3. The documentation indicates that temporary groundworks might be undertaken to facilitate access arrangements but the extent of these works do not appear to be clarified. Please could the applicant indicate the extent of these proposed works so Sport England can understand the impact on the playing field.
4. It is not clear if the quality of the existing playing field has been assessed and whether there is a remediation strategy/specification that would ensure that the playing field would be brought back to its existing quality (or better) once the proposed temporary use has ceased and the temporary infrastructure removed. Please could the applicant provide these details so Sport England can understand the long-term implications of the proposal.

Sport England's interim position on this proposal is to submit a **holding objection**. However we will happily review our position following the receipt of all the further information requested above. As I am currently unable to make a substantive response, in accordance with the Order referred to above, the 21 days for formally responding to the consultation will not commence until I have received all the information requested above.

Should the local planning authority be minded to grant planning permission for the proposal, contrary to Sport England's holding objection, then in accordance with The Town and Country

Planning (Consultation) (England) Direction 2009, the application should be referred to the Secretary of State, via the National Planning Casework Unit.

I would be happy to discuss the requested information further with the applicant and/or the local planning authority if necessary.

Yours sincerely

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

E: [REDACTED] [sportengland.org](mailto:[REDACTED]@sportengland.org)

**London Borough of Waltham Forest**  
**Planning Application - Highways Response**

<b>Planning Application</b>	Temporary use of Low Hall Sports Ground for leisure/entertainment purposes (sui generis) and installation of 142 associated temporary structures, including parking and fencing.
<b>Address</b>	Low Hall Sports Ground, South Access Road, Walthamstow
<b>Number</b>	203496
<b>Planning Officer</b>	
<b>Date of Receipt</b>	24 <sup>th</sup> November 2020
<b>Date of Comments</b>	4 <sup>th</sup> February 2021
<b>Comments</b>	<p><b>Highway network</b></p> <p>It is noted this application is for a temporary, time limited, change of use application for a series of theatrical film screening events: from July to September 2021.</p> <p>It is noted the audience will be directed to arrive and depart from Lea Bridge station and all cycle lane access will be maintained and monitored by the venue staff and security team members. Due to the nature of Argall Estate, the Highway Authority may require some additional signage to be placed on the public highway to alert HGV's driver of the additional pedestrian flows. This will need to be agreed through the NRSWA team.</p> <p>For the first crossing point for pedestrians, Highways recommend using the signalised crossing further down Argall Way just before the mini roundabout, instead of the signalised crossing at junction Lea Bridge Road to avoid any crowding and obstruction to other cyclists and pedestrians.</p> <p>It is noted the Audience Routing Detail mentions a new crossing point across Argall Avenue near the new South Access Road junction. Please note there is new zebra crossing here that can be used.</p> <p>It is noted staff will assist attendees at each crossing point.</p> <p>The document submitted confirmed access will be maintained to all existing buildings, roads and pedestrianised routes which fall outside of the event perimeter.</p> <p><b>Developer highway works</b></p> <p>No comments.</p>

## **Temporary construction arrangements**

It is noted some temporary groundworks may be undertaken to facilitate access arrangements for deliveries and collections during setup and breakdown, the Parks and Leisure Team should be consulted on this.

During venue construction / deconstruction periods deliveries will be made to site between the hours of 0800 and 1800.

All servicing will take place outside of show times.

An Outline Construction Logistic Plan has been submitted with this planning application, but the following comments need to be amended **prior to approval**:

- We appreciate the applicant has included as much detail as possible but only details relating to the construction of the site is necessary to be included.
- Many unnecessary and blurry plans are included in this CLP. Please ensure all plans that are not required as per the CLP guidance are removed and those remaining meet the requirements of the guidance.
- S1.3 Please consolidate this section. Only a brief outline of the overall proposal is necessary.
- S1 The scope and size section can be removed.
- S2.1 - Please use the most up to date Intend to Publish London Plan
- Section 2 is missing a Site Boundary Plan.
- S2.3.1 Information on the construction route must be relocated to S4. Only details of the surrounding areas context need to be included in S2. Please amend the whole of S2 accordingly.
- Figure 1 –This plan is blurry, please revise.
- Figure 2 and 3 can be removed.
- Figure 4 can be removed.
- Figure 5 can be removed. The W19 bus route needs to be included and referred to in section 2.
- S2.3.4 The segregated cycle tracks on Argall Way need to be mentioned here and the cycle path along 'Black Path'.
- Figure 6 is blurry but can be removed. The access shown in figure 6 should be shown on other plans required in section 4.
- S3 the outputs from the CLP tool here are blurry and need to be amended/revised. Thank you for listing the limitations of the CLP and explaining how it fits in with your site.
- S3 Details of the show dates can be removed from the CLP.
- S4 Please provide details on the wider route.
- S4 Banksman should oversee the movement of vehicles and Traffic Marshalls overseeing the safety of pedestrians and cyclists.
- S4 Figure 8 should be removed.
- S4 Figure 9 is blurry and needs to be amended.

