



Planning Committee Report

London Thames Gateway Development Corporation

Planning Application for Determination by the LTGDC

Report of the Director of Planning

UDC CASE NUMBER:	LTGDC-07-149-FUL	DATE MADE VALID:	20/07/2007
APPLICATION NUMBER:	U0006.07/LBHG	TARGET DATE:	14/02/2008

APPLICANT:	Kingsway International Christian Centre and London Development Agency (LDA)
AGENT:	Rapleys LLP
PROPOSAL:	<p>Full Planning Application for a phased mixed-use development for uses and works comprising of:</p> <ul style="list-style-type: none"> ▪ the construction of a temporary multi-use auditorium / youth hall / indoor sports and meeting facilities (within use classes D1 and D2) extending to 5,000m² gross; ▪ temporary ancillary uses comprising Use Classes A1 (retail shop) and A3 (food and drink), ground level car parking for between 395-445 vehicles (depending on the phase of construction), access roads, servicing facilities, toilets, plant and landscaping; ▪ the temporary siting of 64 toilet cubicles and 40 wash hand basins in pre-fabricated units; ▪ the siting of a temporary M & E Compound containing a bio-mass generator and storage for pellets, a diesel generator, an electrical switch room, air handling units and sewage storage; ▪ the construction of a permanent 8,000 seat multi-use auditorium (13,570m² gross) (within use classes D1 and D2 and sui generis theatre uses including support facilities, media production and 150m² gross for recording studios within use class B1; ▪ the construction of a four storey permanent administrative office building (use class B1) (3,042 m² gross) to include counselling

	<p>rooms (2,184 m² gross) and a 686 m² gross refectory on the ground floor;</p> <ul style="list-style-type: none"> ▪ the construction of a permanent 306m² gross, two storey, 500 seat chapel; ▪ the construction of a permanent 1000 seat multi-use building, comprising facilities for children and youth, with two main spaces providing flexible space for training/education facilities, a library, a gymnasium/dance studio and a crèche; ▪ the construction of a permanent 1,200 space seven storey car park, to include accommodation for 20 motorcycles and 89 bicycles; ▪ permanent provision of 4 surface car parking spaces; surface mini-bus parking bays, bus and taxi pickup / drop-off points and servicing areas; ▪ permanent provision of an external play area / multi-use games area; ▪ the construction of new, permanent, three arm roundabout and access roads; and a ▪ hard and soft landscaping.
LOCATION:	Plots 10-12 off Consul Avenue and Manor Way, Beam Reach 5 Rainham, Essex.

1. SUMMARY

- 1.1 This report considers an application for full planning permission by Kingsway International Christian Centre (KICC) and the London Development Agency (LDA) for the phased development of an LDA owned site within Beam Reach Business Park, Rainham as listed in the 'PROPOSAL' section above.
- 1.2 Officers have considered the planning application with regard to the requirements of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 and the provisions of the development plan (The London Plan and the London Borough of Havering Unitary Development Plan), so far as material to the application, and to other material considerations and recommend that the application be **refused**.
- 1.3 This application is of 'potential strategic importance' as described in Part III, Category 3E (a)(x) and 3F of the Town and Country Planning (Mayor of London) Order 2000. Therefore notification to the Mayor of London was required. If The Corporation resolves to grant planning permission, it must first allow the Mayor an opportunity to decide whether to direct it to refuse planning permission.
- 1.4 The proposal does not accord with the provisions of the development plan in force in the area and has been advertised as a 'departure application' under the Town and Country Planning (Development Plans and Consultation) (Departures) Directions 1999.

- 1.5 This application was submitted on the 18th July 2007. The local planning authority (LTGDC) should determine the application within 16 weeks from that date. That period has been extended by written agreement between LTGDC and the Agent to the 14th February 2008. Should members resolve to grant planning permission, the details of the application must be referred to the Secretary of State and the Mayor of London. The application may, therefore be determined after the 14th February 2008, requiring a further extension of the determination period by mutual agreement. If the application is not determined within the agreed extension period, the applicant may appeal to the Secretary of State against non-determination.

2. CONTEXT

- 2.1 KICC vacated their previous permanent location at 50-57 Waterden Road, Hackney in September 2007, to release the land for the development of the Olympic Park.
- 2.2 The London Borough of Havering Regulatory Services Committee considered this application on the 15th January 2008, and indorsed an officer recommendation to raise objections to the application.
- 2.3 The application is accompanied by an Environmental Statement as the proposal falls under Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999, specifically category 10, section (b).
- 2.4 As stated in section 1.3 above, the application is referable to the Mayor of London. The Mayor of London has declared a conflict of interest with the 2012 Olympic and Paralympic Games under the GLA's Planning Code of Conduct. The application has therefore been referred to the Chief Executive of the Greater London Authority, who will undertake the Mayor's role in assessing this application.

3. SITE DESCRIPTION

- 3.1 The application site is within the London Riverside Area. It lies to the north of the A13; south of the A1306 and CTRL land / Network Rail lines (London – Tilbury – Southend railway line); east of Marsh Way; and west of Manor Way and the Riverside Sewage Works, in Rainham, Essex. A site location plan is provided at Appendix 1.
- 3.2 The site lies within an area that has been upgraded and identified for future development as Beam Reach 5 Business Park, for which outline planning permission was granted in 2002. Some of the infrastructure work has already been undertaken to establish the site layout approved under the original outline consent. This includes the provision of an access road off of Marsh Way that links to Consul Avenue within the site, which formed part of the original Ford Works access linked to Manor Way.
- 3.3 Beam Reach 5 Business Park is located within the South Hornchurch Ward of the London Borough of Havering. It is a 30.9 hectare site which was formerly part of the Ford Motor Company Estate. It is presently owned by the LDA and has been divided into 13 development plots over two land parcels known as 'The Foundry

Site' (7.1 hectares) and 'Mudlands' (23.8 hectares). Those two land parcels are separated by Marsh Way Flyover, with The Foundry Site to the immediate west and Mudlands to the immediate east. Mudlands includes a site of importance for nature conservation (SINC), which covers 5.9 hectares. This application seeks consent to develop plot numbers 10, 11 and 12, covering an area of 4.05 hectares which are located in the south-easternmost corner of Mudlands.

- 3.4 The 'red line' illustrating the site area covers 5.518 hectares because it includes the proposed new access roads and a roundabout.
- 3.5 The eastern boundary of the application site is delineated by a line of trees adjacent to Manor Way. The site is vacant and is mainly level with some minor ditches and mounds and has in part previously been spread with material to raise the level. Vegetation is sparse consisting mainly of scattered scrub and coarse grass.
- 3.6 Sub-surface, a major feed rising main foul sewer passes through the northern part of the site. Thames Water will not allow structures to be erected within a 3m restriction zone either side of it. However, hard and soft landscaping within that zone is acceptable.
- 3.7 Overhead electricity lines, supported by pylons, run parallel with the northern side of the A13, directly adjacent to the southern boundary of the development site.
- 3.8 If approved, the plots would be developed and occupied by KICC under the provisions of a 250 year lease from the LDA.
- 3.9 Access to Beam Reach 5 Business Park is via a private access road with no connections to adjoining residential communities and areas.

4. DESCRIPTION OF PROPOSAL

- 4.1 The description of the proposal states that this application is for a phased 'mixed-use' development. LTGDC officers have considered the proposal against the provisions of The Town and Country Planning (Use Classes) Order 1987 as amended in 2005 and find that the proposal falls within Use Class D1 (h) non-residential institutions for, or in connection with, public worship or religious instruction, with ancillary uses.
- 4.2 The application seeks full planning permission to provide temporary structures and five main permanent buildings in addition to a series of supporting and technical annexes. The proposed site layout plan and elevations are shown at Appendices 2 and 3. The main permanent buildings are to comprise of the following:

	Footprint		
8,000 seat Auditorium including annexes	8,843 m ²	4 levels (approx. overall height 33 m)	Total 17,3189 m ²
Office building	1,289 m ²	4 levels (overall height 16m)	Total 5,894 m ²

1000 seat Multi-use building	1,070 m ²	3 levels	Total 2,760 m ²
Multi-storey car park	5,189 m ²	7 levels (overall height 20.5 m)	Total 36,449 m ²
500 seat Chapel	306 m ²	1 level (roof level +14.8m)	Total 306 m ²

4.3 The temporary structures are proposed to comprise of the following:

- 5,000 seat Auditorium with a footprint of 5,100 m² (100 x 51m) and overall height of 17.2m;
- Office with a footprint of 710.04 m² (58.2 x 12.2m), 3 levels, with an overall height of 8.5m;
- Phase 2 - 395 space car park (incl. 20 spaces for disabled badge holders)
- Lavatories:
 - 64 wc cubicles and 40 wash hand basins for female; and
 - 24 wc cubicles, 30 urinals and 40 wash hand basins for male.
- Supporting plant areas (M & E compound - bio-mass generator and storage for pellets; a diesel generator; an electrical switch room; air handling units and sewage storage) with a footprint of 300m² (20 x 15m); and
- Phase 3 – 445 space car park (incl. 20 spaces for disabled badge holders).

4.4 Explanation of proposed phasing – The development is proposed to be carried out over a period of approximately five years, or by 2012.

4.5 Temporary development is to provide accommodation in the short term, whilst permanent facilities are constructed. The temporary buildings are proposed to be utilised on an interim basis, until the permanent building fulfilling that purpose is constructed. At such time as the permanent works are completed, the corresponding temporary facility should be removed.

4.6 Phase one ~ Enabling Works to part of the site

- Duration of 4 weeks.
- Part of the site is to be prepared for development by laying a permeable hard surface.

4.6 Phase two

- Duration of 8 weeks.
- Temporary auditorium is to be constructed on site – 5000m² building with room to host 5000 people. This structure would be 17.2m high, with an aluminium frame with pvc-coated polyester cladding. The lower section of the structure has a secondary cladding of colour-coated profiled steel. 300mm thick insulated lining will provide thermal and noise insulation.
- Temporary offices – Three storey building with a floor area of 810 m². The offices will be brought to site pre-fabricated in sections and erected onsite. They will have plasticol coated steel cladding and double-glazed pvc windows. Electrical power to the offices will be provided by a diesel generator within a plant compound. A small kitchen and WCs are proposed: hot water will be provided by a bio-mass generator located within a plant compound.

4.7 Phase three

- Duration of 104 weeks.
- Auditorium – main building of the site with an area of 9,506 m² and room for 8000

seats.

- Support building – building connected to the main auditorium, containing changing rooms.
- Services plant – six plants of 158 m² each where the gas boilers are to be located.
- Temporary car park – outdoor car park with 445 spaces and an additional 20 spaces for disabled users.

4.8 Phase four

- Duration of 40 weeks.
- Temporary auditorium removed;
- Multi storey car park – ground floor plus four floors of 6,701 m² each with 250 spaces per floor. This car park will be located on the site previously occupied by the temporary auditorium.

4.9 Phase five

- Duration of 66 weeks.
- Multipurpose building – three storey building of 1,034 m² that will host the children's church and the Youth Church. This building will occupy part of the former temporary car park space.

4.10 Phase six

- Duration of 52 weeks.
- Office building – four storey building of 1,195 m² with a catering area on the ground floor.
- Chapel – single storey building of 211 m².

4.11 Total construction period = 274 weeks (5 years and 14 weeks)

4.12 The application is accompanied by a number of supporting documents including an Environmental Statement (and Non Technical Summary), Transport Assessment, Community Consultation Statement, and a Planning Statement.

4.13 The future potential expansion of the proposed buildings, or the erection of additional buildings does not form part of this application.

4.14 The proposal includes the creation of a new three arm roundabout and access roads east, linking to the development plot; and south, towards the existing Marsh Way roundabout.

4.15 The proposal involves the felling of 72 existing trees/shrubs.

4.16 Water services will be taken from the site mains supply located along the eastern boundary.

5. KINGSWAY INTERNATIONAL CHRISIAN CENTRE (KICC)

5.1 KICC is a large and growing international church; registered company; and a registered charity. It was established by the Reverend Matthew Ashimolowo in 1992, where it occupied Holloway Boys School with a congregation of 300. Since then it has occupied various sites. Most recently its main services were held in a

4,000 seat auditorium at 57 Waterden Road in Hackney; a 9.5 acre site, purchased outright by KICC 1997.

- 5.2 Currently, KICC occupy 468-474 Hoe Street, Walthamstow, London E17 9AH, where six services are held on Sundays, supplemented by classes on Wednesday evenings for those who wish to be baptised or become members or workers within the church.
- 5.3 KICC focus upon teaching, pastoral care and evangelism through a range of different ministries the purpose of which is stated to be to, “spread the Gospel of Jesus Christ”. The Church presently has a total membership of around 12,000 of which 8,000 regularly attend its existing services in Walthamstow.
- 5.4 KICC emphasises the importance of collective worship based upon the congregation’s desire to hear their founder preach. The church has branches in Wimbledon, Luton, Wembley, Hackney (services held in French) and Birmingham. There are also numerous chapels elsewhere that are used by much smaller numbers. KICC also has affiliated branches in Africa, with four in Nigeria and one in Ghana.
- 5.5 Services are broadcast on ‘the GOD channel’, which is available worldwide on both satellite and cable television.
- 5.6 Planning permission to use 50 to 57 Waterden Road was granted only for a temporary period expiring in April 2000. In 2003 the London Borough of Hackney issued an enforcement notice further to a breach of planning control being the unlawful retention and use of that site. The enforcement notice required:
 1. The cessation of the premises for religious activities (including associated car parking); and
 2. The complete removal of all temporary buildings associated with the use of the premises for religious activities.
- 5.7 The period of compliance with the requirements was 12 months.
- 5.8 Appeals were subsequently lodged by trustees of The King’s Ministries Trust, Kingsway International Christian Centre and KICC Bookstore Ltd against the enforcement notice. The appeals were dismissed in November 2004 and the enforcement notice upheld with corrections and a variation. The corrections substituted “religious” for “Use Class D1” and extended the compliance period to within two years of the date of the notice taking effect.
- 5.9 KICC continued to occupy its site at Waterden Road unlawfully until Summer 2007, when it was required to vacate the site, which is located within the London 2012 Olympic Park to make way for development associated with the Olympic and Paralympic Games. The foregoing history explains why KICC is seeking new premises.

6. LONDON DEVELOPMENT AGENCY (LDA)

- 6.1 The LDA, one of nine Regional Development Agencies, is a functional body of the GLA.
- 6.2 The LDA own Beam Reach Business Park 5, in which the application site lies. The site will be developed and occupied by KICC under the provisions of a 250 year lease. The LDA will retain freehold ownership of the land in the context of its wider land holding interests and responsibilities for the overall estate management of the Business Park.
- 6.3 If planning permission is granted and the proposal goes ahead, it is understood the LDA would sell the application site to KICC. A separate site management agreement between the LDA and KICC will be entered into.
- 6.4 LDA officers have worked with KICC to identify alternative development sites. The process that led to the LDA and KICC selecting the subject application site from the LDA's portfolio has been reasonably demonstrated. Officers are satisfied that proper consideration was given to other LDA landholdings and that KICC also carried out its own property search.
- 6.5 The GLA stage 1 report states that LDA officers advise that the site was marketed for several years for high technology manufacturing to complement and build on activities based at the nearby Centre for Engineering and Manufacturing Excellence (CEME). The marketing did not secure the redevelopment of the application site. The LDA also advises that when London was awarded the 2012 Olympic and Paralympic Games in 2005, it identified its Beam Reach landholdings as potential sites for businesses relocated from the Olympic site, but that despite initial interest from a number of companies, only one business, Newsfax International (a high technology printing company) has located to the Business Park to date.

7. MAIN ISSUES

- Environmental Issues
- Principle of proposed land use(s)
- Urban Design
- Sustainability
- Sustainable drainage and flood risk management
- Employment
- Transport
- Sequential Test and Site Search

8. RELEVANT SITE HISTORY

- 8.1 Application Number LTGDC-07-178-AOD – Current assessment ongoing at time of writing this report – Application seeking approval of details pursuant to condition 4 attached to planning application number LTGDC-07-023-FUL dated 25th April 2007. Environment Agency (EA) has advised that it is not in a position to recommend approval until the EA have reviewed the final remediation validation report.

