

The Fairground Site, Wanstead Flats

in the London Borough of Redbridge

planning application no. 2643/10

Strategic planning application stage 1 referral (new powers)

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

The proposal

Temporary use of land for a period of 90 days between June and September 2012 during the Olympic and Paralympics Games for the operation of a muster briefing and deployment centre for the Metropolitan Police Service. To include 3.4m high perimeter fence, up to four marquees (briefing and dining facilities) kitchen complex, up to 30 temporary cabins (providing office accommodation, first aid facilities, radio repairs, general storage and WC facilities). Three blocks of 18 stables each, dog van area, parking for up to 375 vehicles, safety and security lighting.

The applicant

The applicant is Metropolitan Police Authority.

Strategic issues

The main issues are whether 'inappropriate development' in the **Green Belt** for purposes of a temporary muster briefing and deployment centre for the duration of the **Olympics** is acceptable in strategic planning policy terms; whether 'very special circumstances' have been identified as required by PPG2; and whether the new development would harm the open character of the Green Belt.

Other relevant strategic issues are **urban design**, **biodiversity**, and **transport**.

Recommendation

That Redbridge Council be advised that the application complies with the London Plan, for the reasons set out in paragraph 42 of this report and does not need to be referred back to the Mayor. The Council should, however, take account of the comments made in paragraph 43 of this report.

Context

1 On 18 January 2011 the Mayor of London received documents from Redbridge Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 28 February 2011 to provide the Council with a statement setting

out whether he considers that the application complies with the London Plan, and his reasons for taking that view. For this application the Mayor has delegated his planning function to Sir Simon Milton, Deputy Mayor for Policy and Planning. This report sets out information for the Deputy Mayor's use in deciding what decision to make.

2 The application is referable under Categories 3D and 3F of the Schedule to the Order 2008:

"Development on land allocated as Green Belt or Metropolitan Open Land in the development plan, in proposals for such a plan, or in proposals for the alteration or replacement of such a plan and which would involve the construction of a building with a floorspace of more than 1,000 square metres or a material change in the use of such a building."

"Development for a use, other than residential use, which includes the provision of more than 200 car parking spaces in connection with that use."

3 Once Redbridge Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision, as to whether to direct refusal; or allow the Council to determine it itself, unless otherwise advised. In this instance, Redbridge Council need not refer the application back to the Mayor.

4 The Deputy Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The 3.46 hectare site is located in the southwest corner of Wanstead Flats, a 182 hectare open space located at the southernmost tip of Epping Forest. The site is situated to the north of Sidney Road between Centre Road to the east and Lake House Road to the west, both of which transect (north to south) the wider flats.

6 The site is designated Green Belt in Redbridge's local development framework. It is also designated Heritage Land and a Site of Nature Conservation Importance. A Site of Special Scientific Importance is immediately north of the proposed site. A small public car park with access from Lake House Road is included in the site, which is otherwise open grassland. An informal horse-riding track crosses the south of the site.

7 Jubilee Pond lies to the southwest of the site but not within the boundary of the site. A children's playground is to the south of the pond. There are residential properties to the south and southwest of the proposed site. The rest of the site is bound by the wider park, including formal playing pitches to the northeast.

8 The site is located more than 1.6km away from the A12 (Eastern Avenue) which forms part of the TfL road network, and which will also form part of the Olympic route network in 2012. There two bus routes within walking distance of the site and Wanstead Park Overground station is located about 400m away from the proposed southern site access. The site therefore records a low public transport accessibility level of two, out of a range of one to six, where six is excellent.

Details of the proposal

9 The application is for temporary use of land for a period of 90 days between June and September 2012 during the Olympic and Paralympics Games for the operation of a police muster briefing and deployment centre.

10 The proposed temporary structures include,

- A 3.4 metres high perimeter fence to encircle the site,
- Up to four marquees (briefing and dining facilities) kitchen complex,
- Up to 30 temporary cabins (providing office accommodation, first aid facilities, radio repairs, general storage and WC facilities),
- 54 stables,
- Parking for up to 375 vehicles and a dog van area,
- Site access via existing cross over to Centre Road and an emergency exit via Lake House Road.