- S4 Details of the access arrangements for the buildings around the site need to be removed from this section and included within S2 instead.
- S4 Figure 10 and 11 are unclear. Figure 10 can be removed, and the routing text should be made clear that there is no vehicular access to the site from Markhouse Avenue. Figure 11 should not be necessary if the surrounding cycle infrastructure is mentioned in S2.
- S4 The information under 'Operation conditions and site standard for construction' can be removed.
- S4 No vehicle should be waiting on public highway at any time.
- The plans provided in S4 must be revised to meet the guidance. Please see the TfL CLP guidance for more details. A site setup plan is missing.
- S5.1.1 The section on contract compliance can be moved to S7.
- S5 Please consolidate the information under S5.1.1. The Vulnerable Road User Safety section can be removed.
- S5.1.1 Please can you confirm what you mean within the 'Local Access Route' section.
- S5 Please remove the list of bullet points under each section that explain the positives of each planned measure. Thank you for including this information but it is not necessary.
- S6 the CLP tool is unclear. This need to be revised for each output can be seen clearly.

Highways note there are considerable comments that need to be addressed for the Outline CLP. Therefore, if the Outline CLP cannot be amended in time, Highways would be happy for a Detailed CLP to be secured as a planning condition.

### **Public highway boundary**

No comments.

### **Parking**

It is noted a total of approximately 40 car parking spaces for staff and contractors are proposed within the site boundary and along the private access road. This will need to be agreed with the Parks and Leisure Team.

A total of ten disabled parking spaces are provided within the private road, available on a pre-bookable first come, first served basis. A plan showing where these bays will be located including transfer areas and a safe accessible route up to the show area is required for the Parks and Leisure Team to review and comment on.

It is noted two designated taxi / pick up area off Argall Avenue are proposed in collaboration with the Argall BID. All attendees should be discouraged from using taxi or pick up and drop off points. Please confirm how and when this will be made public to attendees **prior to approval.**

These two collection points areas are not public highway and the applicant should contact the landowner for approval. Please note the footway and cycle lane that runs through one of the car parks is public highway. This area should be managed accordingly to ensure the safety of this route.

Highways recommend only one collection point area is set up at the beginning of the event, and the second one added at a later date if necessary.

It is noted 50 cycle parking spaces are proposed. Staff and visitor cycle storage areas must be kept separate.

Transport policy should be consulted on cycle parking quantum. If additional cycle storage is required, can the applicant confirm further provision will be provided.

**Road safety**

No comments.

**Walking and cycling**

No comments.

**Street lighting**

No comments.

**Lead Local Flood Authority**

No comments.

**Drainage**

No comments.

**Impact on public transport**

No comments.

**LBWF Network Operations**

No comments.

**Street naming and numbering**

No comments.

**Strategic Route Network (TfL)**

This site is not located on the strategic route network.

**Summary of planning conditions or legal matters**

No comments.

Dean Bradley House  
52 Horseferry Road  
London  
SW1P 2AF

enquiries@wildlondon.org.uk  
www.wildlondon.org.uk



Planning Department  
London Borough Waltham Forest  
Magistrates Building, Town Hall Complex  
Walthamstow Town Hall  
Forest Road  
Walthamstow  
London E17 4JF

9<sup>th</sup> February 2021

Dear Madam or Sir,

**LOW HALL SPORTS GROUND, SOUTH ACCESS RD, LONDON, E10 7JA.**

**PLANNING APPLICATION REF: 203496**

*Temporary use of Low Hall Sports Ground for leisure and entertainment purposes (sui generis) and installation of 142 associated temporary structures, including parking and fencing.*

London Wildlife Trust ('the Trust') has been made aware of the above application. Although we manage Walthamstow Wetlands on behalf of the Council and Thames Water, to my knowledge we have not been consulted on this proposal, or been contacted by the applicant in their consultation in the autumn.

**Ecological assessment**

We note that since the original consultation has closed, that an Ecology Report has been submitted.<sup>1</sup> Whilst this provides a baseline it is based on a single 1-day survey carried out in early January, the least appropriate time to assess the site, backed up by some desk assessments. These constraints are not referenced in the Ecology Report, and the conclusions should have been caveated on this basis.