- 8.2 Application Number LTGDC-07-180-AOD – Details approved on 11th December 2007, pursuant to conditions 8, 10 and 11 attached to planning application number LTGDC-07-023-FUL dated 25th April 2007.
- 8.3 Application Number LTGDC-07-023-FUL – Full planning permission for site enabling works comprising the levelling and laying of an area of hardstanding including appropriate boundary fences. Granted 25th April 2007.
- 8.4 Application Number P1869.05 – Application under s.73 of the 1990 Act, seeking renewal of previously approved outline permission for development of approx. 101,000m² of industrial and office use (B1, B2 and including warehousing ancillary to industrial processes).
- 8.5 Application Number P1970.05 – Reserved matter application for plot 9 granted December 23rd 2005, B1 & B2 use with ancillary storage/distribution (office, warehouse, service yard and car parking).
- 8.6 Application Number P1155.00 - Outline Planning Permission granted 7th November 2002, subject to 29 conditions and a s106 agreement for the development of approximately 101,000m² of industrial and office use (B1, B2 and including warehousing ancillary to industrial processes).
- 8.7 Application Number P1605.00 – Planning Permission granted 8th February 2001, subject to conditions, for the construction of a highway from the A13/Marsh Way roundabout to Consul Avenue.

9. RESPONSES FROM STATUTORY CONSULTEES

- 9.1 **Mayor of London:** The Greater London Authority Chief Executive considered a stage 1 report on the 2nd November 2007 (planning report reference number PDU/1630/01 - planning application no. PA/06/01525).
- 9.2 The Chief Executive concluded that the London Plan fully supports the provision of new community facilities and social infrastructure to help ensure that the spatial needs of London's diverse population can be properly met through planning, thereby helping counter discrimination and disadvantage. The proposal could help meet these needs and could also provide a range of employment opportunities in an area of relatively high unemployment.
- 9.3 However, the proposal as currently submitted raises a number of strategic planning issues. Notably, it lies in a Strategic Industrial Location (SIL) identified by the London Plan and the emerging Havering Local Development Framework (Core Strategy). It also has poor public transport accessibility.
- 9.4 In the light of these issues, before the case is referred back to the Mayor for determination (in the event that the LTGDC Members resolve to grant permission), the applicants, the LDA, the GLA, TfL and the LTGDC should resolve issues relating to: site availability and whether any alternative and suitable site opportunities realistically exist that would meet KICC's requirements; implications of the potential release of the application site from its SIL designation; ensuring that

the proposal could provide adequate and deliverable public and private transport arrangements for users of the facilities, and that the proposed car parking arrangements be agreed with TfL officers; and the providing of clarity and certainty on the other technical and policy matters set out in the report.

- 9.5 GLA Officers have advised that a revised stage 1 report is currently being prepared. That report was not available at the time this report was completed. LTGDC officers will ensure that any correspondence received is made available to Committee Members as part of an addendum to this report.
- 9.6 **London Borough of Havering:** The London Borough of Havering Development Control Service has participated fully from the pre-application stage in the assessment of the subject planning application. An officer report was considered by the London Borough of Havering Regulatory Services Committee on the 15th January 2008 with the following recommendation:
- 1) That the Committee agree that objections be raised to the application in principle on the basis that the development does not comply with government guidance and London Plan and Havering UDP and LDF policies as set out in Havering's Officer Report which expresses concern in relation to conflict with strategic employment policy, transport related implications and conflict with policies relating to the location of community facilities;
 - 2) In the event that the London Thames Gateway Development Corporation are minded to recommend approval of the application, notwithstanding the objections of the Council, that conditions be imposed and section 106 contributions be required as set out in the conclusions of Havering's Officer Report; and
 - 3) That the Head of Development and Building Control be authorised to prepare a written response to the London Thames Gateway Development Corporation in accordance with the recommendation or as otherwise resolved by the Committee at the meeting.

Havering Members resolved to raise in principle objections to the application on the basis that the development does not comply with government guidance and London Plan and Havering UDP and LDF policies as set out in the report and expressed concern particularly in relation to conflict with strategic employment policy, transport related implications and conflict with policies relating to the location of community facilities.

- 9.7 **London Fire & Emergency Planning Authority (LFEPA)** – (Letter dated 31st August 2007) Recommendation with regard to the installation of 4 Private Fire Hydrants at specified positions.
- 9.8 (Letter dated 2nd October 2007) Insufficient details were provided to assess if access is in compliance with Approved Document B of the Building Regulations 2000.
- 9.9 **English Heritage Greater London Archaeological Advisory Service (GLAAS):**
(Letter not dated – received by LB Havering 7th August 2007) Representation received in relation to historic building and historic area matters only - Do not wish

to offer any comments on the application.

(Letter dated 17th January 2007 to CgMs Consultancy regarding Archaeological Desk Based Assessment) Report clearly shows that the potential for archaeological remains, and particularly palaeo-environmental evidence, has already been addressed during previous archaeological investigations on the site. This field work has been followed up with a programme of post-excavation analysis of the environmental samples recovered from the site, the results of which are to be disseminated, partially by publication in an academic journal.

This work has mitigated the impact of development on the site. English Heritage will not be recommending a requirement for further archaeological investigations as part of any new proposals for the redevelopment of the site.

- 9.10 **Environment Agency:** (Letter dated 16th August 2007) Commend the improvements that are proposed on the site in the form of an ecological boundary and swale, porous paving and brown roofs and green walls. These elements not only work as techniques to reduce surface water run off and improve water quality but also create additional habitat for wildlife.

Environment Agency has confirmed that it is satisfied with the application in terms of flood risk providing the conditions requested are imposed on any planning permission granted.

Confirmation received that the Sequential and Exception Test meets the requirements of PPS25.

- 9.11 **Friends of the Earth Havering Local Group; CPRE NE London Group:** (Letter dated 16th September 2007) Welcome the commitment to the CABE 'excellent' construction standard, but feel it necessary to object for the following reasons:

1. The application does not satisfy adopted Havering UDP Employment and Strategic Policies that are continued in adopted and/or draft LDF policies EMP1, EMP5, STR1, STR5, STR17, STR27, STR28, STR28, STR29 and STR30;
2. The proposed use of the Riverside location is not River-related;
3. Development of the land adjoining the existing rail corridor may compromise future extension of the Docklands Light Railway to Rainham;
4. The proposed use is not regenerative in the accepted sense, nor as envisaged in LTL/LTGDC documentation. Beam Reach site No 5 has been remediated and scheduled for major business and employment use – which this Application clearly would not deliver. There is no employment creation i.e. jobs open to all, as normally understood and consulted upon in the London Thames Gateway Riverside Zone of Change Regeneration Vision applicable to this site. All 75 permanent staff are to transfer from Hackney and eligibility for most, if not all, other posts would clearly be confined to members of the Applicant organisation. The suggested local employment benefits are unsubstantiated and should be discounted;
5. The proposed 'community benefits' from the use of the Applicant's facilities are, in reality, fragmentary, entirely discretionary and could be curtailed or withdrawn at any time. These suggested benefits should also be disregarded.

- In any case, although there is certainly a need for a large auditorium for concerts etc. within Havering, in the interests of Sustainability, it should be more centrally located and well-served by Public Transport;
6. The promised £9.4m benefits to local business appear largely illusory, given the likelihood that existing contract and suppliers would be continued. Unless substantiated, the claim should be largely discounted;
 7. The initial five-year period of major construction, with more major construction already planned by the Applicant after a further five years, is another major community disbenefit. The Application offers insufficient remediation. Compensatory conditions are required;
 8. The environmental impacts on drinking and general water use will be higher than for the LTGDC planned business uses. Also, drainage for 10,000 people, plus future planned growth to 14,000 by 2026, appears likely to overload Rainham Sewage Treatment Works and/or increase the perennial recurring problem of offensive odours. Compensation for remedial measures may be required and should be investigated;
 9. The applicant will be unable to prevent extensive offsite parking by its members travelling by car as asserted in the Application. The quality of life of many local residents would be affected. Compensation for remedial measures should be a condition of approval;
 10. Existing public transport to the site is very limited and most visitors would find it inconvenient to use contrary to what is suggested in the Application. There is no direct scheduled Rail or Bus connection between the Hackney area and Rainham.
 11. In view of Cycling hazards experienced along the substandard A1306 Cycle infrastructure, a condition is required to ensure that proposed extension to the site is designed to safer continental standards as recommended by London/UK Cycling Organisations. The matter should be raised with the Council's Cycle Liaison Group;
 12. The soundness of Consultant Reports is called into question in view of the identification of the Site as 'in Dagenham' [Safe Consulting Ltd] and 'to the north of the A13' [Landscape Statement];
 13. The claimed high level of public support does not stand up to scrutiny. The relatively few responses to the Applicant's questionnaire are almost all from members of the Applicant Organisation with very few from either member or non-member local Residents.
 14. There are good grounds for refusing the Application but, if approved, a comprehensive S106 agreement with conditions that will remediate all such local disbenefits is essential;
 15. The application results from the poorly-structured 2012 Olympic Games bid, which offers no detectable benefits to the Borough of Havering, but engenders several disadvantages for its residents. The application introduces new journeys which would have implications for air quality, noise levels, road safety, and would contribute to climate change.

9.12 **Highways Agency:** (email 5th November 2007) Based on the assumption that the parking will be strictly limited to 1200 spaces, and there is no other off site parking that could be used; and the imposition of appropriate planning conditions to minimise car travel and congestion, the Agency do not wish to comment further, as the impact on the A13T would not be material.

- 9.13 **London Development Agency (LDA):** (email 31st July 2007) Confirmed that the LDA is joint applicant and this reflects the full support of the Agency to this proposal.
- 9.14 **Metropolitan Police:** (Letter dated 17th August 2007)
1. The Design and Access statement is lacking in the requisite level of detail that would demonstrate how crime prevention measures have been considered in the design of the proposal and how the design reflects the attributes of safe, sustainable places set out in 'Safer Places – the Planning System and Crime Prevention', as detailed in 'Paragraph 8 of DCLG Planning Circular 1/06'.
 2. Suggested a number of conditions and informatives to be used if the local planning authority are to consider granting planning permission.
 3. Suggested that a sum of £220,000 should be sought towards the future costs of providing additional police facilities that will be necessitated as a result of the cumulative impact of developments within the London Thames Gateway region.
- 9.15 **National Grid:** (Letter dated 13th August 2007 and 20th August 2007) In respect of National Grids operational electricity transmission network and its operational national gas transmission network the details provided were found to present a MODERATE risk. However National Grid has provided the agent (Rapleys) with network plan(s) and general guidance that should enable successful management of that risk.
- 9.16 **Natural England:** (Letter dated 9th August 2007)
- Issues surrounding protected species are being handled effectively.
 - Supportive of the proposals for biodiversity enhancements both on and off-site and the opportunities they provide for linking up Mudlands and Riverside Sewage Treatment Works SINC's.
 - Would like to see enhancements secured as part of a s106 or similar legal agreement that includes long-term management and monitoring proposals.
 - Happy to comment and advise on further details of landscaping and biodiversity enhancement as they evolve.
- 9.17 **RSPB:** (Letter dated 24th July 2007) No objection and no further comment to make given that the location of the development is unlikely to have an impact on the Inner Thames Marshes Site of Special Scientific Interest.
- 9.18 **Thames Water Utilities Ltd:** (emailed letter dated 16th August 2007)
- Waste Comments - Thames Water has identified an inability of the existing waste water infrastructure to accommodate needs of this application. Suggested 'Grampian Style' condition to be imposed, should the Local Planning Authority approve the application;
 - Surface water drainage comments – It is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of Ground Water. Where the development proposes to discharge to a public sewer, prior approval from

- Thames Water Developer Services will be required;
- There are public sewers crossing this site, and no building works will be permitted within 3 metres of the sewers without Thames Water's approval. Should a building over / diversion application form, or other information relating to Thames Waters assets be required, the applicant should be advised to contact Thames Water Developer Services;
 - Where the proposal includes a swimming pool Thames Water requests that specified conditions are adhered to with regard to the emptying of swimming pools into a public sewer to prevent the risk of flooding or surcharging;
 - Recommendation regarding the installation of a properly maintained fat trap on all catering establishments;
 - Water supply is within the area of Essex and Suffolk Water Company; and
 - Would like to know what provisions the developer is making to ensure that any odour, which may be generated from the neighbouring Sewage Treatment Works normal operations, will not result in environmental health odour concerns.

(emailed letter dated 25th September 2007) Comments regarding waste and surface water drainage. No objection with regard to sewerage infrastructure.

9.19 **Union Railways (North) Limited:** (Letter dated 16th August 2007) The site is partly within the limits of land safeguarded under the Channel Tunnel Rail Link Directions which came into force on the 9th February 1996. The application site is south of and not contiguous with the Channel Tunnel Rail Link (CTRL) as constructed.

For the purposes of consultation under the CTRL Directions URN would offer no objection in principle.

9.20 **Transport for London:** (email dated 30th January 2008) All comments represent the views of Transport for London and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this scheme. These comments do not necessarily represent the views of the GLA.

9.21 Travel Demand Assessment/ Streets The proposed signalised junction improvement at the A13/ Marsh Way junction will ensure no detrimental impact on the A13. Phasing of the development in line with the improvements is therefore important to prevent negative impacts and the planning approval will need to include a condition that restricts temporary and permanent occupation of the site until the signal scheme has been completed; construction and certain ancillary land uses could commence earlier, but not the main services. It is understood that the transport consultants have been liaising with the TfL Directorate of Traffic Operations (DTO) and confirmation will be needed that any signalling changes are acceptable to DTO.

9.22 As outlined below, TfL has expressed concerns about the recently introduced proposal regarding the provision of overspill parking. It is assumed that limited parking provision on-site should cap vehicular traffic generation, as reflected in the original Transport Assessment (TA), and this should not be undermined by off-site parking provision.

- 9.23 Buses There are concerns about a high trip-generating proposal being located in an area with low public transport accessibility and a situation must be avoided where the legacy of this proposal is sustained pressure for London Buses to supply additional bus services which are highly unlikely to be cost effective.
- 9.24 In recent correspondence with the transport consultants, clarification was provided of the economics of bus services within London, which are planned to maximise passenger benefit rather than profitability. There are concerns that the proposed development will create long term pressure to increase bus provision to the site, both in terms of increased frequencies and new routeings to the site beyond sending the 174 bus to the nearby Centre for Engineering and Manufacturing Excellence (CEME) on a Sunday. Due to the nature of the development and its location, it is considered unlikely that service changes beyond the 174 extension would meet London Buses' usual cost benefit criteria and so would incur an unacceptable cost.
- 9.25 It is noted that the applicant has agreed to fund the additional cost of sending route 174 to CEME on a Sunday for a period of three years, at a total cost of £150,000. This must be included within any s106 agreement.
- 9.26 Further work is needed to ensure that the shuttle bus service can be operated as per the TA. A bus stand will be needed for the shuttle bus services, and a traffic order permitting buses to stand on Abbey Road should be provided to ensure that the shuttle buses do not interfere with local bus operations. Similarly, traffic orders designating bus stops and bus lanes within Barking town centre should be amended to apply to London Buses contracted services only, to prevent interference with London bus operations. Discussions with the London borough of Barking and Dagenham should seek to resolve these matters.
- 9.27 There is also concern that the shuttle buses will only operate on Sundays and not on weekdays when there are services. Any Section 106 agreement should include a provision that shuttle bus services will be provided on weekdays if required, and this will have implications regarding the Abbey Road and CEME bus stands. It is understood that at present car parking is permitted on Abbey Road from Monday to Saturday but not on Sunday. As above, bus stands should be provided for all days of the week.
- 9.28 Concerns must be addressed regarding the proposed use of CEME as a stand for the shuttle buses and potential effects on the operation of the 174 bus. Agreed access arrangements with CEME must be provided, including mechanisms for opening of the security barrier.
- 9.29 The applicant's commitment to provide sufficient buses to meet demand for the shuttle bus service from Barking, however many that needs to be, is welcomed and this should be a condition of planning permission. The location of layover area for the contracted bus company should be agreed with TfL and local Councils.
- 9.30 The plans to implement northbound and southbound bus lanes on Marsh Way as part of the section 278 signal scheme at the Marsh Way/ A13 junction are supported. Further assessment of the bus stops on Marsh Way has indicated that

the bus stop clearways are in poor condition but the stops generally meet accessibility standards. Therefore, a financial contribution of £5,000 towards the resurfacing the bus clearways is sought, as opposed to the originally anticipated contribution of up to £40,000.