Case history

11 There is no relevant case history.

Strategic planning issues and relevant policies and guidance

12 The relevant issues and corresponding policies are as follows:

- World city role *London Plan*
- Green Belt/MOL *London Plan; PPG2*
- Urban design *London Plan; PPS1*
- Biodiversity *London Plan; the Mayor's Biodiversity Strategy; PPS9; draft PPS Planning for a Natural and Healthy Environment*
- Transport *London Plan; the Mayor's Transport Strategy; PPG13;*

13 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2008 Redbridge Core Strategy, the 2008 Borough Wide Primary Policies DPD and the London Plan (Consolidated with Alterations since 2004).

14 The draft replacement London Plan, publish in October 2009 for consultation, is also a material consideration.

Principle of development

15 Redbridge Council's Local Development Framework designates the entire site as Green Belt. Planning Policy Guidance 2, London Plan Policy 3D.9 and draft replacement London Plan Policy 7.16 seek to protect London's Green Belt. Policy 3D.9 states, *"the Mayor will and boroughs should maintain the protection of London's Green Belt and proposals for alteration to green belt boundaries should be considered through the DPD process in accordance with the government guidance in PPG2. There is a general presumption against inappropriate development in the green belt, and such development should not be approved except in exceptional circumstances"*. Draft replacement London Plan Policy 7.16 does not include a reference to altering the green belt boundary through the DPD process.

16 PPG2 states that inappropriate development in the Green Belt is, by definition, harmful and the construction of new buildings in the Green Belt is inappropriate unless it is for the following purposes:

- Agriculture and forestry;
- Essential facilities for outdoor sport and outdoor recreation, for cemeteries, and for other uses of land which preserve the openness of the Green Belt and which do not conflict with the purposes of including land in it;

- Limited extension, alteration or replacement of existing dwellings;
- Limited infilling in existing villages and limited affordable housing for local community needs under development plan policies according with PPG3; or
- Limited infilling or redevelopment of major existing developed sites identified in adopted local plans, which meets the criteria in paragraph C3 or C4 of Annex C.

17 As the proposed use does not meet these criteria, the applicant is required to justify why inappropriate development should be allowed by demonstrating 'very special circumstances'. There is no definition of 'very special circumstances' and each planning application must be judged on its own merits. The applicant is seeking to demonstrate 'very special circumstances' by showing that the harm of developing on the Green Belt, is outweighed by the following considerations:

Security during the Olympic and Paralympic games

18 Draft Replacement London Plan Policy 2.4 "The 2012 Games and their legacy" reflects the strategic importance of the Olympics and Paralympic Games and their legacy for London in terms of regeneration, recreation and tourism.

19 London Plan Policy 4B.6 '*Safety, security and fire prevention and protection*' states that "*the Mayor will and the boroughs should seek to create safe, secure and appropriate accessible environments where crime and disorder, including terrorism, and fear of crime do not undermine the quality of life or community cohesion.*" The draft replacement London Plan policy 7.13 has a similar strategic aim.

20 The Olympic and Paralympic Games will attract millions of additional visitors to London in 2012. During the games the Metropolitan Police Service will be responsible for the safety and security of the events, venues and the residents and visitors to London. To ensure there are sufficient security resources, additional officers will be brought in from other forces around the country. The applicant states that there will be a unique requirement for high-level security and policing during the games and proposed muster facility (in conjunction with two similar temporary facilities in South East London and West London) is essential to provide coordinated and regular briefings to both the regular Metropolitan Police Service and the additional officers.

Lack of alternative sites

21 In support of the proposal the applicant has submitted a full needs and site selection assessment, which considers 29 Green Belt and non-Green Belt sites, and assess them against the three main requirements of the Metropolitan Police Service: size (approximately 3.5 hectares); direct access from an A- road; and a clear flat area, free from topographical or natural features.