We note that the application site holds only a limited biodiversity interest. But even this is under-played in the Ecology Report. The survey will not have picked up a range of species that are known to use the site, especially in spring and summer, including kestrel, and little owl. The bordering shrubs and trees indicate a typical flora, but many species simply will have been dormant or hidden due to the time of year. Even so, the structure of the vegetation will be important for breeding birds, some of which will be either fledgling chicks, or on a second or even third brood by the anticipated start of the event in July. It will also support invertebrates and small mammals. The known presence of kestrel suggests that its prey items are locally present (if not active in January).

Low Hall Wood Site of Local Importance for Nature Conservation stands on the north-east edge of the application site (200m distant), the Lee Valley Site of Metropolitan Importance for Nature Conservation borders the Ground's northern edge, Walthamstow Marshes SSSI to lie close to the west. Walthamstow Wetlands, also a SSSI and SPA, is less than 700m distant to the north-west. Whilst the site's context is referenced in the Report it simply

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<sup>1</sup> GS Ecology (2021). *Ecological Assessment of the Proposed Theatrical Film Screening Event at: Low Hall Sports Ground, South Access Road, London E10 7JA*, 16<sup>th</sup> January 2021.

states that these sites “*will be unaffected by the proposals.*” It appears to simply discount the possibility of the indirect impacts of light and noise, and or that species from these sites utilise Low Hall Sports Ground for foraging or hunting. No safeguards for these nationally and internationally important conservation sites have been recommended.

The report makes a number of other assertions without any evidence to support them, eg; *Disturbance*

*4.13 The proposals will not result in any increase in recreational use of any sites of importance for nature conservation or nearby habitats. Visitors will travel using public transport and will be encouraged by the organisers to do so.*

However, the event’s infrastructure will effectively close almost half of the site to the public for three months in summer; this will push those that use Low Hall Sports Ground into a smaller space closer to the areas of nature conservation interest. It may also simply disperse others to go elsewhere, such as Walthamstow Marshes. This may not be the case but the contrary assertion above (in 4.13) is based on what?

## **Conclusions**

The report’s conclusions (section 5) are worryingly precise, that there will be ‘no impact’, (our comments underlined below):

*5.1 The field is not a “priority habitat” as defined in the NPPF and is very unlikely to host any protected or notable species.*

Maybe, but it still supports biodiversity; this is making an assumption based on one 1-day site visit in January.

*5.2 The Walthamstow Marshes SSSI and the Lee Valley SPA are within 1km of the site and there is a local wildlife site (Low Hall Woods) and a watercourse (The Dagenham Brook) within 200m. These will be unaffected by the proposals.*

Based on what? Surely the impacts will probably be minor, but even this is not explored.

*5.3 The lighting scheme has been designed to ensure that the Dagenham Brook, Low Hall Woods and three trees that have features suitable for use by roosting bats will remain unlit.*

The site appears to be used by foraging bats from nearby environs; a survey at a more appropriate time should provide a stronger rationale for this statement one way or the other. No bat surveys have been recommended.

*5.4 In summary there should be no ecological constraints to proposals to use part of Low Hall Sport Ground as a temporary outdoor theatrical film screening area over the summer months.*

No question has been raised that there might be some impacts, which might be easier to determine later in the spring when a more accurate picture of the site’s biodiversity can be ascertained. This conveniently avoids the need for any mitigation, or an attempt to secure a net gain for biodiversity on a site that could be enhanced.

It is, in our view an inadequate assessment of the application, and does not provide enough robust information for the Council to make an informed decision on the application.

## **Recommendations**

We acknowledge the application site has a limited biodiversity interest, but it does support some wildlife value particularly on its northern and western fringes. Whilst we appreciate that only a temporary use is proposed it will result in considerable noise and light both during the afternoon and well into the night for a period of over three months. This will incur



some impacts on Low Hall Sports Grounds' ecological value, which may also be influenced if the weather over the period is particularly dry or wet.

We therefore recommend in line with Local Plan policy DM35 *Biodiversity and Geodiversity*<sup>2</sup> that the following are conditioned if the Council were minded to grant permission:

- An ecological assessment of the Low Hall Sports Ground over April to June to gain a more accurate assessment of what species are present, including:
  - a bat emergence and flight survey
  - a breeding bird survey
- A plan to mitigate any impacts that might arise following analysis of these additional surveys, including, but not confined to, changes to lighting and noise buffering, and taking into account safeguarding sensitivities of the nearby SSSIs and SPA;
- A plan of ecological landscape enhancements for Low Hall Sports Ground, to mitigate for the disruption to the grounds and secure some net gains for biodiversity, to be delivered within six months of the closure of the event.

If you wish for any further details on the above points please don't hesitate to contact me.

Yours faithfully,

A large black rectangular redaction box covering the signature and name of the sender.