- 9.31 East London Transit (ELT) There are no current objections to the use of Abbey Road as a standing space for the proposed shuttle service as it has not been identified for standing for ELT services.
- 9.32 Car Parking The parking permit proposal is welcomed but it remains unclear how area car parking will be controlled if KICC attendees arrive at the on-site car park without a permit or with less than 3 occupants per vehicle. The updated Interim Travel Plan discusses discouragement of area car parking, but the consequences of ongoing parking on area streets need to be made clear.
- 9.33 Concerns remain about the use of CEME or other local sites for 'temporary' car parking and the risk of undermining on-site parking restrictions and the sustainable travel principles in the Interim Travel Plan. Although it is understood that there may be operational issues with the initial introduction of limited parking on the Beam Reach site, it must be ensured that any overspill parking is used appropriately and temporarily. Clarification is needed whether the 'one month' period of overspill parking applies as a phased measure, i.e., overspill parking would be provided for one month after the temporary limited-capacity venue is opened and then reopened for one month upon opening of the permanent, full-capacity venue.
- 9.34 Confirmation that the proposed permit system would be used to restrict non-KICC use of the KICC car park is welcomed; however it should be made clear how the permit system will be enforced during all hours. As suggested in the January 2008 Interim Travel Plan, TfL would welcome the implementation and enforcement of additional parking restrictions in the vicinity of the site; details of such measures should be provided.
- 9.35 Although monitoring of residential areas is mentioned, further information is needed about a parking enforcement strategy for managing any problems identified by the monitoring activities. The consequences of ongoing parking problems identified must be provided and include measures such as the reduction in event capacity and number of events if ongoing problems are not solved.
- 9.36 Cycle Parking It is understood that upon opening of the temporary facility, 84 cycle parking spaces are to be provided. TfL has required that, as part of the Travel Plan, the use of these spaces should be monitored and a commitment made to increase spaces when needed (if 80% of spaces are in use). The updated Travel Plan's clause that if 80% of the spaces are in use, the number of cycle parking spaces will be increased 'if agreed with the Travel Forum as being necessary' should be removed. Space to accommodate additional future cycle parking should be identified.
- 9.37 Details of the provision of employee shower/ locker facilities are required.
- 9.38 Pedestrian and Cycling Access TfL's Cycling, Walking and Accessibility team (CWA) is satisfied with the information provided on the location of and access to the

cycle parking (within the car park via a separate designated cycle path). Responsibility for pedestrian and cycle improvements to/ from the site apparently lies with the London Development Agency (LDA) and clarification from the LDA is welcomed that the link to the north of the site via Manor Way is to be reopened as part of the area Masterplan, increasing the permeability of the site for pedestrians. Although no schemes are committed as part of the LDA Masterplan and wider area aspirations, including new transport infrastructure and housing proposals, the layout for this site should consider future pedestrian/ cycle connections to these sites.

- 9.39 Travel Planning It is reiterated that the proposed development is heavily dependent on travel planning and this aspect warrants significant attention. The updated Interim Travel Plan is welcomed and comments on its elements are provided throughout this response. TfL welcomes confirmation that Wednesday evening events will commence after 7PM and that no external events will be held at the temporary venue.
- 9.40 More information is required about the number of events with less than and more than 2500 attendees. It is not sufficient to indicate that events with more than 2500 attendees will be 'infrequent'. Timing restrictions for these events, such as a 7pm or later weekday start time, need to be provided and should be controlled by a planning condition.
- 9.41 An Event Management Plan will also be required for the non-KICC events that are expected to occur. Consequences should be included for an organisation that hires the proposed facilities and does not comply with the agreed travel arrangements. In the case of ongoing travel problems with such events, they should be temporarily discontinued.
- 9.42 Mode share targets for travel to/ from the site should not be limited to Sunday worship, but to all events at KICC.
- 9.43 **London Borough of Barking & Dagenham (LBBD)**: (Letter dated 10th September 2007) A report considering the implications of the application on LBBD was presented to a meeting of the Development Control Board on the 28th August 2007. LBBD considers that the proposal presents issues that would significantly impact adversely upon residents on the affected roads especially during early morning hours.
- 9.44 LBBD (email correspondence 23rd January 2008 & 1st February 2008)
- There could be major implications for bus/people management due to sheer volume;
 - Unclear about layover arrangements;
 - The route through the Gascoigne Estate is unacceptable;
 - The facility to park buses in the longer term cannot be guaranteed for the purpose of the current planning application;
 - A Traffic Order to formally allow bus parking is unlikely to be considered favourably.

10. APPLICATION PUBLICITY

Site Notice Expiry: 22nd August 2007

Press Notice Expiry: 24th August 2007

Neighbour Notification: 23rd August 2007

11. REPRESENTATIONS RECEIVED FROM MEMBERS OF THE PUBLIC

11.1 The following representations have been received:

- 4102 individual letters of support, including one letter from an MP;
- 462 letters of support using pro forma text;
- 4578 individual letters of objection, including one letter from an MP. Approximately 4340 of that total use pro forma text;
- 6904 signature petition in support;
- 59 objections submitted via the LB Havering website;
- 13 objections submitted by email;
- 4694 signature petition in support; and
- 80 signature petition of objection.

11.2 The approximate total number of representations received at the time of writing this report stood at: 16,162 in support; and 4,730 who object.

11.3 The representations have not all been cross referenced to omit duplicate submissions. Members are also advised that several submissions, both in support and objection to the proposal, are from members of the same household.

11.4 Individual offensive / inappropriate / non-planning related comments have not been considered as part of the assessment of this application. Similarly, personal religious testimonies have been discounted.

11.5

Summary of individual comments received in support of the application	Response to comment
▪ Concerned that many false and untrue stories have been circulated by local pressure groups to turn the local population against the application.	Opinion noted.
▪ The church will provide a 'dial-a-ride' service for members of the community with restricted mobility.	The proposed mini-bus service is discussed at section 13.21 of this report.
▪ The church will benefit the community by providing local employment.	Employment is discussed at section 13.20 of this report.
▪ The church will provide a £50k fund accessible to local community organisations.	As stated in section 14 of this report, financial offers are being considered as part of ongoing section 106 discussions in line with Department

	<p>of the Environment Circular 1/97 which encourages fair, open and reasonable negotiations and requires that obligations meet a number of policy tests. The policy tests are that the obligations must be:</p> <ul style="list-style-type: none"> - Necessary - Relevant to planning - Directly related to the development - Fairly and reasonably related in scale and kind to the development - Reasonable in all other respects
<ul style="list-style-type: none"> ▪ Our [KICC's] present location is very, very small and does not enable us to serve the community fully. 	Noted.
<ul style="list-style-type: none"> ▪ KICC play an important role in reaching out to youth and their families to present alternative crime-free lifestyles. 	Noted.
<ul style="list-style-type: none"> ▪ The church services that the church provides will be of benefit to the local community in Havering. 	Opinion noted.
<ul style="list-style-type: none"> ▪ We feel that as taxpayers in the borough, we should be able to have a say about the way our money is spent, and we also believe that the borough would benefit from having KICC, and all the additional facilities that it proposes to bring to the area. 	Opinion noted.

11.6

Summary of individual comments received objecting to the application	Response to comment
<ul style="list-style-type: none"> ▪ Major business area offering exceptional employment opportunities to the local community. 	Employment land use designation is discussed at section 13.20 of this report.
<ul style="list-style-type: none"> ▪ Uneconomical use of land, 13.5 acres of land being used to create 75 jobs is frankly unacceptable in an area designated for regeneration. In contrast, the new Newsfax International building is bringing hundreds of high quality jobs on only 2.5 acres. 	As above.
<ul style="list-style-type: none"> ▪ The proposed use conflicts with the publicly consulted Thames Gateway Regeneration Plan. This area was designated to provide highly skilled manufacturing jobs and any release of land for other uses will set a precedent for further plots to be released. Furthermore there is not employment creation, i.e. jobs open to all, as normally understood and remarked upon in the London Thames Gateway Riverside Zone of Chance 	As above.

Regeneration Vision applicable to this site. All 75 permanent staff are to transfer from Hackney and eligibility for most if not all other posts will clearly be confined to members of the applicant organisation. Any suggested local employment benefits are therefore unsubstantiated and should be discounted.	
<ul style="list-style-type: none"> ▪ KICC will bring traffic chaos to the area. 	Transport/Travel is discussed at section 13.21 of this report.
<ul style="list-style-type: none"> ▪ Traffic generation will have a detrimental effect on local business and discourage other businesses from moving into the area. 	As above.
<ul style="list-style-type: none"> ▪ Proposed bus pick up scheme is questionable and unrealistic. 	As above.
<ul style="list-style-type: none"> ▪ The application will be unable to prevent extensive offsite parking by its members travelling by car as asserted in the application. Indeed on their website they give details of roads in the Walthamstow area that do not have parking restrictions and a shuttle service operates from one of these roads. 	As above.
<ul style="list-style-type: none"> ▪ Question who would police the transport proposals? 	As above.
<ul style="list-style-type: none"> ▪ Would enforcement of the transport proposal also relate to third parties to whom the KICC intend to rent the use of the proposed conference facility? 	As above.
<ul style="list-style-type: none"> ▪ To encourage members of their [KICC's] congregation to travel miles to a complex situated where so few of their members live breaks with the Mayors and Government policy of cutting unnecessary journeys to reduce carbon emission throughout the London area. 	As above.
<ul style="list-style-type: none"> ▪ Do not agree that KICC have nowhere to house their congregation. 	Opinion noted.

12. RELEVANT PLANNING POLICY

12.1 The Development Plan comprises of the Havering Unitary Development Plan (adopted March 1993) saved policies and the London Plan (February 2004).

12.2 Havering's Core Strategy and Development Control Policies Submission Development Plan Document (November 2006) is due to be adopted in March 2008. The Site Specific Allocations DPD is due to be adopted in May 2008. The Inspectors report into Havering's Core Strategy was published on 4 October 2007. This concluded that with the amendments recommended in her report the Core Strategy meets the tests of soundness set out in PPS12.

12.3 Material weight has been given to the policies contained in Havering's emerging LDF given its advanced stage of preparation in line with paragraph 18 of the 'Planning System: General Principles' (January 2005).

12.4 The Havering Strategic Flood Risk Assessment was published in November 2007 and is considered to be sound evidence fit for use in the LDF by the Environment Agency in compliance with PPS25.

12.5 **The London Plan (Feb 2004)**

2A.1 Sustainability criteria

2A.2 Opportunity Areas (6 – London Riverside)

2A.3 Areas for intensification

2A.7 Strategic Employment Locations

3A.14 Addressing the needs of London's Diverse Population

3A.15 Protection and enhancement of social infrastructure and community facilities

3A.16 The voluntary and community sector

3A.21 Education facilities

3A.25 Social and economic impact assessments

3B.1 Developing London's economy

3B.2 Office demand and supply

3B.5 Strategic Employment Locations

3B.6 Supporting innovation

3B.12 Improving the skills and employment opportunities for Londoners

3C.1 Integrating transport and development

3C.2 Matching development to transport capacity

3C.3 Sustainable transport in London

3C.16 Tackling congestion and reducing traffic

3C.19 Improving conditions for buses

3C.20 Improving conditions for walking

3C.21 Improving conditions for cycling

3C.22 Parking strategy

3D.12 Biodiversity and nature conservation

4A.2 Spatial policies for waste management

4A.6 Improving air quality

4A.7 Energy efficiency and renewable energy

4A.8 Energy assessment

4A.11 Water supplies

4A.12 Water quality

4A.16 Contaminated Land

4B.1 Design principles for a compact city

4B.4 Enhancing the quality of the public realm

4B.5 Creating an Inclusive Environment

4B.6 Sustainable design and construction

4C.6 Flood plains

4C.8 Sustainable drainage

5C.1 The strategic priorities for East London

5C.2 Opportunity Areas in East London

12.6 London Borough of Havering UDP (adopted March 1993) saved policies as of 27th September 2007

STR1 Havering Strategic Objectives
STR6 Access
STR17 Retention and protecting of Employment and Commercial Areas
STR28 Pedestrians and Cyclists
STR32 Location of uses in Romford and the District Centres
ENV7 Nature Conservation
ENV8 Contaminated Sites
ENV9 Damaged Land
ENV13 Vacant Land
ENV14 Archaeology
EMP1 Rainham Employment Area
EMP5 Main Employment Areas
TRN2 Effect of Development on Public Transport and Roads
TRN3 Public Transport for New Developments
TRN6 Secondary and Local Distributor Roads
TRN11 Public Transport
TRN12 Bus Facilities
TRN15 Cycle Facilities
TRN16 Pedestrian Facilities
TRN17 Facilities for Transport Handicapped Groups
TRN18 Car Parking
TRN22 On Street/Off Street Parking

12.7 Emerging Core Strategy and Development Control Policies Submission Development Plan Document (November 2006)

LDF Core Policies:

CP3 Employment
CP8 Community Facilities
CP9 Reducing the need to travel
CP10 Sustainable Transport
CP15 Environmental Management

LDF Development Control Policies:

DC9 Main employment areas
DC13 Access to employment opportunities
DC19 Locating Cultural Facilities
DC33 Car parking
DC34 Walking
DC35 Cycling
DC36 Servicing
DC37 Safeguarding
DC38 Park and Ride
DC49 Flood Risk
DC50 Sustainable Design and Construction
DC51 Renewable Energy
DC52 Water supply, drainage and quality
DC53 Air quality

DC54 Contaminated Land
DC55 Noise
DC56 Light
DC58 Biodiversity and Geodiversity
DC59 Biodiversity in new developments
DC60 Trees
DC61 Urban Design
DC62 Access
DC63 Crime
DC72 Planning Obligations

12.8 Other Relevant Planning Policies & Supplementary Planning Guidance

RPG9a The Thames Gateway Planning Framework
PPS 1: Delivering Sustainable Development
PPS 6: Planning for Town Centres
PPS 9: Biodiversity and Geological Conservation
PPS 10: Planning for Sustainable Waste Management
PPS 12: Local Development Frameworks
PPS 22: Renewable energy
PPS 23: Planning and Pollution
PPS 25: Development and Flood Risk
PPG 4: Industrial, commercial development and small firms
PPG 13: Transport
PPG16: Archaeology and planning
PPG17: Planning for Open Space, Sport and Recreation
PPG 24: Planning and noise
RPG9a: Thames Gateway Planning Framework

12.9 SPD

Sustainable Construction (Havering)

12.10 Other relevant material considerations & SPG's

The Further Alterations to the London Plan, which have undergone public consultation (dated September 2006).

An Urban Strategy for London Riverside, adopted July 2002 - states that Beam Reach Business Park "will provide 35 hectares for modern advanced manufacturing businesses, including strategic sites for inward investment, move-on accommodation from the Business Innovation Centre, and a suppliers' park for diesel engine components".

The London Plan: Sub-Regional Development Framework, East London, May 2006.