22 Of the 29 sites only four met these three criteria. These sites were then assessed against further criteria, including the impact on local recreational use and suitable deployment of horses. This analysis demonstrated that no other site, other than the proposed Wanstead Flats site, better met the requirements for the muster briefing and deployment centre.

Temporary use and environmental benefits

23 As stated above, the proposal is for temporary use of land for a period of 90 days between June and September 2012 during the Olympic and Paralympics Games. After this time the applicant will be required to return the land to its former state and the Metropolitan Police Authority have also agreed to pay a fee in lieu of rent to the City of London Corporation based on the commercial valuation of a site of this size, location and period of time, of £170,000 to improve

facilities either in or around Wanstead Flats. The requirement to return the land to its previous state and to provide the fee in lieu of rent should be secured through conditions.

Summary

24 The proposal is inappropriate development that will harm the openness of the Green Belt, however, given the temporary nature of the facility, the commitment to restore the land to its previous state and fee in lieu of rent to improve facilities in or around Wanstead Flats, the proposal is unlikely to have a lasting detrimental impact upon the openness of the Green Belt or local residents access to open space and local community sports facilities. Furthermore, in this instance the development is required for the Metropolitan Police Service to provide high-level security and policing during the Olympic and Paralympic Games and, as such, the benefits to London from hosting the Olympic and Paralympic Games are considered to outweigh any temporary loss of Green Belt.

25 The applicant has demonstrated that the 'very special circumstances' put forward outweigh the harm caused by this temporary development to the Green Belt and the application complies with London Plan Policy 3D.9 and 4B.6 and Draft replacement London Plan Policy 2.4. The requirement to return the land to its previous state and to provide the fee in lieu of rent should be secured through conditions.

Urban design

26 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within Chapter 4B which address both general design principles and specific design issues. London Plan Policy 4B.1 sets out a series of overarching design principles for development in London.

27 This is one of many temporary Olympics facilities and as such its use is only required for the games after which all structures will be removed and the land will be returned to its existing use and made good. The proposal will be made up of various temporary structures, including up to four marquees, 30 temporary cabins and temporary stable blocks. A 3.4 metre high green perimeter fence will surround the site, blocking views into and through the site.

28 The proposal would have a negative impact on the openness and view into and out of the Green Belt for the period that it is in use. However, the scale of the proposal in the context of the wider Wanstead Flats is relatively minor and, given the temporary nature of the development, the impact will not be lasting. In this instance the temporary harm to the openness of the Green Belt is outweighed by the need for such essential security facilities for the duration of the Olympics in line with London Plan Policy 4B.6 and the proposed design would, on balance, be acceptable.

Biodiversity

29 London Plan Policy 3D.14 and draft replacement London Plan Policy 7.19 seek strong protection of Sites of Metropolitan Importance for Nature Conservation, including Sites of Special Scientific Importance. Planning for nature from the beginning of the development process and taking opportunities for positive gains for nature through the development process is encouraged on such sites.

30 The site is designated as a site of Metropolitan Importance of Nature Conservation and a Site of Special Scientific Interest is immediately north of the proposed site. As part of the pre-application discussions Natural England and the Environment Agency were consulted and neither object to the proposal due to its temporary nature and the applicant's commitment to return the

land to its 'as found' condition. Natural England, has however, requested certain conditions are attached to the permission to protect the land from long-term damage and the Council should take account of this.

31 The proposal complies with Policy 3D.14 and 7.19 subject to the conditions requested by Natural England being attached to any permission.

Transport

32 The applicant has adequately assessed the likely impact of the proposal on the local highway as well as the TfL road network. Whilst the Blake Hall Road/Overton Drive/Bush Road signalised junction is already operating near to capacity, a long-term physical mitigation measures is however not required as a result of this application due to the special and temporary nature of the proposal.