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<sup>2</sup> LBWF *Development Management Policies* Local Plan, Adopted October 2013

## Low Hall Sports Ground

### HEADS OF TERMS

October 2020  
Page 1 of 7

**The Mayor and Burgesses of London Borough of Waltham Forest** of Waltham Forest Town Hall, Forest Rd, London E17 4JF

**Secret Group Ltd (company number 05071764)** of 230 City Road, London, EC1V 2QY

#### AGREEMENT

These heads of terms are not intended to create any legally binding obligations. They are subject to contract, planning, licensing and completion of formally executed legal documentation.

These heads of terms are confidential to the intended parties and to their professional advisors.

#### PARTIES

##### Landowners ("Council")

**The Council of the London Borough of Waltham Forest**  
Waltham Forest Town Hall  
Forest Road, London  
E17 4JF

[REDACTED]  
[REDACTED]  
[REDACTED]

Landowners' Solicitor(s) / Legal representative(s)

X

##### The Hirer

**Secret Group Ltd**  
Ground Floor  
230 City Road, London  
EC1V 2QY

[REDACTED]  
[REDACTED]  
[REDACTED]

Tenant's Solicitor

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

## Low Hall Sports Ground

### HEADS OF TERMS

October 2020  
Page 2 of 7

#### DEFINITIONS:

**Damage Deposit:** means the sum of £6,000 payable by the Hirer to the Council as security for any damage caused to the Site (fair wear and tear expected) or any neighbouring property by the Hirer, its Supplier(s), its employees or agents during the Hire Period, or to cover liability arising for the Council resulting from breach of the Agreement by the Hirer or its Supplier(s)

**EVENT:** The staging of immersive interactive entertainment with ancillary bars and restaurants for an audience of up to 4,999 people per night (including staff) for up to 40 nights during the Hire Period

**Hire Agreement:** The formal, legally binding, contractual agreement for the hire of the Site between the Council and the Hirer to be entered into.

**Hire Fee:** A ground hire of £60,000 plus VAT plus any additional services such as planning, licencing and waste management to be mutually agreed in advance.

**Hire Period:** The period during which the hire will begin and end, from 14<sup>th</sup> June 2021 to 19<sup>th</sup> September 2021, inclusive of Build, Strike and Event running

**Site:** The area of land situated in and forming part of Low Hall Sports Ground, South Access Road, London, E17 8AX as shown edged in red line on the attached map

**Supplier:** means any company, charity or individual(s) engaged by the Hirer to perform any duties or activities at the Event(s), to include any employee, contractor (subcontractor) or agent of the Hirer, To clarify, this will include any artists, traders, concessions, service providers, production suppliers.

**Truck Access Route:** The route shown in blue line on the attached plan

**Truck Access Works:** Laying trackway, installing Heras fencing and additional marshalling along the Truck Access Route

#### Agreed Terms:

#### Landowner ("COUNCIL")

The Mayor and Burgesses of the London Borough of Waltham Forest of Waltham Forest Town Hall, Forest Rd, London E17 4JF

#### HIRER

Secret Group Ltd (SGL)

Country of incorporation/registration: England and Wales

## Low Hall Sports Ground

### HEADS OF TERMS

October 2020

Page 3 of 7

Company number: 05071764

Registered office address: 230 City Road, London, EC1V 2QY

#### PROPERTY

##### Site

The area of land situated in and forming part of Low Hall Sports Ground, South Access Road, London, E17 8AX as shown edged in red line on the attached map.

It is agreed that the Hirer will have an exclusive right to occupy the Site for the duration of the Hire Period, subject to the right of the Council to enter the Site to comply with its obligations under the Hire Agreement and to inspect the Site to ensure that the Hirer is complying with its obligations under the Agreement.

##### Car Parking

The Hirer may occupy all available car parking spaces within the Site during the Hire Period. These are marked on the attached plan.

##### Building Adjacent to the Site

The Hirer would like to investigate the possibility of utilising the buildings adjacent to the football pitch for the purpose of administration and production office space. These are marked with a red line on the attached map. The Hirer shall submit their proposal(s) for the buildings adjacent to the football pitch to the Council in writing as soon as practicable and in any event not less than 28 days before implementing their plan(s). The Council shall then consider the Hirer's proposal(s) and notify them as soon as practicable whether or not they are permitted.

#### HIRE PERIOD

The Council grants exclusive occupation of the Site for the Hire Period for the purpose of staging the Event.

If the Hirer wishes to extend the length of the Hire Period, this must be agreed in advance with the Council.