13 ASSESSMENT OF MAIN ISSUES

13.1 Environmental Issues

- 13.2 LTGDC Officers have taken environmental information into consideration in the assessment of this application in accordance with the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999.
- 13.3 The applicant sought a screening opinion in January 2007, in respect of the need or otherwise for an Environmental Impact Assessment for the proposed redevelopment of the site for the erection of a temporary auditorium structure capable of seating 5,000 people and associated uses, a separate two storey temporary office building and grade level car parking. It was concluded that an Environmental Impact Assessment (EIA) was/is required.
- 13.4 An EIA scoping report (prepared by Whitbybird) was submitted in January 2007, with a request for a scoping opinion.
- 13.5 The Corporation resolved (on the 19th March 2007) that the proposal is an application for which an environmental impact assessment is required in accordance with Regulation 10 (b) the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999. The application is accompanied by an Environmental Statement.

13.6 Socioeconomic Impacts

The ES predicts the socio-economic impact of the proposed development to be entirely beneficial. It states that moderate benefit will be derived from the employment opportunities created by the proposal, both during construction and in relation to permanent position, as well as substantial benefit in relation to the community benefits that will result from the proposed development.

Officers do not agree that the development will have a substantial beneficial impact on the provision of community facilities because of its poor walking and public transport accessibility. This is notable having regard to the provisions of policy CP8 of Havering's emerging Core Strategy and Development Control Policies Development Plan Document (dated November 2006) and 3A.15 of the London Plan (adopted February 2004) which seek to locate community uses in areas within easy reach by walking and public transport of the population that use them. As such the development would not provide readily accessible community facilities.

13.7 Noise and Vibration

The nearest residential receptors are located at Creekside between Rainham Creek and the sewage works approximately 500 m away and the residential communities of South Hornchurch to the north of the A1036 400m to the north. Trees and existing industrial units provide screening to some receptor positions.

The ES predicts that:

- no significant noise or vibration effects are expected as a result of on-site constriction;
- negligible road traffic noise increases have been identified and no significant road traffic noise or vibration effects are expected;
- operational road traffic noise and noise associated with the use of the car park is not considered to be significant given high ambient noise levels from the adjacent A13 and giving the screening influence of commercial buildings on the A1306;
- during the operational phase, no significant impacts are anticipated from the use of the temporary auditorium. Enhanced, acoustically insulated panels can be provided if noise break out needs to be controlled further. The permanent auditorium will be constructed from heavier materials to a high specification of acoustic insulation. Subject to compliance with planning and/or licensing conditions, there will be no significant impacts associated with the operation of the temporary or permanent auditoria during music performance events.
- No significant impacts will arise from the operation of the other buildings;
- No significant impacts are expected from fixed installations/plant/equipment or commercial premises. It is acknowledged that any mitigation requirements can be dealt with through planning conditions.

The ES assumes that the proposed piling method for the proposed development will be the rotary piling technique, which would give rise to considerably lower magnitudes of ground borne vibration than the vibratory driven or percussive techniques. However, until such time as the appointed contractor is able to confirm this assumption the ES takes a prudent approach, considering a worse case scenario for the purposes of the assessment. It would be possible to prescribe rotary piling by planning condition.

Event Noise – The use of both the temporary and permanent auditorium will introduce the following potential noise sources:

- Crowd noise from Church congregations and other public events;
- Amplified speech and music during church congregations provided by a front of house sound system;
- Amplified music during public and private performances; and
- Plant and Equipment associated with building services and catering facilities.

The ES recognises that it will be incumbent upon the eventual contractor to demonstrate that Best Practicable Means are employed at all times and that this may require certain mitigation measures to be incorporated.

The general noise and vibration assessment methodology and summary information provided is generally satisfactory. Table 8.10 of the ES states that, “there are no receptors within the spatial scope considered which are classified as being of High sensitivity (for example, listed buildings or SSSI)”. LTGDC Officers note the very close proximity of the development site to Mudlands site of importance for nature conservation (SINC). Any approval of the application should include planning conditions to ensure that the effects of noise are mitigated as far as possible, and that appropriate means of control are in place to protect the amenities of sensitive receptors, with particular regard to the nearby SINC. It is

possible to require by condition that no amplified music or speeches shall be audible outside any building.

13.8 Ecology and Nature Conservation

The ES predicts that it is probable that the development will not result in significant residual impact (i.e. following mitigation) during construction. During operation, no significant adverse impacts are predicted.

An assessment of potential impacts on ecological receptors associated with the proposed development has been undertaken, including an extended Phase 1 habitat survey, desk study and surveys for protected species invertebrates, great crested newts, reptiles and ground nesting birds.

The proposed development will result in the loss of habitat including existing trees and vegetation/bare ground possibly supporting two Nationally Scarce invertebrate species. However the application site has been shown not to support reptiles and is also mostly unsuitable for ground nesting birds such as lapwing and little ringed plover. The development site supports less diverse habitats than the adjacent Mudlands SINIC, and the development proposals include two brown roofs, green walls, ditches and hedgerow, which will provide new habitats for invertebrates and breeding birds, including nesting birds.

The development proposal incorporates beneficial biodiversity features as part of the design in accordance with the provisions of PPS9; policy DC58 of Havering's emerging LDF; policy 3D.12 of the London Plan; The Mayor's Biodiversity Strategy and Havering's Biodiversity Action Plans. The provision of additional habitat for invertebrates and breeding birds is welcomed.

13.9 Transport

The impacts of the proposed development are predicted in the ES as having negligible effects. It is also stated that even in the worst case, impact will only have a slight adverse significance. The impacts are intended to be mitigated through a Travel Plan for the site. Key features of the proposed travel plan are considered in greater detail at paragraph 13.21 below.

The ES states that the impacts of the development are related to the volume of traffic generated by the site. It largely considers traffic impacts for Sundays. These have been assessed by comparing the generated traffic from the proposed development with the baseline flows. The baseline assessment presents that the study area around the site is largely of only local importance. No receptors are identified in the ES that can be considered to have a very high or high sensitivity to changes in environmental conditions in terms of traffic.

Data on traffic flows and personal injury accidents have been gathered to show that the area surrounding the site is not subject to abnormal conditions or road safety issues.

The impacts on junctions have been assessed, including analyses on the A13 junction with Marsh Way in collaboration with the LDA and its consultants.

The impact of car-borne traffic on the study area is proposed to be addressed through the limitation of on site parking spaces and availability of those spaces.

It is also recognised in the ES that a crucial part of the Travel Plan as mitigation is the monitoring of travel to the site. This will allow the efficacy of the measures to be reviewed, deficiencies identified and remedial actions agreed with the Highway and Planning Authorities.

A traffic signal control regime designed to deal with traffic accessing and egressing the site at the junction with the A13 is proposed.

Reference is made to an event hosted by KICC known as the International Gathering of Champions (IGOC). This will have an impact at other times to the normal pattern of events at the site. It is contended that that impact will be in the context of high daytime baseline flows leading to smaller proportional impacts on baseline conditions and of being a once per year event.

The IGOC is now in its 14th year and attracts around 160,000 people over eight days, annually in August. It is a conference that features: guest speakers from Africa, America, Europe, the Caribbean and Australia; local and international Gospel music artists; a 130-stand exhibition and multi-cultural food court.

The ES recognises that the success of this management strategy will depend on two supporting elements of the Travel Plan. These are a private shuttle bus and mini-bus services to be provided for members and the management of car parking on the site and surrounding area. LTGDC Officers consider the proposals contained in the Travel Plan to be incomplete. No firm evidence has been presented demonstrating the successful operation of the shuttle bus service or the effective management and enforcement of car parking issues that are likely to arise in the locality as a direct result of the proposed development. Even if it were demonstrated that such measures might work, legal mechanisms to secure them have not been demonstrated.

The proposal is considered to be unsustainable in terms of transport regeneration by virtue of being a high trip generator and travel intensive, resulting in an unacceptable increase in noise, pollution, congestion and on-street car parking. Therefore the transport impacts are considered to be significant. The cumulative negative impacts are likely to be worse during the IGOC and when West Ham United plays at home (Upton Park). This type of cumulative effect has not been considered.

13.10 Water Resources

A Flood Risk Assessment, drainage strategy, water load assessment and an Environmental Risk Management Strategy have been prepared to assist with the design of the proposed development, to ensure that the effect on water resources is minimised.

The ES impacts of the proposed development are predicted to have moderate beneficial impacts because the scheme will reduce the effect of flooding

downstream.

LTGDC Officers concur that the development presents moderate beneficial impacts and that appropriately worded conditions should be imposed on any planning consent to prevent pollution of the water environment. The comments received from the Environment Agency confirm that the proposal is likely to reduce surface water run off and improve water quality in addition to creating additional habitat for wildlife.

Environment Agency has confirmed that it is satisfied with the application in terms of flood risk providing the conditions requested are imposed on any planning permission granted.

13.11 Air Quality

Estimates of the air quality are made at five representative receptors for a number of scenarios to determine the impacts that the development will have on air quality.

The ES predicts that the effect on air quality of emissions to atmosphere from the proposed development at the five specific receptors is negligible.

The only proposed mitigation measures required are to control the impacts on air quality is to control emissions of dust during construction in line with best practice. A planning condition may be used require that this is implemented.

The London Borough of Havering was consulted concerning the prevalence of odours in the vicinity of the Riverside Treatment Works. Given that the location of the application site is upwind of the works and its non-residential use, it was suggested that odours are unlikely to be a problem and thereby no specific mitigation is required in the proposal. In this instance, air treatment units (scrubbers) on air intakes are not required.

There is the potential for cumulative impacts to occur within the wider proposals for Beam Reach 5 and 6. The ES includes a table showing the estimated annual average concentration of nitrogen dioxide (NO₂) fine particulate mater (PM₁₀) due to mission from the road network and in combination with the expected background concentration, which include the cumulative impacts associated with the wider proposal for Beam Reach 5 and 6.

Policy 4A.6 of the London Plan seeks to ensure that at the planning application stage, air quality is taken into account along with other material considerations and that formal air quality assessments are undertaken where appropriate, particularly in designated Air Quality Management Areas. Havering policy DC53 of its emerging LDF states that planning permission will only be granted where new development, both singularly or cumulatively, does not cause significant harm to air quality, and does not cause a breach of the targets set in Havering's Air Quality Management Area Action Plan (HAQMAAP). LTGDC Officers are satisfied that no significant harm to air quality is presented by the development proposal during the construction or operational phases.

13.12 Microclimate

An analysis of reflected glare from the proposed building facades onto locations within the site and its locality has been carried out to determine those impacts which may cause discomfort and reduced safety to receptors.

A wide range of adverse impacts have been identified that can be mitigated as follows:

- Provision of glare control to all windows of the support, chapel, office and multi-purpose buildings;
- Provision of shielding strategy within the internal layout of the car park building;
- Specification of non-reflective materials to the outward facing facades of the office and multi-purpose buildings;
- Extension of the proposed tree planting scheme to provide continuous shielding around the site entrance and exit, and around the internal access roads and pedestrian drop-off points;
- Specification of non-reflective materials to seven specific facades of the auditorium, and eight specific facades of the multi-purpose building; and
- Specification of non-reflective materials to the extensions of the Auditorium facades to cover the plant buildings, included in the scheme modification of 24 May 2007 and 22 June 2007.

All glare impacts require complete mitigation / control as described above.

LTGDC Officers are satisfied that the suggested mitigation measures, if implemented, would address the negligible cumulative solar effect and residual glare impacts associated with the proposed development. This can be controlled through the use of a planning condition.

13.13 Soils and Geology

A Site Appraisal and Environmental Risk Management Strategy have been undertaken for the site (with an appended Chemical Test Results). The baseline conditions and site model has been developed on the basis of findings from recent ground investigation.

The ES identifies the significance of various topic headings regarding soils as follows:

- Topography – during construction phase is considered negligible.
- Topography – during operational phase is considered negligible.
- Land Use – during construction phase is considered negligible.
- Land Use – during operational phase is considered negligible.
- Geology – during construction phase is considered negligible
- Geology – during operational phase is considered negligible
- Contamination – during construction phase is considered slight.
- Contamination – during operational phase is considered moderate.

Various mitigation measures are set out at Table 14.6 of the ES.

Following adoption of the mitigation measures the overall significance of the environmental effects is considered negligible during construction and slight beneficial during operation of the development. During construction, these potential risks are proposed to be managed through appropriate design construction techniques combined with appropriate site management.

LTGDC officers are satisfied with the methodology presented in the ES, and note that the Environment Agency has not yet been sent the final remediation validation report to review.

13.14 Landscape/Townscape - Visual Amenity

Townscape: The ES states that the temporary auditorium will have a residual moderately beneficial impact on Townscape. The toilets and offices will have a residual minor adverse impact.

The proposed permanent redevelopment is stated to have a significant beneficial residual effect on the character of the area. A summary of the predicted impacts is set out in table 15.4 of the ES.

The cumulative impact of the development, when considered in the context of the whole of Beam Reach site and possible forthcoming developments within the site, is described in the ES as having beneficial visual impact on the surrounding and immediate townscape character.

Seven key views were identified and the impact and significance of the effect was estimated by assessing the magnitude of the effect compounded with the sensitivity of a number of receptors.

Landscape: Landscape impacts include the direct and indirect impacts of the proposed development upon the landscape elements and features as well as the impact upon the general landscape character of the surrounding area. The ES states that no significant adverse impacts are expected therefore mitigation measures are not deemed to be necessary.

No residual impacts are expected on completion or operation of the proposed development.

It is envisaged that over the long term the proposed landscape scheme for the site together with existing surrounding vegetation and central native area within the park will establish a framework of native green planting in which the new buildings will sit.

It is recognised that cumulative impacts could not be assessed because the business park and surrounding regeneration areas have not yet been designed or completed.

LTGDC Officers concur with the findings of the ES in respect of Landscape/Townscape visual amenity and consider that appropriately worded conditions should be imposed on any planning permission to ensure that the suggested mitigation measures are implemented.

13.15 Waste

Baseline site conditions were established from a review of relevant data, including waste strategies and through consultation with local landfill and recycling operations and the Environment Agency.

The most important issues arising from construction of the proposed development relate to the creation of waste material requiring off-site disposal or re-use. Little or no hazardous waste is expected to be produced from the site due to the proposed construction methods. A small volume of waste may arise as a result of site-levelling during enabling works and minimal spoil is anticipated to be required to be removed off-site.

Landfill capacity for deposition of inert waste is sufficient at present, however should landfill capacity within the region be exhausted, waste materials will require transport over greater distances with associated financial and environmental costs and the significance impacts increased from negligible/slight, to moderate to substantial.

If the prescribed mitigation measures are implemented, the ES predicts that the waste generated by the proposed development will have negligible to low significance impacts.

LTGDC Officers concur with the findings of the ES in respect of Waste and consider that appropriately worded conditions should be imposed on any planning consent to ensure that the suggested mitigation measures are implemented.

13.16 Principle of proposed land use(s)

The application is for a major mixed-use development with primary uses falling into the D1 and D2 Use Classes with additional Class B1 (a) offices and ancillary uses.

Use Class	Floor space (m² gross)
D1	16,327
D2	2,029 ¹
B1	5,358
A1	50
A3	686
Sui Generis – Car Park	36,449
Total	63,355

¹ Excludes floor space for D2 use in the Auditorium as the building will be used for both D1 and D2 and its primary use is D1.

The site lies within the Rainham Employment Area identified in the UDP where policy EMP1 applies. This generally encourages business and industrial uses (B1 and B2), with the possibility of other development including warehousing and other transport related uses which provide employment opportunities and do not conflict with other policies of the plan. This is supported by the Urban Strategy for London

Riverside (July 2002), which states that Beam Reach Business Park will provide 35 hectares for modern advanced manufacturing businesses, including strategic sites for inward investment, move-on accommodation from the Business Innovation Centre, and a suppliers' park for diesel engine components.

Furthermore, The London Plan 5.73 and 5.74 support these principles, stating that the core employment area should be developed as a leading centre for innovation and high-tech manufacturing, for industries that serve London, and for the growth sector of environmental technology.

The London Plan designates Beam Reach as Strategic Employment Land, an allocation that is continued in the London Plan Further Alterations document by its designation within a Strategic Employment Location (SEL). Policy 5C.1 sets out the strategic priorities for East London. One of which is to improve the variety, quality and access to available employment sites, especially within Strategic Employment Locations.