33 As part of TfL's strategy to manage traffic flows in the area during the Olympic Games, specific measures will be implemented around the nearby Green Man roundabout. It is expected that this roundabout will induce delays to general traffic approaching it, as TfL will actively manage and redirect traffic demand onto it when the A12 corridor becomes saturated. As a result, TfL advises that police vehicle movements to and from the MBDC site should allow within their schedules for any potential delay that will be incurred at this particular junction. TfL is able to provide further advice on journey time predictions, if required.

34 During pre-application discussions, it was agreed that when police vehicle flows are in excess of a certain threshold (which is still to be agreed depending on the Police schedules), a manned entry control onto the A12 eastbound on slip will need to be put in place in order to allow their exclusive access while preventing other road users. The requirement for a manned presence is therefore mainly to avoid the delay that would be caused to the police by the slowing, manoeuvring, and re-assembling of the junction traffic management, and should be secured by way of condition.

35 TfL is currently undertaking further detailed modelling for the area in relation to the Olympic Road Network. The applicant is therefore encouraged to enter into discussions with TfL to agree particular details about road closures and entry control, when the modelling is completed. This should also ideally be secured through condition by the Borough.

36 Assessment of the access to public transport stops and stations is not required in this case given the specific nature of the proposals and because most trips will be considered as multi-occupancy vehicles.

37 A construction logistics plan should be developed for the site, to comply with Policy 3C.25 of the London Plan and Policy 6.14 of the draft replacement London Plan and secured by condition to minimise the impact of vehicles on the road network and should include the following:

- booking systems
- consolidated or re-timed trips
- secure, off-street loading and drop-off facilities
- mode-shift from road to rail
- using operators committed to best practice, demonstrated by membership of TfL's Freight Operator Recognition Scheme (FORS), or similar

38 In summary, the traffic management approach set out above in relation to the A12, in instances of significant police vehicular traffic, should be secured by condition and a construction logistics plan should be prepared.

Local planning authority's position

39 Redbridge Council's position is unknown.

Legal considerations

40 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged or direct the Council under Article 6 of the Order to refuse the application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

41 There are no financial considerations at this stage.

Conclusion

42 London Plan policies on **Green Belt**, **urban design**, **biodiversity** and **transport** are relevant to this application. In general, the application complies with these policies, for the following reasons:

- **Green Belt:** The proposal is inappropriate development that will temporarily harm the openness of the Green Belt, however, in this instance the development is required for the Metropolitan Police Service to provide high-level security and policing during the Olympic and Paralympic Games. The applicant has demonstrated that the 'very special circumstances' put forward outweigh the harm caused by this temporary development to the Green Belt and the application complies with London Plan Policy 3D.9 and 4B.6 and Draft replacement London Plan Policy 2.4. The requirement to return the land to its previous state and to provide the fee in lieu of rent should be secured through conditions.
- **Urban design:** The proposal would have a negative impact on the openness and view into and out of the Green Belt for the period that it is in use. However, the scale of the proposal in the context of the wider Wanstead Flats is relatively minor and, given the temporary nature of the development, the impact will not be lasting. In this instance the temporary harm to the openness of the Green Belt is outweighed by the need for such essential security facilities for the duration of the Olympics in line with London Plan Policy 4B.6 and the proposed design would, on balance, be acceptable.
- **Biodiversity:** The proposal complies with Policy 3D.14 and 7.19 subject to the conditions requested by Natural England being attached to any permission.
- **Transport:** The proposal broadly complies with London Plan Transport Policy but the traffic management approach set out above in relation to the A12, in instances of significant police vehicular traffic, should be secured by condition and a construction logistics plan should be prepared.

43 Notwithstanding that the application complies with the London Plan, it would be improved by the following changes:

- **Green Belt:** The requirement to return the land to its previous state and to provide a fee in lieu of rent should be secured via conditions.
- **Biodiversity:** The conditions requested by Natural England should be attached to any permission.
- **Transport:** The traffic management approach set out above in relation to the A12, in instances of significant police vehicular traffic, should be secured by condition and a construction logistics plan should be prepared.

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