#### USE

The Hirer plans to stage a number of 'immersive' film events on the Site

"Event"	Secret Cinema Presents [ ]
"Event Site"	See above
Capacity	4,999 (per night)
Event Times	TBC

## Low Hall Sports Ground

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The following is subject to Planning and License:

On Site Build – Show 1	From 14 <sup>th</sup> June 2021
Technical Rehearsal	From Thursday 1 <sup>st</sup> July 2021
Dress Rehearsal	Wednesday 7 <sup>th</sup> July 2021
Preview 1	Friday 9 <sup>th</sup> July 2021
Preview 2	Tuesday 13 <sup>th</sup> July 2021
Week 1 – Show	Wednesday 14 <sup>th</sup> July – Sunday 18 <sup>th</sup> July 2021
Week 2 – Show	Wednesday 21 <sup>st</sup> July – Sunday 25 <sup>th</sup> July 2021
Week 3 Show	Wednesday 28 <sup>th</sup> July – Sunday 1 <sup>st</sup> August 2021

On Site Build – Show 2	From 19 <sup>th</sup> July 2021
Technical Rehearsal	From Friday 6 <sup>th</sup> August 2021
Dress Rehearsal	Thursday 12 <sup>th</sup> August 2021
Preview 1	Saturday 14 <sup>th</sup> August 2021
Preview 2	Monday 16 <sup>th</sup> August 2021
Week 1 – Show	Wednesday 18 <sup>th</sup> August – 22 <sup>nd</sup> August 2021
Week 2 – Show	Wednesday 25 <sup>th</sup> August – 30 <sup>th</sup> August 2021
Week 3 - Show	Wednesday 1 <sup>st</sup> September – 5 <sup>th</sup> September 2021
Week 4 - Show	Tuesday 7 <sup>th</sup> September – 12 <sup>th</sup> September 2021
De-Rig	Monday 13 <sup>th</sup> September – 19 <sup>th</sup> September 2021

The Hirer will apply for a Time Limited Premises License for the Site. This will cover the Sale or Supply of Alcohol and Regulated Entertainment. The Hirer will also apply for a Temporary 'Change of Use' Planning on the Site. The Hirer is to satisfy and comply with all conditions on the premises licence and planning permissions.

#### HIRE FEE

Subject to grant of the Time Limited Premises License and Temporary 'Change of Use' Planning Permission the Hirer shall pay the Hire Fee to the Council. For the Purposes of Clarity: The Hire Fee represents the total cost of the ground hire of the Site for the duration of the Hire Period (including Build and Strike of both shows).

Upon signature of the Agreement the Hirer shall pay a returnable deposit of 10% of the Hire Fee to the Council. The Hirer will pay any VAT due on the Hire Fee upon receipt of a valid VAT invoice.

The Hirer will cover all reasonable Council staff costs in relation to the Event, to be mutually agreed in advance

#### TRUCK ACCESS WORKS

The Hirer requires Truck Access Works to be carried out at the Site and the Council agrees to permit the Hirer to carry out the Truck Access Works, provided that the Hirer returns, repairs or reinstates the Truck Access Route to the condition it was in prior to the commencement of the Truck Access Works as modified by the provisions of the section below headed Ground protection, to the reasonable satisfaction of the Council

## Low Hall Sports Ground

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#### UTILITIES

If the Hirer utilises water or electricity connections to Low Hall Sports Ground a meter will be installed and the Hirer will pay cost price for the water/electricity that it uses during the total Hire Period. If there is a meter already in existence the Hirer and the Council will take a reading before and after occupancy

The Hirer would like to investigate the possibility of utilising the mains drainage on site. The Hirer shall submit their proposal(s) for utilising the mains drainage on site to the Council in writing as soon as practicable and in any event not less than 28 days before implementing their plan(s). The Council shall then consider the Hirer's proposal(s) and notify them as soon as practicable whether or not they are permitted.

No extra costs will be charged to the Hirer for access to these facilities.

#### GROUND PROTECTION

The Council is responsible for ensuring that during the Hire Period, the Site will be readily and freely available to stage the Events, in a safe condition for the holding of the Events, and fully compliant with all applicable law before the start of the Hirer's occupancy.

The Hirer will pay a £6,000 refundable deposit against 'Damage' and to cover liability resulting from breach of the Hire Agreement by the Hirer or its Supplier(s). "Damage" would be deemed to be that above the level of wear and tear which would be expected based on a number of events of 4,999 (daily) capacity. – i.e. wear and tear not requiring remediation would include but is not limited to:

- Shorter grass where footfall has worn grass levels to earth level.
- Discolouration of grass beneath structures.
- Minor surface scuffs or scrapes to soil and grass area or imprint of trackway

Damage could include but is not limited to:

- Large holes, tears or tyre channels cut into the grass
- Large holes, dents or markings to park / street furniture

The Hirer and the Council will undertake and sign off a Site assessment (including neighbouring property) to include photographic evidence to record the condition of the Site and neighbouring property immediately before and after its occupancy of the Site.