The applicant contends that the proposed development represents an employment generating use which would contribute to other strategic priorities for East London as set out in Policy 5C.1 of the London Plan.

Policy CP3 (Employment) of the Core Strategy DPD states that a range of employment sites will be available to meet the needs of business and provide local employment opportunities. It states, "in the Beam Reach Business Park, prioritising advanced manufacturing uses and other modern industries in the B1 (b) (c) and B2 use classes which provide a similar quality and intensity of employment".

In considering the soundness of the Core Strategy DPD against each of the tests of soundness set out in PPS12, the Inspector's interim report on the examination into the London Borough of Havering Core Strategy dated 4th October 2007 refers specifically to Beam Reach Business Park (paragraphs 4.35 – 4.39) and considers policy CP3 (Employment) stating that, "In light of the proximity of Beam Reach Business Park to the CEME, the limited percentage of employment land that would be restricted in respect of B8 uses and the areas of B8 uses proposed just to the east, I consider that no change is necessary to CP3 in this respect and in so doing the policies in the RSS would not be undermined/harmed". She also considered that reference to Main Employment Areas should be changed to Strategic Industrial Locations. Hence, she placed weight not just on job creation but on the nature of the employment generating use.

Policy DC9 of Havering's emerging LDF reaffirms the uses which are to be prioritised within the Beam Reach Business Park as advanced manufacturing uses and other B1 (b) (c) and B2 uses which provide a similar quality and intensity of employment and a high standard of design.

SEL designation – The applicant does not propose any revision of policy or formal release from the SEL designation. Rather, requests that this application be, 'promoted as a unique exception to the policy, based on a relocation necessitated by the Olympic Games development, coupled with a critical timescale'. The case of exception is put forward in this application as justifying overriding the SEL designation.

The Mayor of London's Draft Further Alterations to the London Plan continues the designation of Beam Reach within a Strategic Industrial Location, and identifies the need for such sites to be used for waste uses, logistics and wholesale markets as well as industrial uses: the specific wording on employment sites in London Riverside is retained.

The proposal to use the site as a place of worship with associated pastoral, community and office uses and facilities would not be in accordance with the above policies, objectives and priorities, and would prejudice the strategic objectives for Beam Reach and the creation of a defendable industrial/employment area, potentially setting precedent for other developers to come forward with inappropriate development on the remaining sites within the subject business park.

LB Havering's emerging LDF provides that Beam Reach Business park is prioritised for advanced manufacturing and other modern industries with allowance for other uses "where they provide a similar quality and intensity of employment within a high quality development commensurate with the business park environment" (policy DC9 and reasoned justification). The proposed use is discordant with the policy DC9 in this respect. This is because it will not provide the same quality of employment – it is not likely to enhance skills in advanced manufacturing or modern industry. Further, the number of jobs is not commensurate with that type of use.

The subject application site falls within Rainham Employment Area, which has been designated as a Main Employment Area. In line with the findings of Havering's Employment Land Study, the Core Strategy has rationalised the extent of Main and Secondary Employment Areas in the borough and released 34 hectares of land from employment use. This includes a significant reduction in the amount of employment land in the vicinity of Beam Reach by seeking to retain only 33% of the Rainham West site to the north of the London – Tilbury – Southend railway line, for B1 (a and b) employment uses. The effect of this however, is to reinforce the importance of the Beam Reach sites as part of a critical mass of employment land to be retained.

With regard to mixed use intensification Havering's SPG5 Industrial Capacity and Mixed Use Development states that boroughs should: 'identify strategically recognised industrial sites or parts of sites which have good public transport accessibility, especially those within or on the edge of town centres, for industry led, higher density, mixed redevelopment. This re-development should not incur a significant net loss of industrial employment capacity or compromise the offer of wider areas as competitive industrial locations.' The KICC proposal does not satisfy this guidance.

Table 1G.2 of the East London SRDF provides Indicative Borough monitoring Benchmarks for the Transfer of Industrial Land to other uses 2001-2016 (in hectares). In line with PPS3 and Policy 3B.5 of the London Plan Alterations Havering has undertaken an assessment of industrial demand to justify retention and inform release of industrial capacity. This identifies the release of 34 hectares of land for Havering which corresponds to the East London SRDF guidance both in quantity and location.

Paragraph 141 of the SRDF confirms this, stating that: 'land released for housing

and other community purposes should as far as possible consider sites in locations which have or can be made to have an attractive environment, diverse local facilities and high public transport accessibility. Care must be taken to avoid the emergence of isolated communities and to maintain the viability of retained industrial areas.'

Places of worship – The proposed primary planning use falls within use class D1 (h) non-residential institutions (non-residential institution for, or in connection with, public worship or religious instruction). D1 land use of this nature is likely to have different spatial and environmental requirements to business and industrial uses, being of a substantial scale. This is because a D1 land use requires accessibility to large numbers of visiting members of the public.

Main services (worship) are proposed to be held on Sunday mornings and Wednesday evenings in addition to the IOG as described in section 13.9 above.

Havering's emerging LDF identifies places of worship as a community facility (page 113) and policy CP8 (Community Facilities) provides that, "The Council will work in partnership with other bodies to ensure that a suitable range of community facilities are provided to meet existing and forecast demand by: ensuring all new community facilities are located in places that are accessible by a range of transport, including walking and cycling, and that the development itself is accessible to all groups".

Havering seek to facilitate the provision of a suitable range of community facilities to meet existing and forecast demand arising from the needs of the community and that any such new facilities should be located in accessible locations. It is plain that neither of these criteria are met by the KICC proposal.

When fully operational the permanent auditorium will hold up to 8,000 people and the support facilities potentially up to a further 2000 people. The car park on the site will hold up to 1200 vehicles. Temporary facilities will have a capacity for up to 5000 people and up to 425 car parking spaces.

The growth of KICC from having 300 to 1200 members over the past 15 years demonstrates that the organisation provides a service of value to a large number of people. KICC's membership comprises diverse and multicultural ethnic groups. London's black and ethnic minority groups are a targeted equality group in the London Plan. The Mayor has provided Supplementary Planning Guidance to the London Plan, *Planning for Equality and Diversity in London*, which sets out three key issues relating to spatial planning for equality and promoting diversity as follows:

- The relationship between spatial planning and wider social issues;
- Overarching principles for planning for equality in London; and
- Addressing the equality elements to key spatial planning issues.

Specifically, London Plan policies 3A.14 and 3A.15 also support the provision of community facilities, including places of worship, building upon London's diversity, and being sensitive to the needs and preferences of London's constituent groups. Policy 3A.15 seeks to ensure that appropriate facilities are provided within easy reach by walking and public transport of the population that use them. The index of public transport accessibility (PTAL) rating for the site is 1. The topic of site accessibility is further discussed in section 13.21 of this report.

The principle of the proposed land use has more than local significance and is not acceptable having regard to the aims of both local and regional planning policy fully taking into account the policies regarding places of worship and equality and diversity issues.

The proposed land use is contrary to the land uses that have been identified for Beam Reach in the Development Plan (London Plan and saved UDP policies); The Inspector's recent report into the London Borough of Havering Core Strategy; Sub-Regional Development Framework for East London; and Urban Strategy for London Riverside. It is considered that the proposal, if approved, would prejudice the strategic objectives for Beam Reach and the creation of a coherent industrial employment area, potentially setting precedents for other developers to come forward with inappropriate development proposals on the remaining plots within the subject Business Park. The proposed use is not located in an area that is easily accessible by public transport for the majority of its potential regular users. The use relies on mitigation of its short comings in accessibility terms.

The land use designation policies prescribed in the development plan do not discriminate positively or otherwise and whilst there are policies in the London Plan, and Supplementary Planning Guidance (Planning for Equality and Diversity in London, October 2007), supporting proposals to assist the provision of facilities for London's diverse population, these have to be balanced against policies regarding safeguarding employment areas and ensuring developments are readily accessible by public transport. Positive action to shift the balance in favour of the proposed land use based on the fact that members comprise of a diverse and multicultural ethnic make up could be viewed as representing an unlawful emphasis on a matter that is not of significant weight or material to this application.

Officers do not consider that the development proposals modest benefit to the local community or, even if it did, that this justifies the grant of planning permission contrary to the clear policies of adopted and emerging planning policy.

The principle of the B1 element of the proposal is considered to be acceptable, but this is a lesser part of the overall proposal in both scale and impact. This is ancillary use – it cannot be used to justify an unacceptable dominant use.

As discussed above, the entire thrust of planning policies since the 2004 London Plan is that Beam Reach is part of the strategic reservoir of industrial land in London and should be protected and developed for industrial-related uses. This is reinforced by the recently agreed Core Strategy DPD which identifies where release of industrial land could be supported. Furthermore, this land is considered by policy to be part of a valuable sub-category of industrial land. LTGDC Officers have not identified any compensatory measures that could be imposed through the use of conditions or clause(s) that would make the proposed primary uses (D1 and D2) acceptable on the site, enabling the grant of planning permission. Acceptance of the proposed land use at the scale proposed would undermine Havering's emerging core policy document, key aspects of the emerging Altered London Plan and long term aspirations for the subject SEL.

13.17 Urban Design

All development should follow the principles of good design set out in London Plan policy 4B.1 (Design principles for a compact city), particularly:

- Design to maximise the potential of the site
- Design the layout so that it is permeable to all users
- Carry out a local character survey, and implement the recommendations
- Design the development so that all users can easily find their way around the development (legibility)
- Design an attractive development

Policy ENV1 of Havering's adopted UDP was not saved by the Secretary of State's direction under paragraph 1(3) of Schedule 8 to the Planning and Compulsory Purchase Act 2004. Therefore regard has been given to Policies DC61 (Urban Design), DC 62 (Access), DC63 (Crime), and Core Policy 17 (Design) of Havering's emerging LDF, which seek to:

- Maintain or improve the character and appearance of the local area in its scale and design;
- Provide a high standard of inclusive design so it is accessible to those who require access to it; and
- Be safe and secure in its design and contribute to community safety.

The application is accompanied by a Design and Access Statement prepared by Sheppard Robson. That document explains how the proposed design has evolved further to exploring other alternatives. Four generic design principles were agreed through consultation with Design for London, namely:

- Development should not be pavilions in landscaped park;
- Development should have a street / urban feel;
- Building volumes should be pushed to the outside edges of the site, with external landscaped spaces contained within the inner part of the site; and
- Development should be stacked where possible / appropriate to ensure optimum density of development.

The Thames Gateway Planning Framework (RPG9A, DoE June 1995) promotes a 'new environmental standard' for the East Thames Corridor. LTGDC Officers are satisfied that the development proposal incorporates a high standard of architectural design which would enhance urban environmental quality, if the suggested mitigation measures regarding addressing the cumulative solar effect and residual glare impacts are implemented.

London Plan Policy 4B.1, states that the Mayor will seek to ensure that new developments maximise site potential, enhance the public realm, provide a mix of uses, are accessible, legible, sustainable, safe, inspiring, exciting and respect London's natural and built heritage, amongst others. The permanent auditorium and multipurpose building are largely consistent with the Mayor's design and architectural policies and offer an interesting and modern approach to designing church buildings. On the issue of accessibility, the very low PTAL rating and location of the site make the site difficult to access.

The main auditorium dominates the site, offering visibility from the A13 at a height of approximately 33m. The glazed façade will be visible from the approach on Marsh Way. The building consists of a folded plate structure, which comes down to the ground on the southern two sides, and lift up to the northern sides. A standing-seam aluminium system such as Kalzip is the preferred solution to the exterior finish of the building. The large glazed area to the north will be as transparent as possible, incorporating a tension cable system to take all wind loads to a stable frame. A small support building will be located behind the main auditorium, which is to have a brown roof, increasing site biodiversity.

Internally, the finish of the external paved areas will continue into the foyer area of the auditorium space. The internal finish of the roof will use a diagonally-braced glulam timber trussed system, which is to remain exposed, with the infilling triangulated panels in white. There are no servicing elements on the soffit, so the uplighting can remain uninterrupted.

Approximately 6000 seats will be at the lower/main level and about 2000 at balcony level. Within each area there will be spaces for wheelchair users so that all attendees at events and services can choose their place.

Both gendered and non-gendered fully accessible WCs will be provided.

Consideration has been given to heat-losses. The main auditorium space, when occupied, will always have a positive heat load and ventilated glazed facades with external solar shading have been incorporated to protect the spaces inside from excessive solar and heat gains.

Orientation – KICC do not have specific requirements regarding the orientation of the building so the design does not follow a traditional western-European, Christian, east-west orientation.

The Multi-Use Building is similar in concept to the main auditorium, forming the second significant area of worship on the site. The proposed materials both externally and internally, are consistent with the main auditorium.

A net landscape benefit would be achieved in addition to the beneficial biodiversity features as part of the design in accordance with the provisions of PPS9; policy DC58 of Havering's emerging LDF; policy 3D.12 of the London Plan; The Mayor's Biodiversity Strategy and Havering's Biodiversity Action Plans.

Permanent Car Park structure consists of a concrete column, slab and beam construction. Large galvanised frames supporting tensioned cables are proposed to span between columns and from column face to face respectively, which would be used to provide a climbing surface for plants, creating 'green screens'.

All vertical circulation, such as stairs and lifts and the platforms are fitted to the exterior of the structure and are proposed to be of a steel construction. Internally, soffit lighting and servicing is to be coordinated within the structure. All internal markings would be painted with pedestrian zones clearly marked.

Permanent Chapel is a simple box, closed on three sides and glazed on the fourth with a prominent overhang to define the clerestory area below. Rooflights are inserted into the modular, gravel roof, which is to be provided with a grid of drainage. The west facing full-height glazed wall is screened by horizontal timber louvers. There will be level access to the chapel from the prayer garden.

The office and refectory building forms an L-shape with a fully glazed refectory at ground floor level and offices above. It is proposed to have a brown roof to increase site biodiversity. The rear service wall to the north west is opaque and to be constructed out of a metal panel system. A rainscreen of various terracotta finishes is to be fitted to the facades. Office windows are to be 2m high per floor, starting at desk height. This is to improve energy efficiency through increasing u-value. An external louver system is proposed to be applied to the external elevations on all levels above the ground to protect from excessive solar gains.

Lighting – Service, architectural and landscape feature lighting are proposed throughout the scheme. A specialist lighting design would be employed to develop a coloured lighting display to define the principal buildings.

Landscaping Paths and landscaped areas will generally be level, comprising of:

- A Central Plaza area, which is intended to act as a congregation area that provides semi public space. This area will contain raised seat/lawn planters and water features;
- A Refectory Garden with chairs and tables to provide a spill out area for the café;
- A Chapel Garden with raised planters and green walls on the façade of the multi storey car park; and
- A Utility Lawn is proposed adjacent to a play space area and the Multi-Use Building.

Planting palettes have been suggested for each of the landscaped areas together with material palettes for hard landscaping and paved areas. Consideration has been given to sustainable drainage reduce surface water run off.

Boundary Treatment - The site will be enclosed by and 1800mm high fence to all boundaries and there will be secure gates at each entrance. Mixed hedgerows and tree planting are proposed along the perimeter of the site.

The proposed built form, layout, scale, bulk and massing are considered to be of a high quality that is modern, legible and clean in appearance. The height at approximately 33 meters would be suited to the wider context in terms of proportion and composition and in terms of its relationship to the proposed scale of the Business Park. The permanent multi-storey car park and office building establish a buffer between the core business/activity areas and future adjacent development sites.

The proposal comprises of two distinct building elements: (i) the main auditorium and multi-use building; and (ii) the office, chapel and car park. The two elements are considered to be complimentary. The contrasting finishing materials reinforce the intention to provide two distinct building elements. The elevations are effectively animated by the use of glazing, louvers, lighting, planting and raw finishes.

Officers are satisfied that the sustainable design incorporates the principles and objectives of PPS1 which calls for high-quality design to create places that address the needs of all in society and are accessible to all, useable and easy to understand.