#### OTHER WORKS

Joint works can be discussed and agreed in advance, but they sit outside of the Hire Agreement.

All planning, licensing, road suspension and parking suspension costs relating solely to the Event will be borne by the Hirer.

#### SENSITIVE ISSUES

The council will inform the Hirer prior to the Hire Period or as soon as reasonably practicable of any sensitive issues / history relating to local stakeholders, residents and nearby wildlife that may impact the granting of Licenses and Planning or the smooth running of the Event.

## Low Hall Sports Ground

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#### IP

The parties agree that "Secret Cinema" concepts, formats and brands (the 'Concepts, Formats and Brands') are wholly owned by the Hirer and the Council shall have no rights to use the Concepts, Formats and Brands without the express written permission of The Hirer for any further events, Publicity or marketing purposes.

#### OTHER COSTS

Each party is responsible for its own legal costs in connection with this Agreement.

How will security/stewardship be handled?

What insurances will be required?

Compliance with health and safety and equalities policies and legislation – ensure event is accessible to wheelchair users for example

Noise management – will noise be an issue?

Signed: .....  
(Duly authorised signatory)

Date: .....

Name:.....  
On Behalf of Secret Group Ltd

Signed: .....  
(Duly authorised signatory)

Date: .....

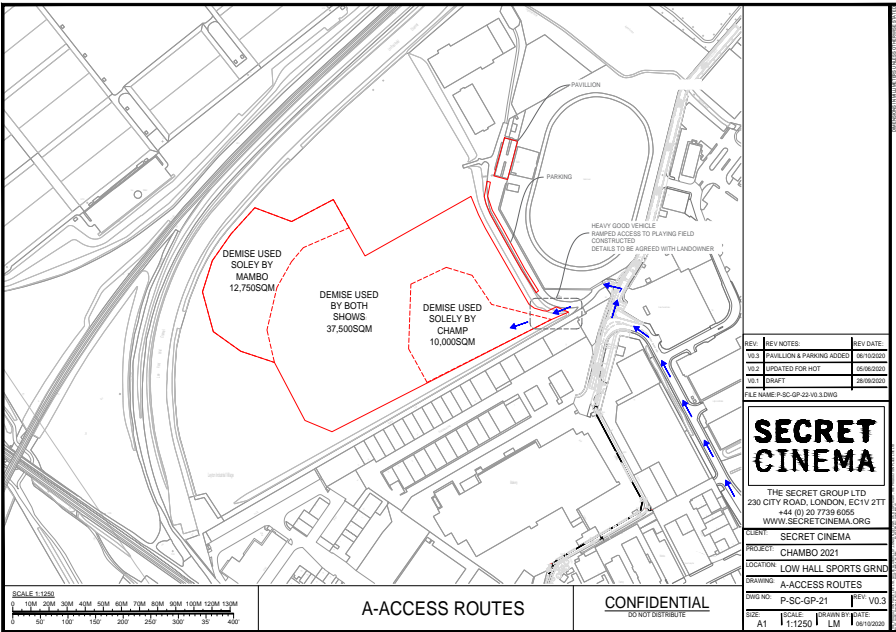
Name:.....  
On Behalf of The Council of the London Borough of Waltham Forest

Low Hall Sports Ground

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APPENDIX





## Secret Cinema enquiries February 2021

Low Hall sports ground is made up of a few different areas including

- The plateau (12 football pitches)
- The arena (2 football and one cricket pitch)
- 3G pitch and carpet pitch.
- Pavilion
- Wooded area

### **1 The consultation process was inadequate, which is contrary to the council's stated commitment to civic engagement in the Waltham Forest Proposed Submission Plan Review October 20**

The Council's statutory obligation in relation to neighbours/occupiers come under article 15 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (consultation requirements); for this type of development the Council is required to mount a **site notice** on or near the land for at least 21 days prior to determining the application **or** to serve the **notice on any adjoining owner or occupier**, and place a statutory notice advertisement in the local newspaper.

The Council's adopted Statement of Community Involvement states:

On a site by site basis, all neighbours the Council considers **likely to be directly affected** by a proposal are notified of the application by letter.

In this instance the Local Planning Authority sent letters to the 76 adjoining land owners / occupiers and 3 site notices were displayed near the site on the 18 November. A press notice was also published in the local newspaper on the same date. This statutory consultation gave 21 days to comments on the application in line with statutory requirements. Properties on Blackhorse Road, St James Street and near Walthamstow Central are not adjacent to the application site and therefore did not receive a letter.