13.18 **Sustainability**

Sustainability measures are proposed to be adopted regarding materials, transport, water, waste, health and comfort, pollution and land use and ecology.

Energy – A Sustainability and Energy Efficiency Study prepared by Whitbybird has been submitted as part of the application. It considers seven renewable technologies, determining Biomass as the best solution for this development in achieving carbon emissions reductions.

A 20% reduction in carbon emissions is targeted for both temporary and permanent buildings through the use of two 250kW biomass boilers. This is considered to accord with the objectives of policy 4A.7 of the London Plan, which seeks to reduce carbon dioxide emissions in line with the Mayor's Energy Strategy. Policy DC51 (renewable energy) of Havering's emerging LFD seeks a predicted CO₂ reduction of at least 10%.

The supporting Sustainability and Energy Efficiency Study submitted as part of the application suggests a possibility of obtaining a BREEAM rating of excellent in all the permanent buildings. Policy DC50 (sustainable design and construction) of Havering's emerging LDF requires confirmation that major developments will achieve a rating of at least Very Good. LTGDC would require the imposition of a planning condition to ensure that the suggested BREEAM excellent rating is achieved.

LTGDC Officers are content that the proposal will meet the targets for the generation of renewable energy in line with the provisions of policy 4A.7, if it can be demonstrated that the CO₂ savings are genuine and sufficient. LTGDC Officers would wish to know what percentage of the fuel is to be bio-diesel and where it is going to be sourced from. The application refers to 'The Energy Corps' Company' having confirmed that a biomass fuel depot will be located in Dagenham. It should be demonstrated that the supplier of the fuel is accredited under the Renewable Transport Fuel Obligation. The corporation would seek the submission of a Renewables Strategy in respect of the development through a s106 agreement to ensure that the reduction in carbon dioxide is long term and improves the sustainability and environmental performance of the built environment.

Biodiversity – Policy 3D.12 (Biodiversity and nature conservation) seeks a proactive approach to the protection, promotion and management of biodiversity in support of the Mayor's Biodiversity Strategy. Policies DC59 (Biodiversity in new developments) and DC60 (Trees) of Havering's emerging LDF seek conformity with the Havering Biodiversity Action Plan targets, as an integral part of new development.

LTGDC Officers are satisfied that the ecological works across the development will

increase biodiversity and water attenuation. This will be achieved through the use of native planting palettes; the provision of vegetated ditches to encourage fauna and flora; the creation of a swale feature; the incorporation of brown roofs; formal landscaping and enhanced water attenuation measures.

LTGDC Officers are satisfied that the proposal incorporates beneficial biodiversity features as part of the design in accordance with the provisions of PPS9; policy DC58 of Havering's emerging LDF; policy 3D.12 of the London Plan; The Mayor's Biodiversity Strategy and Havering's Biodiversity Action Plans. The provision of additional habitat for invertebrates and breeding birds is welcomed.

Waste produced during construction will be monitored and segregated to encourage waste management and recycling.

Facilities will be provided to encourage building users to make use of the Council recycling collection. Suitable internal space will be provided for the separation and storage of recyclables for collection by the local refuse collection department.

Regard has been given to the provisions of policy 4A.2 (Spatial policies for waste management) of the London Plan; policies DC40 (Waste Recycling) and DC41 (Re-use and Recycling of Aggregates) of Havering's emerging LDF; and PPS10 (Planning Sustainable Waste Management). The proposal is considered to be acceptable in terms of waste if the prescribed mitigation measures are implemented. These may be secured by planning condition.

13.19 **Sustainable drainage and flood risk management**

The site is partly located in Flood Zone 3a (high risk of flooding). This zone comprises land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%) or a 1 in 200 or greater annual probability of flooding from the sea (0.5%) in any year, the latter does not take into account the presence of flood defences.

In accordance with PPS25, a flood risk assessment was undertaken as part of the Environmental Impact Assessment that formed part of the planning application (see appendix E to the ES). A Drainage Strategy also accompanies the application. The Environment Agency has confirmed that it is satisfied with the application in terms of flood risk providing the conditions that it has requested are imposed on any planning permission granted.

LTGDC considered the sequential and exceptions test for the proposed development in accordance with the requirements of PPS25. The Environment Agency has confirmed that the Test meets the requirements of PPS25.

Regard has been given to Policies DC49 (Flood Risk) and DC50 (Sustainable Design and Construction) of Havering's emerging LDF 4A.15 (Climate Change) of the London Plan. LTGDC Officers consider the proposal to be acceptable in terms of flood risk management and sustainable drainage if the proposed flood proofing, mitigation measures and Sustainable Drainage Systems are used for on site attenuation. In addition, all of the conditions suggested by the Environment Agency should be imposed, implemented and monitored.

13.20 Employment

The application site falls within Rainham Employment Area EMP1 as identified in the Havering adopted Unitary Development Plan (adopted March 1993). The Secretary of State saved policy EMP1 in her assessment of whether saved policies should be extended following September 27th 2007.

Policy EMP1: IN THE RAINHAM EMPLOYMENT AREA (as defined on the Proposals Map and set out in Schedule 6) THE COUNCIL WILL ENCOURAGE BUSINESS AND INDUSTRIAL USES (USE CLASSES B1 & B2 ONLY).

WAREHOUSING AND OTHER TRANSPORT RELATED USES. THE COUNCIL MAY ALSO PERMIT OTHER DEVELOPMENT WHICH PROVIDES EMPLOYMENT OPPORTUNITIES AND DOES NOT CONFLICT WITH OTHER POLICIES OF THE PLAN. ON SITES CLOSE TO THE THAMES, THE COUNCIL WILL ENCOURAGE INDUSTRIAL AND COMMERCIAL DEVELOPMENTS WHICH INVOLVE USE OF THE RIVER.

POLICY TRN27 WILL APPLY TO THAT PART OF THE RAINHAM EMPLOYMENT AREA WHICH IS SERVED BY REFFY LANE UNTIL THE ACCESS PROBLEMS HAVE BEEN SATISFACTORILY RESOLVED.

The Havering emerging DPD (November 2006), core policy CP3 (Employment) states that a range of employment sites will be available to meet the needs of business and provide local employment opportunities. It states, "in the Beam Reach Business Park, prioritising advanced manufacturing uses and other modern industries in the B1 (b) (c) and B2 use classes which provide a similar quality and intensity of employment".

The Havering emerging DPD (November 2006), development control policy DC9 (Main Employment Areas) states that, "Planning permission will only be granted for B1 (b & c), B2 and B8 uses in the Rainham Employment Area, Harold Hill Industrial Estate and King George Close Estate Main Employment Areas. Advanced manufacturing uses (B1 (b) (c) and B2) will be prioritised within the Beam Reach Business Park together with other (B1 (b) (c) and B2) uses which provide a similar quality and intensity of employment and a high standard of design".

The reasoned justification cited in the DPD in relation to policy DC9 states that:

The Rainham Employment Area provides for the needs of all industrial businesses by offering a choice of small, medium and large premises and is considered to be a strategically and locally important area. Given its high environmental quality and location next to the Centre for Engineering and Manufacturing Excellence (CEME), Beam Reach Business Park is prioritised for advanced manufacturing and other modern industries. Other uses will be allowed within the Beam Reach Business Park where they provided

a similar quality and intensity of employment within a high quality development commensurate with the business park environment.

The London Riverside area is identified as an Opportunity Area in East London and a suitable location for innovation and high technology manufacturing within the London Plan (2004) and is within the Thames Gateway Growth Area identified in the Government's Sustainable Communities Plan. ¹The regeneration of London Riverside therefore has national and regional support. The London Plan states that the planning framework for the area should reflect the vision of the London Riverside Urban Strategy.

An Urban Strategy for London Riverside (July 2002) states that Beam Reach Business Park will provide 35 hectares for modern advanced manufacturing businesses, including strategic sites for inward investment, move-on accommodation from the Business Innovation Centre, and a suppliers' park for diesel engine components.

Havering Council intend to adopt a Supplementary Planning Document for London Riverside. It is anticipated to be issued for public consultation in April 2008.

The application states that in terms of permanent employment, this proposal offers – in the first instance – the guarantee of employment on the site at at least the level achieved in KICC's existing operations at Hackney Wick. The 75 paid full time permanent positions and 1,300 unpaid voluntary workers in part-time positions will be transferred to the Beam Reach site if planning permission is granted. The proposal does not include any new additional jobs other than an estimate of 76 full-time construction jobs over the proposed five year development stage (section 7.5.2. of the ES). Unpaid voluntary jobs are unlikely to bring any tangible economic activity to the area.

The type of jobs that are stated as being likely to be created include:

- Managerial positions
- Marketing positions
- Musicians
- Counsellors
- Accounts staff
- Administrators
- Teachers
- Cleaning and maintenance/
ground staff
- IT staff
- Events staff
- Gym Instructors
- Caterers
- Security

The Environmental Statement uses English Partnerships and the Regional Development Agencies Table of Employment Densities (July 2001) and an assumption that one job space equates to one full time equivalent (FTE) job to calculate that potential employment at the site may generate a total of 674 FTE.

The applicant presents a case that the amount of employment creation (both during construction and long term) would be comparable with estimates for preferred Class B employment use; availability of training opportunities and comparison with the local employment and skills bases is also presented in favour of the application and what it can offer to the local area.

¹ Communities Plan, Sustainable Communities Building for the Future, DCLG, 2004

The application proposal states that there is likely to be an increase in both paid and volunteer employment, in line with KICC's likely growth. It also states that it is not possible at this stage to predict the rate of growth nor the type of employment precisely, though KICC's committed expansion elsewhere in the UK suggests that there will be an associated increase in the need for administration and support for office and conference employment.

The local and regional development plans for this area seek to promote development proposals that enable existing and future local communities to benefit from the regeneration growth in this Opportunity Area; develop the skills and competitiveness of the local workforce; promote innovation, business development and retention; and assemble and improve the quality of the subject industrial site.

LTGDC officers are not satisfied that the development is sustainable in terms of employment regeneration in line with local and regional policy objectives. The 75 full time jobs that are proposed to be transferred from Hackney, are not newly created, and anticipated UK growth as contended by the Applicant offers no tangible comfort/assurance of the delivery of any new, paid, jobs that will benefit the local community at large. The creation of new jobs would not provide economic and social benefits in line with the requirements of PPS1.

Development opportunities should benefit and assist in regenerating local communities, equipping them with skills, access and support facilities that will allow them to benefit from job opportunities. The sole provision of construction jobs which would be applicable to any development of the site presents no tangible reduction in the gap between skilled workers and semi or unskilled workers, or stimulus of growth of long term employment at a range of skill levels in accordance with policy 3B.12. Seeking to improve the skills and employment opportunities for Londoners, policy 3B.12, states that the Mayor will: co-ordinate and provide the spatial context alongside the range of initiatives necessary to improve the employment opportunities for London and to remove barriers to employment; and ensure that opportunities provided by major new development are used to assist in skills action and the targeting of job opportunities to local communities.

The proposal does not therefore assist in regenerating local communities. This is for reasons including that the employment will not be new employment and hence this development is not employment creating.

The applicant contends that the proposal should be accepted as an exception to employment policy because it will bring forward an immediate employment benefit on a site were no alternative forms of development are programmed or predicted. They also state that, "in so far as there may be alternative employment-creating developments which could be accommodated on this site, there is a wide availability of land both in the immediate Beam Reach 5 area and in the wider local area to accommodate any such alternative development, whereby there should be no concern about the loss of employment potential arising from any employment policy objection"².

LTGDC officers do not accept this argument as justification that warrants the

² Planning Statement - page 107

acceptance of a proposal that is contrary to the provisions of the relevant existing and emerging Development Plan. If this approach is taken ultimately all exceptions are allowable. Further it suggests that other sites may be capable of accommodating KICC.

13.21 **Transport**

KICC's use of the site during both the temporary and permanent operational phases is likely to be travel intensive, giving rise to considerable impact in travel terms because of the very large numbers attracted to the venue. At capacity the site could accommodate approximately 10,500 people (8,000 main auditorium, 2,000 multi-use building, 500 chapel, plus office uses).

As required by policies 3C.2 of the London Plan, DC33 of Havering's emerging LDF and PPG13 the application is supported by a Transport Assessment (TA), prepared and revised by MVA Consultancy on behalf of KICC. It addresses all modes of transport and takes into account an Interim Travel Plan, which is proposed to mitigate the impacts of the development on the transport network and specifically to minimise the use of the private car. KICC intend that the travel plan will be operational from Phase 1.

LTGDC contracted the services of Halcrow Group Limited to review the Transport Aspects of the application. Halcrow provided a report in October 2007, which MVA Consultancy and TfL have both responded to.

The justification for the Travel Plan measures is based on the operation of the KICC site at Waterden Road; the home locations of KICC members; and the public transport connections to Barking. A map illustrating KICC church member home locations is provided at Appendix 4. The majority of KICC's 12000 membership is based in North East London, although it is widely distributed across the whole of London and beyond. The Planning Statement states that about 3,000 members are drawn from the RM postcode area, around the application site.

The site currently has a low public transport accessibility level (PTAL) of 1, on a scale of 1 to 6, where 1 is low and 6 is high. The lack of public transport provision in the area is of concern. It is recognised in the TA that although it is an aspiration to provide better public transport links to the area, it is unlikely that without intervention any specific bus service improvements will come forward to serve the development site of a scale to satisfy the need for non-car travel.

Public transport accessibility could be improved if a new station were to be built at Beam Reach on the London, Tilbury and Southend Rail line, and should phase 3 of the East London Transit (ELT) proceed. However, as neither of these projects is currently funded or programmed, KICC are proposing a series of private shuttle and mini buses to serve the site as part of the Travel Plan. KICC is not currently proposing measures or funding likely to accelerate either a new station or Phase 3 of the East London Transit (ELT).

Policy 3C.1 of the London Plan seeks to match and link new development with transport infrastructure; and stipulates that high trip generating development would only be supported at locations with both high levels of public transport accessibility

and capacity sufficient to meet the transport requirements of the development. Furthermore, in considering planning applications, PPG13 provides that Local Authorities should ensure that development comprising jobs, shopping, leisure and services offers a realistic choice of access by public transport, walking, and cycling. At present this site, whilst not falling within these headings but similar to (say) leisure, does not present such a choice.

PPS13 (27) provides that developers putting forward large development proposals (possibly incorporating a number of individual elements) which involve major generators of travel demand need to be flexible in terms of considering the potential for tailoring, reducing, or splitting projects so that they can be accommodated in the preferred locations in the development plan or other sites which are highly accessible by non car modes. Where a development comprising jobs, shopping, leisure and services is proposed outside the preferred locations identified in the development plan, the onus will be on the developer to demonstrate why it cannot fit into the preferred locations, and to illustrate how the accessibility of the proposed development by all modes compares with other possible sites. Officers consider – in light of Policy DC26 (see below) – that this approach applies equally to KICC as a community facility. Therefore these tests apply to this development.

Policy DC26 of Havering’s emerging LDF provides that, “Planning permission for new community facilities will only be granted where they are accessible by a range of transport modes including walking and cycling and to those groups who rely on public transport”. Again the site does not meet these criteria.

Policy CP9 of Havering’s emerging LDF also seeks to reduce the need to travel by: co-locating cultural and community uses in places with good public transport accessibility; ensuring that new development reinforces the town centre hierarchy; and ensuring that there is a range of local employment opportunities, that local people are suitable skilled to compete for these, and maximising the employment of local people in new development. This is further supported by policy CP8. The development site is not in a town centre location, hence, this use cannot be said to reinforce the town centre hierarchy.

Pedestrian & Bus - The inaccessibility of the site is proposed to be address in terms of walking. It is intended that a continuous footway connecting the site to Marsh Way, for onward walking trips to the north or south or to access the bus stops on Marsh Way itself will be provided. Policy 3A.15 protects and enhances social infrastructure and community facilities. Appropriate facilities should be accessible by walking and by public transport.

LTGDC officers are currently considering a development proposal on the Foundry Site (western part of the subject Business Park), by EWS Railways Limited for a temporary road to rail freight transshipment facility in association with the construction and subsequent operation of the Olympic Park. That site shares the same site entrance as the subject development proposal and would be served by large numbers of lorries, including large freight carrying vehicles. The proposal site is located in the easternmost corner of an industrial park, with no through routes to the north, east or south. The pedestrian environment for the users of the proposed development, whether KICC related or otherwise, is likely to be poor, with particular regard to air quality and safety.

Policy 3C.20 of the London Plan places an emphasis on the need to provide safe, convenient, accessible and direct pedestrian access from new developments to public transport nodes and key land uses, taking account of the need to connect people to jobs, to town centres and to schools. Pedestrian access/site permeability would be improved if the link to the north of the site via the bridge that traverses the rail lines Manor Way were open.

Responsibility for pedestrian and cycle improvements to / from the site lies with the London Development Agency as land owner. TfL / LTGDC seek clarification from the LDA as to whether the link to the north of the site via Manor Way is to be reopened as part of the area Masterplan, increasing the permeability of the site for pedestrians.

The Transport Assessment states that 10% of trips would be by walk, cycle and London bus modes, but that it is unlikely that significant amounts of trips will be by walking or cycling. Conditions for walking and cycling are poor within and around the site. Therefore, the bulk of the 10% is expected to be by London bus services.

Accordingly measures are proposed to enhance accessibility by bus. The closest bus stop is on Marsh Way and served by the 174 route which runs every 8 minutes between Harold Hill and Marsh Way, via Romford. It provides direct links to Dagenham Heathway and Romford train stations. There is no bus provision on Marsh Way on Sunday and a bus service would have limited capacity even if extended. A bus service runs at intervals throughout the day, whereas an event-focused use such as this will have times of peak demand.

Transport for London (TfL) support plans to implement northbound and southbound bus lanes on Marsh Way as part of a section 278 signal scheme at the Marsh Way/A13 junction.

The TfL Bus Priority and Infrastructure Development teams have assessed the bus stops on Marsh Way (BP4068 and BP4069) and come to the conclusion that the bus stop clearways are in a poor condition. A financial contribution of £5000 towards the resurfacing of the bus clearways is sought.

Shuttle and Mini-bus services – The Interim Travel Plan proposes shuttle and mini-bus services as an alternative to driving to the site on Sundays. This would also reduce the number of pedestrians walking across the Business Park.

The mini-bus service will comprise of fifty 15 seat minibuses that:

- follow route to the site directly from specific pick up points such as housing estates or other public transport nodes such as Ilford; and
- follow routes that members pre-book, similar to “dial-a-ride”; and
- follow fixed routes through the local community.

The shuttle bus service is proposed to be provided by KICC from Abbey Road in Barking. The location would be intended to provide a link from Barking station. This in turn implies that KICC’s attendees would use rail services to reach this point.

The Interim Travel Plan proposes that existing parking bays on Abbey Road, opposite Abbey retail park, would be used to provide a pick-up and drop-off point on Sundays. A fleet of twenty, 75 seat double deck buses are proposed to run every 3 minutes, commencing 90 minutes prior to a service or event taking place. The planned capacity of the shuttle bus service will be up to 4500 passengers. It is expected that approximately 4000 people will be moved from the site to Barking in the 90 minutes following the end of each Sunday service. This equates to an average of 44 pedestrians per minute. No information has been provided to show that Barking station and / or services to Barking Station could cope with the increased passenger numbers.

In considering this application as a consultee, the London Borough of Barking and Dagenham's (LBBB) Development Control Board considered the following: i) the effect of the bus movements on the Borough's highway network; and ii) the impact of pedestrian routes through the town centre. Members considered that the development of Beam Reach site in itself would not be harmful to LBBB roads. However, concerns were raised regarding the impact of the proposed transport arrangements on Barking town centre and the borough roads, particularly Gascoigne Road, if private buses find alternative route through Barking town centre to reach the A13, especially Ripple Road. LBBB consider that these issues would significantly impact adversely upon residents on the affected roads especially during early morning hours. LBBB are also concerned about the possible congregation of large groups of passengers awaiting transportation.

The Transport Plan states that the buses will follow an agreed route except in exceptional circumstances and will only pick up passengers at the agreed location in Barking. The TA states that management obligations with the LDA will ensure that KICC will ensure that adequate control is exerted over the shuttle and minibus operation.

For Members using the shuttle bus service, the following is proposed:

- Commence at Barking Station;
- 10 minute walk to Abbey Road via the pedestrianised East Street route;
- Board KICC double deck shuttle bus at Abbey Road (3 minute loading time allowed for each bus);
- 12 minute bus journey to the site.
- Alight at the development site (3 minute unloading/disembark time).
- 12 minute bus journey back to Barking.

The proposed pedestrian route from Barking Station to the shuttle bus pick-up point on Abbey Road is illustrated at Appendix 5a. The proposed route of the Shuttle Bus Service is illustrated at Appendix 5b.

A maximum of six buses will be allowed to wait at the nominated stops at Barking and on the development site. The twenty buses will therefore need to 'lay-over' elsewhere when not in use. The applicant has advised that KICC will ensure that adequate control is exerted over the shuttle and mini-bus operations. Only the number of vehicles that there is space for on the site at any one time is to be parked there. Other vehicles would have to be parked off the site and called on once there is space for them. It has been suggested that CEME would provide a suitable

location for bus lay-over. The lay-over of buses on Consul Way and other estate roads within Beam Reach 5 is to be avoided because of the need for 24 hour a day access by the other site occupiers.

It is recognised that the phasing period will mean that there will be a long period (as much as 3 years) of sub-peak demand in which the shuttle bus arrangements can be refined. Further, if it is found that more buses than planned are needed to carry people to the site before and after services, a larger fleet of vehicles could provide an intense service for the peaks of demand.

LTGDC officers query the proposed use of CEME as a bus stand for the shuttle bus 'lay-over' periods. The applicant states that "KICC is in continuous discussions with CEME about the principle of using their car park". CEME have advised that discussions are yet to commence.

With regard to the use of CEME as a bus stand for the shuttle buses (and potentially for overspill car parking), TfL has advised that London Buses would be concerned if this affected the operation of the 174 bus route, which presently stands/terminates there. MVA Consultancy has been requested to provide additional information on the CEME proposals, including agreement from CEME regarding access arrangements.

LTGDC Officers have visited CEME, which has 530 car parking spaces (incl. 11 for disabled users), subdivided into five main areas as follows:

- 1) An area for the sole use of the London Borough of Havering, who occupy the western end of the CEME building. This area is only accessible through the use of an access card at the entry barrier;
- 2) The main car park, which is for Ford Apprentices/staff, visitors and non contract suppliers;
- 3) The Business Incubator Centre (BIC) car park, which when full, overflows into the main car park;
- 4) The East Car Park for CEME staff / paid contractors / Thames Gateway College students and staff; and
- 5) The Service Car Park, which is for the use of The Outsource Training Company (TOTC)

Buses can not physically fit into any of the car parks, due to the layout and electronic barrier system. The only area where a bus could fit would be on one of the two 174 bus stands. The approach road to the car parks / bus stands is private and marked with double yellow lines on both sides. CEME intend to make a small percentage of parking bays in the East Car Park available to patrons of a proposed new hotel that is to be built on the adjacent site. It is considered that CEME would not be available for bus lay over.

LTGDC Officers have walked from Barking Station to the proposed shuttle bus pick up point on Abbey Road where there are presently 12 on-street parking bays marked out that are restricted by a Pay and Display system from Monday to Saturday – 8:30am to 5:30pm, limited to a maximum 1 hour stay. On Sundays parking is currently unrestricted. Therefore, these bays would require suspension on Sundays. The availability of these bays on other days and for other periods has

not been considered in the TA. It is considered for many people that the walking time from Barking to the Abbey Road bus pick up point is in excess of 10 minutes. The amended Interim Travel Plan (dated January 2008) states that a maximum of six buses shall be allowed to wait at the nominated stops at Barking. However, six double deck buses could not fit in the 12 car parking bays. Therefore the location of layover areas for the contracted bus company would need to be agreed with TfL, LTGDC and Local Authorities.

Currently third parties, quite legitimately, may park in the Abbey Road parking bays on a Sunday. Therefore KICC can not presently guarantee the provision of a bus stand in Barking for the shuttle bus service. This would require a Traffic Regulation Order. Without this, buses would not benefit from a bus stand, but may well have to wait in the main carriageway. During the relevant 90 minute period prior to a service or event taking place, this carriageway obstruction could happen 50 times. There is no certainty that the buses will be able to park as proposed or that there will be anywhere at all for the buses to park. This is considered to be a fundamental issue, which undermines the operation of the shuttle bus service.

TfL have advised that in order to ensure that the shuttle bus operations do not interfere with local bus operations, or contravene existing parking restrictions, KICC would need to liaise with the London Borough of Barking and Dagenham (being the local highway authority) seeking a Traffic Regulation Order permitting buses to stand on Abbey Road. An LBBD Officer has stated that it is highly unlikely that such an Order will be made and that potentially the Borough has the option to issue an Order preventing the shuttle buses from parking on the bays as proposed.

TfL has recommended that it would be prudent to organise a test run to identify any problems before operations began, as well as an audit of pick-up/drop off arrangements at either end of the proposed service.

TfL has also raised concern that the shuttle bus would only operate on Sundays and not weekdays. They have suggested that any section 106 agreement should include a provision that shuttle bus services would be provided on weekdays if required. This would have implications regarding the Abbey Road stand/pick-up and CEME bus stands.

This type of arrangement i.e. a Traffic Regulation Order, may be the subject of a Grampian style planning condition, leaving the applicant to conclude matters with LBBD. Such a condition should only be used in certain circumstances. Where there is no reasonable prospect of the condition being fulfilled it should not be used as a device to allow the grant of planning permission. LBBD officer comments have led LTGDC officers to consider that there is no such prospect here.

Travel by Car and Car Parking The application includes a permanent multi-storey car park of 1,200 spaces (4% available for disabled users to be located at ground level), 20 motorcycle spaces and 84 secure bicycle spaces, separate parking for KICC's mini-buses and access roads into and within the site, including bus pick-up and drop-off points. During temporary phases 2 and 3, 395 and 445 car parking spaces would available respectively.

The application states that car parking spaces will be designed to meet the minimum sizes and design as recommended by the Centre for Accessible Environments, so that they will be convenient for disabled people. The main access core in the car park will have lifts to allow access to all levels.

Visitors will be discouraged from travelling to the site by car and members will be advised to use the shuttle and mini bus services. A system of permits will operate to gain access to the site car park, which will tie permit holders into lift sharing. Single occupancy vehicles will not be allowed on the site. No details have been provided explaining how the permit system will be enforced during all hours.

The Interim Travel Plan states that the use of the 1200 space car park on the site will be restricted to high occupancy users i.e. at least 2 or 3 persons per vehicle. It is contended that if an average occupancy of 3 can be achieved, up to approximately 3500 people could be transported this way. It is unclear how car parking will be controlled if KICC members arrive at the on-site car park without a permit; or, if single occupancy vehicles arrive with permits. TfL have raised concerns about the use of CEME or other local sites for 'temporary' car parking; assumptions in the TA regarding trip generation are based on limited parking provision limiting trips by car. This should not be undermined by the provision or use of off-site parking spaces such as at CEME or in central Barking. TfL have emphasised that it must be ensured that any overspill parking is used appropriately and temporarily, and does not interfere with sustainable travel principles. They have requested detailed information on the means with which this can be done, including how and when overspill parking will be phased out.

The Interim Travel Plan does not ensure that the level of car parking does not give rise to on-street car parking problems which may impact on the safety and quality of the environment. It must be ensured that any overspill parking does not interfere with sustainable travel principles or undermine the use of more sustainable non-car modes. The application states that, "If required, this parking will be contained in pre-arranged areas, with the agreement of the respective occupiers and landowners". LTGDC officers find that the application does not seek to reduce associated parking, but rather seeks to accommodate associated parking that can not be accommodated on site in the surrounding area by renting the use of nearby sites to use as over-spill car parking areas to the detriment of residents and users of adjacent facilities / uses and homes. This is discordant with the objectives of policies DC33 of Havering's emerging LDF and 3C.22 of the London Plan. There is a lack of information on how overspill parking will be phased out.

Cycle and Motorcycle Access & Parking Policy 3C.21 of the London Plan and DC35 of Havering's emerging LDF seek improved conditions for cycling in accordance with the Mayor's Transport Strategy and TfL's Cycling Action Plan and Cycle Parking Standards. TfL's cycle parking standards include requirements for assembly and leisure uses of one space per ten staff, plus one space per peak period visitor.

During phase 2 (temporary auditorium, temporary car park) 12 motorcycle and 50 pedal cycle parking spaces are proposed;
During phase 3 (permanent auditorium, temporary car park) 20 motorcycle and 84 pedal cycle parking spaces are proposed;

From phase 4 onwards (permanent auditorium, permanent car park) 20 motorcycle and 84 pedal cycle parking spaces are proposed.

A designated bicycle access path adjacent to the car park ramp is proposed to provide protection for cyclists from vehicles.

Shower and changing facilities within the multi-use building will be managed by KICC so that they may be available for the use of cyclists.

TfL have stated that space to accommodate additional future cycle parking should be identified. This could be addressed through the monitoring of the Travel Plan and an obligation under section 106.

Vehicular Access The site is accessible from Marsh Way via Consul Avenue. Having reached the proposed new roundabout in front of the site the traffic is diverted. Furthest North is the entrance and exit for cars, into and out of the car park, followed by the mini-bus and service vehicle exit.

The London Plan seeks sustainable development through many policies including 2A.1 and 2A.2, which seek to maximise access by public transport – ensuring that development occurs in locations that are currently, or are planned to be, accessible by public transport, walking and cycling; and ensuring that development occurs in locations that are accessible to town centres, employment, housing, shops and services. Policy 3C.1 (Integrating transport and development) specifically seeks to encourage patterns and forms of development that reduce the need to travel, especially by car and, in general, supporting high trip generating development only at locations with high levels of public transport accessibility and capacity sufficient to meet the needs of the development. Policy 3C.16 (Tackling congestion and reducing traffic) also aims to reduce road congestion and 3C.22 (Parking strategy) to minimise parking areas.

Improvement works, promoted by the LDA, including signalisation are scheduled to be carried out at the junction of the A13, Marsh Way and the access of Beam Reach Business Park 5. The works are tentatively programmed to be operational by July 2008. The LDA's proposal has taken KICC into account and capacity would therefore exist if the development proposed is built.

A taxi drop off area been designated in between the main vehicular access gate and the pedestrian gate.

Rail There are no London Underground services in the vicinity of the Application site. The Hammersmith and City and District Lines and overground (Gospel Oak to Barking) serve Barking station along with C2C services, located approximately 7 km from the Application site. Dagenham Heathway underground station is nearer but again not that close or readily accessible.

The nearest railway stations are Dagenham Dock and Rainham Stations which are over 2 kilometres away. Even then they are only served by 2 trains per hour which run between London Fenchurch Street and Southend.

TfL have advised that Sunday services on the London, Tilbury, Southend railway

line that could serve the application site are hourly, and the proposed development is potentially within walking distance of the railway. However, at present no station exists to serve this particular catchment but one is being considered at Beam Park, which could serve the site. Currently there is no commitment to provide or fund such a station by any body. The London Riverside New Stations Report, prepared by Atkins on behalf of the LTGDC was completed in January 2008 and is presently being considered by stakeholders. It recommends that a potential case for a new rail station is evident in outline. Assuming only one rail station were to be developed, its location at Beam Park would maximise regeneration benefits to the Thames Gateway area.

Should a station be built at Beam Park, it would be likely to be used by the proposed development and section 106 funding should be committed by this Development. However, even if funding is identified relatively quickly and there are no major objections, this could not probably be achieved for 7 years. Even if provided, a new station would assist the situation, that would not overcome the policy issues as discussed elsewhere in this report, and in any event there is still uncertainty about the delivery of such a station.