The submission of the planning application coincided with the planning department's software upgrade, unfortunately as a result of this details of planning applications submitted from Mid November to mid December could not be put on the public website. The timing of the application was unfortunate, however the consultation letters sent to residents on 18 November 2020 explained this and offered to email application material where requested. The consultation period has also been extended to 15<sup>th</sup> Feb 2021 to give residents sufficient time to review the submitted information and comment on the application. As such officers are satisfied that the Council followed the proper procedures, relevant legislation and guidance on the publicity of applications.

The 7- 10 days timescales relate to the applicant's consultation which they organised as part of their wider community engagement, this is separate to the Council carrying out its statutory consultation as Local Planning Authority (LPA).

The WF Stakeholder Relations and Community Engagement Manager, who organised the event with the applicant informed the planning department that 120 residents booked but only 45 residents attended the event. Council Planning Officers attended these events as observers and noted the concerns raised, including access via residential streets and losing

a sizeable portion of the sports ground for the summer. However, overall, the event went smoothly, and residents were satisfied with the engrailment process.

## **2 A reduction in access to green spaces, essential for health and well-being, in an area already deficiently served at a time when many residents use the sports grounds and park, alongside activity groups.**

The proposal by Secret Cinema is only a temporary proposal for 3 months and during the time residents will have access to 50% of the plateau, all of the arena, the outdoor gym and the artificial turf pitches as a full perimeter path around the site. In addition Low Hall woods and St James Park will still be fully accessible throughout for the enjoyment of residents.

So although there is a temporary reduction in access to some of the green space there is still enough for essential health and well-being.

The proposal is for installation (and de-installation) of temporary structures for a multi-purpose venue space to hold cultural events for a temporary period of 3 months (14 June 2021 to 19 September 2021). Low Hall Sports Ground is designated as Metropolitan Open Land, which has the same status as Green Belt.

Planning Officers are assessing the application against the relevant local and regional planning policies and will consider if the delivery of a temporary cultural and leisure uses, which would bring new jobs and wider benefits to the local community, outweigh any potential harm, including the temporary loss of open space. If the scheme is recommended for approval mitigation measures would be secured via a planning condition to ensure that the land is returned to its existing condition. The majority of the Low Hall would remain accessible to residents though the day.

## **3 A major disruption to community use / organisational programmes for young people and adults including vulnerable, at risk and hard to reach groups, working to develop skills, resilience and well-being.**

The event in Low Hall sports ground is not a disruption to organisational programmes and it will still openly provide sport and recreation facilities formally and informally.

- The football season on the grass pitches ends at the end of March and doesn't resume until mid September, therefore there will be no disruption to the season.
- There was only two pitches out of 12 currently marked on the plateau during the 20/21 season. There are a further two pitches on the arena and these will be unaffected by the Secret Cinema proposal
- The cricket season starts in mid April and runs to the end of August, there is one pitch on the plateau and this sits outside of the Secret Cinema boundary. Last season there were only two/three games on the plateau and these can easily be accommodated elsewhere. The cricket pitch on the arena will be available for cricket bookings throughout the performances and would not be impacted by Secret Cinema. Essex CC are aware of the events and did not have an issue with the area being used by Secret Cinema as there is no detrimental effect to cricket
- The small 3G pitch has some bookings in the evenings and weekends but is nowhere near fully booked. During the summer months, the floodlights are not required and there is no reason why the bookings cannot continue as they will not interfere with the performances, the weekend ones are generally Saturday and Sunday mornings so outside of the show times.

- There is plenty of space on the plateau and in St James Park for any informal sport and physical activity to take place.
- The other uses are informal dog walking and jogging etc and secret cinema have stated there will be a perimeter path around the site for this to continue.
- Secret cinema is working with the Council's Employment Business and Skills service to offer aspirational employment and skills training to the those from low socio-economic backgrounds and hard to reach groups in order to make a positive impact on the neighbouring community. Working in partnership with the council Secret cinema will mitigate for the disruption and amplify the offer to develop skills, resilience and well-being and provide vital work experience to those most severely impacted by COVID 19

#### **4 A lack of strategic planning for repairing the environmental damage to the ecology of the park with regard to pollution, wildlife and biodiversity.**

As part of the agreement with Secret Cinema a damage deposit will be in place that will cover any required reinstatement works.

In terms of Biodiversity and Geodiversity Policy DM35 of the Development Management Policies (2013) advises that A) Development proposals will not normally be granted planning permission where they pose adverse direct or indirect effects on any land or area within the identified Sites of Special Scientific Interest (SSSI), Sites of Importance to Nature Conservation (SINC), Special Areas of Conservation (SAC), RAMSAR sites, Special Protection Areas (See Schedules 13 to 16 and 24 to 26 and the Policies Map) or to protected or priority species.