The Sunday services on the Gospel Oak – Barking train route have been improved. It is understood that further improvements in weekday frequency and hours of operation are planned following the delivery of new trains (2009/10) but it is not known what changes, if any, are planned for the Sunday service. The December 2007 timetable improves the availability of this route for morning arrivals and evening departures by Sunday attendees.

LTGDC Officers have considered the Transport Assessment submitted in support of the planning application and have concluded that the size of the development will have a significant traffic impact. It will be travel intensive and unsustainable in terms of transport generation even with the implementation, monitoring and revision of a robust Travel Plan to mitigate impacts and reduce car use. It has by no means been demonstrated that such a Travel Plan can be realistically delivered and maintained.

The application details accept that the success of the development will depend on two supporting elements of the Travel Plan, these being the private shuttle bus and mini-bus services to be provided for members and the management of car parking on the site and surrounding area.

The Travel Plan (dated July 2007) is recognised as being interim and subject to further development. It identifies a range of management and physical measures to encourage use of KICC's shuttle and mini buses, public transport, walking and cycling and reduced car use, but does not sufficiently achieve this.

Officers are concerned that: the private shuttle bus service relies upon the use of 12 on-street car parking bays on Abbey Road to operate and that those parking bays could be occupied by any other third parties on Sundays; no measures are available to KICC to prevent this; no specific sites have been identified to absorb overspill car parking once the onsite car park is full; and the use of CEME for bus lay over/standing, or, car parking has not been secured. These matters are considered to undermine the likelihood of the Travel Plan succeeding to a material

degree.

LTGDC officers are concerned that the private shuttle bus service will only be available on Sunday. It has been explained that Bible study and worship sessions are expected to be held on Wednesday evenings with an expected attendance of circa. 2000 people. On this basis, it is asserted that there will be no need for the shuttle bus service from Barking. The car park could hold 2400 people even if a lower than expected car occupancy of 2 is achieved. It has been stated that the objective of the management of these events would be to avoid traffic movements to the site clashing with the evening peak period. However measures have not been set out that explain how a non-car-borne access is encouraged by this approach. Indeed, it relies on the private car.

LTGDC officers consider that the cumulative traffic impacts on Wednesday evenings when West Ham United Football Club have fixtures will exacerbate traffic congestion in the area. No information has been provided regarding the use of the site on other days. Event management details are critical to the feasibility of the proposed development and any section 106 agreement would need to include a provision that shuttle bus services will be provided on weekdays if required.

LTGDC officers consider that the use of temporary, satellite car parks would undermine the transport strategy that the TA and associated Travel Plan are trying to achieve. Arrivals by cars should be strongly discouraged and high parking charges should be applied to the identified parking areas outside the site. The applicant has not demonstrated what action would be taken if targets are not met and objectives not achieved, what improvement will take place and who will be responsible for this and over what time-scales. Penalties would need to be issued for vehicles illegally parked on the surrounding streets. The areas surrounding the site would need to be continuously monitored and progresses / methods to mitigate local off-site parking should be reported within the Travel Plan.

Furthermore, there is a lack of clarity / detail as to travel arrangements for non-KICC users of the main auditorium. Whilst such events are stated by the applicant to take place no more than once a month, these would have a major impact if not controlled properly. In sustainability terms this would mean that if additional use by others did not take place frequently, the development would not be used intensively.

13.22 **Sequential Test and Site Search**

KICC are clearly having great difficulty in finding an appropriate site from which to operate at its desired scale. A site search comprising North and East London was carried out, commencing in 2002. In 2003, the LDA instructed EDAW to carry out a full review of sites within the Lower Lea Valley that might be suitable for KICC's requirements. No available sites emerged through this process. Further to that a number of other sites have been identified but were rejected due to their unsuitability or unavailability. These were excluded from the assessment for the following reasons:

- *Limmo Site* ~ not suitable because it was being used as a temporary construction depot for the DLR extension and in the long-term, would not comprise sufficient

- developable area, given the proposed location of a Cross Rail ventilation shaft;
- *West Ham Parcellforce Site* ~ inadequate access arrangements. Some of the site was set aside for a bus depot and then the LDA confirmed that the remainder of the site would be re-masterplanned and would not be suitable nor available for KICC;
- *Warton House, Stratford* ~ Sold to another party;
- *Site at Alfreds Way, Barking* ~ Sold to another party;
- *Unit J Prologis Park, Bow* ~ Sold to another party;
- *Site at River Road, Barking* ~ rejected due to the requirement for site remediation which could not be carried out in the desired timescale. Also considered to be too small;
- *UEL Campus, Barking* ~ Sold to another party;
- *Alexandra Palace, N22* ~ Not available to KICC;
- *Webbs Industrial Estate, E17* ~ Sold to another party;
- *Bank of England Social Club, Debden* ~ Sold to another party;
- *HSPT Site, E17* ~ Sold to another party;
- *Barnet College, EN5* ~ Considered to be too inaccessible for KICC members and would be unsuitable in terms of significant access issues;
- *Fore Street, Edmonton* ~ Too small for KICC's use; and
- *1010 Great West Road, Brentford* – Too far from the majority of KICC members.

In addition to the above, the 02, ExCeL Centre and Millwall Football Club were also considered by KICC. None of these were identified as being available or suitable for KICC's use and were thereby excluded from the assessment.

The applicant does not accept that the sequential test applies to all of KICC's proposed uses. However, KICC do state that this test would nonetheless be satisfied as no other alternatives (to which the test could be applied) exist.

PPS6 does not refer to places of worship. Therefore LTGDC Officers have taken appropriate account of London Plan Policies 2A.5, 2A.6, 3A.15, 3C.1 and 3C.1 which seek to locate community facilities within established town centres, at locations with high levels of public transport accessibility and capacity, and within easy reach by walking and public transport. Havering's emerging LDF applies a sequential approach to retail and service development (DC15), culture and leisure (DC19), and community facilities (DC26), which is consistent with national and regional planning policy. Officers consider that this particular use is analogous to a use subject to PPS6 in any case.

Havering's officer report queries the applicants contention that all of the facilities proposed need to be located on one site. KICC contend that it is the totality of the experience which members expect and which makes it important for the services and facilities they offer to be grouped together and that potential disbenefits would occur if forced to disaggregate.

PPS6 requires developments to be disaggregated if possible to determine whether a more central location would be appropriate. The applicant agrees that the requirement to consider the disaggregation of a use is a component of the sequential assessment of sites or town centre uses. However, the applicant contends that Class D1 Places of Worship are not a "town centre use" as defined by PPS6 and thereby there is no requirement to sequentially assess sites for this

use, nor therefore, to consider the scope for disaggregation of that use into smaller components. The applicant accepts that some of the proposed uses that are secondary or ancillary to the primary function of their proposed development (being a place of worship) would in isolation, be PPS6 Town Centre uses. These uses are not, however, being proposed individually but as part of a larger proposal.

The applicant's site search did not rule out the disaggregation of KICC's primary and secondary uses into separate parts across different sites. However, the site search process did not identify any suitable or available site that could accommodate KICC's auditorium on its own (other than the application site) thereby, stated the applicant, ruling out the possibility of then considering other sites for the other uses. The applicant contends that disaggregation of KICC's use would not offer the benefits associated with a large-scale development. The applicant states that this would, at best, inconvenience KICC, or seek an unjustified change to their operating practices, which would fail to deliver positive planning benefits.

LTGDC officers have considered the view of the applicant and the provisions of PPS6 and the policies listed above, concluding in line with 3.15 of PPS 6 that there is a need for KICC to be more flexible about its proposed business model in terms of:

- the scale of their development;
- the format of their development;
- car parking provision; and
- the scope for disaggregation.

Notwithstanding the representations on behalf of the applicants it is not accepted that the proposed land use is acceptable on the development site (as discussed at 13.16 of this report).

14 OFFER OF SECTION 106 AGREEMENT

- 14.1 The applicant has made certain offers of planning obligations in relation to the application. However, the formal terms are yet to be supplied. A separate report will be provided as an addendum to this report if the terms are received before Members consider this report.

15 CONCLUSION AND REASONS FOR REFUSAL

- 15.1 This application has been carefully assessed against a range of national, regional and local policies which individually can be argued to be met. Others support a refusal of permission. The important role for LTDGC as the decision maker is to identify policies that go to the principle of the development and those with which compliance is needed or desirable if that principle is established. Some policies will be of greater weight or of greater consequence in terms of the interest that they promote or protect.

- 15.2 There is also an argument put forward by the applicants that, because of the

uniqueness of their situation, an exception should be made to those policies which support refusal. Underpinning the Applicant's case is a Transport Assessment and associated Traffic Plan and whether confidence can be placed in the proposals and safeguards set out in those two documents is also key to reaching a conclusion.

- 15.3 The status of the site and the overall Beam Reach 5 area as safeguarded employment land has been repeatedly restated in a range of policies over the years, including the Inspector's report in October 2007 into Havering's Core Strategy. This most recent document is also important because it identified industrial areas which could be released in line with local and GLA policy thus placing additional significance on the land retained for industrial activities at this location. The argument from the Applicant that the current existence of significant areas of vacant land allocated for industrial purposes is a factor in favour of the application is not accepted. The masterplan for the site is currently being revised along with a better appreciation of what types of activities can be supported on the individual plots and the loss of over 4 hectares to the KICC / LDA proposals in land use terms is regarded as being clearly contrary to the relevant policies.
- 15.4 Havering and GLA policies relating to places of worship and community facilities, including equality and diversity issues, set out various criteria for such activities – a key one being accessibility to public transport and easy reach for walking. Furthermore, it must be recognised that the KICC proposal raises particular issues in this regard because of the scale of the activities. Many of the policies relate to facilities serving a local community and, whilst KICC have provided information as to how many of their congregants live in Havering and Barking and Dagenham the majority live much further away and ease of accessibility is a critical element.
- 15.5 The Transport Assessment (TA) and the Travel Plan (TP) contain various key proposals and assumptions that have already been analysed in this report but which merit summarising. It should also be noted that there are no details of how movements to events in the auditorium for non KICC events will be dealt with. For Sundays it is proposed that movements to and from the site will be split approximately equally between people arriving by car and by a shuttle bus service from Abbey Road in Barking with a small percentage being brought by minibus. Whilst recognising that KICC had considerable success in ensuring car sharing to their previous site and believe that pattern can be replicated for the proposed site, there are still concerns as to the enforceability of such an approach and what happens if cars with less than the approved number of occupants are turned away and where they then go. The movement by buses is ambitious and is predicated on a parking and pick-up area in Abbey Road always being available for buses to park and no other vehicles parking there over what is a 5 to 6 hour period; and the ability to lay-over the buses close to the site for several hours between the dropping off and collection periods. Parking in Abbey Road can not be guaranteed and CEME. Parking on roads around the site is not an option for the 'in-between' period.
- 15.6 In terms of the Environmental Statement (ES) most of the points are not contentious. However two points need to be highlighted. The first, under Socioeconomic Impacts, refers to there being substantial benefit in relation to community benefits. Whilst this may very well be true in terms of the KICC

community, it has not been accepted in respect of the local and wider general community – at least in terms of why this particular development in this location secures such benefits. Secondly, in analysing the strategy in the Transport section, the ES recognises that the success of the strategy depends on the shuttle bus and car parking management working as set out in the relevant documents.

15.7 It is accepted that the design of the buildings and associated sustainability elements are of a high standard.

15.8 KICC / LDA believe that there is a good case for permitting their application and that the proposals if implemented would provide significant benefits to the area. They believe that issues relating to the movement of people by car and public transport can be properly managed. However, it is not considered that significant benefits will accrue to the area other than for KICC members and the community it is directly involved with. More importantly the combination of the land use policies for the site along with clear shortcomings in the TA and TP provide clear and material justifications for refusal, as summarised above in this section of the report. Officers consider that contraventions of land-use policies and unsustainable transport practices shall be given great weight notwithstanding any other benefits or compliance with other policies. Therefore the Committee is recommended to refuse planning permission for the reasons set out below.

15.9 Reasons for Refusal

1. The proposed development comprising of primary uses falling into the D1 and D2 Use Classes with additional B1 (a) and ancillary uses is of more than local significance presenting an inappropriate land use that would result in the net loss of industrial employment land capacity in Beam Reach Business Park 5. It would prejudice and undermine the effectiveness of the London Borough of Havering's emerging Core Strategy and Development Control Policies Development Plan Document and of the Further Alterations to the London Plan as a Strategic Employment Location (SEL). It is contrary to policies EMP1 and EMP5 of the London Borough of Havering UDP (adopted March 1993); policies CP3 and DC9 of Havering's emerging Core Strategy and Development Control Policies Development Plan Document (dated November 2006); policies 2A.7, 3B.5, 3B.12 and 5C.1 of the London Plan (adopted February 2004); the provisions of the Urban Strategy for London Riverside (July 2002); and the provisions of the London Plan Sub-Regional Development Framework for East London, which prioritise Beam Reach Business Park for advanced manufacturing uses and other B1 (b) (c) and B2 uses.
2. The proposal is unsustainable in terms of transport regeneration by virtue of being high trip generating and travel intensive, resulting in an unacceptable increase in noise, pollution, congestion, and on-street car parking. With a public transport accessibility (PTAL) level of 1, the available public transport services are inadequate for the proposed use in this location, having regard to the large numbers of people that are expected to travel to and from the site for KICC or non-KICC related activities. The findings of the Transport Assessment and revised Travel Plan are not persuasive regarding the operation of the shuttle bus service or the

management and enforcement of car parking issues that are likely to arise in the locality as a direct result of the proposed development. This is contrary to policies TRN2, TRN22 of the London Borough of Havering UDP (adopted March 1993); 2A.1, 2A.2, 3C.1, 3C.2, 3C.16, 3C.20, 3C.22 of the London Plan (adopted February 2004); policies CP8, CP9, DC26, DC33 of Havering's emerging Core Strategy and Development Control Policies Development Plan Document (dated November 2006); and Government guidance, notably PPS13.

3. The location of the proposed D1 and D2 Uses is unacceptable by virtue of having a poor public transport accessibility level, and therefore being contrary to policies CP8 of Havering's emerging Core Strategy and Development Control Policies Development Plan Document (dated November 2006) and 3A.15 of the London Plan (adopted February 2004) which seek to locate community uses in areas within easy reach by walking and public transport of the population that use them.

16 RECOMMENDATION

- 16.1 For the reasons stated above and having regard to the development plan, material considerations and this officer report, Members are recommended to **refuse** to grant planning permission for the proposed development.

Reference documents:

- Planning Application Documents (including supplementary transport information, correspondence; and amended drawings);
- Town and Country Planning (Use Classes) Order 2005
- Town and Country Planning (Mayor of London) Order 2000
- Town and Country Planning Act 1990 (as amended)
- Town and Country Planning (Development Plans and Consultation) (Departures) Directions 1999.
- Department of the Environment, Transport and the Regions Circular 07/99
- Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999.
- The London Plan Spatial Development Strategy for Greater London dated February 2004.
- The London Plan Draft Supplementary Planning Guidance; Industrial Capacity dated October 2007.
- The London Plan Supplementary Planning Guidance; Planning for Equality and Diversity in London dated October 2007.
- An Urban Strategy For London Riverside, July 2002
- The Havering Strategic Flood Risk Assessment published November 2007
- Planning System: General Principles, January 2005

CASE OFFICERS: Peter Minoletti, Planning Development Manager
Amanda Reid, Planning Development Officer

Appendix 1: Site Location Plan

Appendix 2: Illustrative proposed Site Layout Plan

Appendix 3: Proposed Elevations

Appendix 4: Church Member Home Locations (2006)

Appendix 5a: Aerial image showing the proposed pedestrian route from Barking Station to the shuttle bus pick-up point on Abbey Road.

Appendix 5b: Map showing the proposed route of the shuttle bus service.