The application is supported by an Ecology Report which examines the potential impacts of the development on existing wildlife habitats. The statement concludes that there is no priority habitat within the application site and priority habitats within 2 m of Low Hall sports ground would be unaffected from the theatrical screenings. The proposal would result in a small increase (3db at 4m height) in on a small section of the SSSI and Low Hall Wood LWS, however all increase and will have no discernible impact on wildlife. The site will be lit by pole mounted floodlights, which would be switched off at 11p.m (except security lights) with rear shields to minimise light spillage, however , there will be no light spillage onto the Dagenham Brook or on the poplar trees that have features suitable for use by roosting bats. Furthermore, none of the trees adjacent to the site have features that are suitable for use by roosting bats. As such roosting bats would not be a constraint to the proposals. As part of the planning assessment the Council's Nature Conservation Officer has reviewed the application material and agrees with the findings of the report which states that proposed theatrical film screening summer event at Low Hall Sports Ground, would have no discernible effect on existing priority an non priority habitats. This assessment will form part of the overall planning assessment when the report is presented to Planning Committee.

#### **5 An apparent disregard for the increased risk of crime and disorder, public nuisance and public safety**

Experienced Site Operations team will manage the full show. The audience to staff ratio will be approximately 1:20 which is above recommended industry standards.

All security staff will be SIA badge holders and experienced in managing big crowds on large scale events.

All performers, front of house, bar staff, food traders and security will be trained in emergency evacuation procedures.

Ingress and egress route will be manned by our front of house team.

Litter pickers will walk the route on ingress and egress, to and from the station.

Secret Cinema have a robust security team conducting regular patrols alongside the CCTV, lighting and visually open design, this should reduce the opportunities for crime to occur. Previous years have also followed these measures and it does not appear to be a disproportionate amount of crime that would concern Met Police in how these events are run. The “secret” nature of revealing its location and lack of nearby parking does also limit some of the opportunities for crime to occur. As such officers are satisfied that the proposed development for theatrical screening would not increase the risk of crime and disorder, public nuisance and public safety. This assessment will form part of the overall planning assessment when the report is presented to Planning Committee.

## **6 An increase in noise and air pollution to local residents**

The introduction of the bus gate on South Access Road in Autumn 2020 has reduced the vehicle traffic away from residents. With this in place there will be little vehicle pollution from visitors accessing the Secret Cinema and as stated the main arrival point will be from Lea Bridge Station.

Concern has been expressed with respect to increased air pollution. Officer’s view is that this concern is unwarranted in this case. Visitors to the event would rely on public transport and vehicle-related emissions would be limited. The proposal would not introduce new air pollutants such as biomass boilers or Power plants. The construction of the temporary set is unlikely to expose people to harmful concentrations of air pollutants, such as dust. The temporary use of a grassed land would not have an adverse effect on biodiversity. Furthermore, the Council's Protection Services (part of Environmental Health) has reviewed the application and raised no concerns in terms of air pollution implications.

In terms of noise, Policy DM24 Paragraph D) Paragraph C) of the Development Management Policies (2013) states that noise sensitive uses such as residential should be located away from major sources of noise pollution and vibration, unless appropriate mitigation can be provided.

The closest identified noise sensitive receptors are located 25m to the north on the junction of Salop Road and Elmfield Road, to the east on Essex Road and streets leading off Cockerell Road beyond Low Hall Depot, to the south on Overton Road, beyond Leyton Industrial Village, and to the west in Upper Clapton, beyond Walthamstow Marshes.

The application is supported by a Noise Management Plan which explain how noise from construction works and during the production would be managed. The Council's Protection Services (part of Environmental Health) has reviewed the application and raised no concerns in terms of noise pollution. Should the application be granted permission a condition would be imposed that no amplified music shall be played in the outdoor areas, audible beyond the

boundary of the site, beyond 23:00 without the prior written approval of the Local Planning Authority.

## **7 No tangible benefit for the most affected local residents or businesses**

Local businesses will be encouraged to support the event through food and beverage outlets on site, the Council will also work with secret cinema to ensure pre and post event off site supply chain opportunities are advertised to local businesses

Residents who participate in the Secret cinema engagement activities with the EBS team will have an opportunity to gain work experience at the events and potential employment opportunities on the second show run. 1,500 complimentary tickets are also available to these participants so that those from the lowest socio-economic means can participate and benefit from the activities.

## **8 Effects on Local schools and young people**

The temporary event is being held over the summer period so will not have any effect on schools.

## **9 Black path cycle route**

During 2020 Highways completely relayed and resurfaced the black path and widened it in places where possible. This allowed Highways to increase the width of the cycle track in places without compromising the footpath, reducing occurrences of conflict between users.

Highways also improved the lighting, introduced new pedestrian and cycle crossings at each end, and installed all the infrastructure for 5 CCTV cameras. The wall running along Allied Bakeries property was also repaired and rebuilt.