

PRIVATE BILL OFFICE
04 APR 2011
HOUSE OF LORDS

IN PARLIAMENT

HOUSE OF LORDS

SESSION 2010-11

Legislative Reform (Epping Forest) Order 2011

PETITION

AGAINST

THE ORDER – PRAYING TO BE HEARD BY COUNSEL .

To the Right Honourable the Lords Spiritual and Temporal of the United Kingdom of Great Britain and Northern Ireland in Parliament assembled:

THE MOST HUMBLE PETITION

- OF-

THE LONDON BOROUGH OF NEWHAM

SHEWETH as follows:

1. The Secretary of State for the Home Department has made an Order (hereinafter referred to as "the Order") intituled Legislative Reform (Epping Forest) Order 2011 expressed to be made in exercise of the powers conferred on her by section 1 of the Legislative and Regulatory Reform Act 2006 (1).

2. The Order is one which would, but for the provisions of section 1 of the Legislative and Regulatory Reform Act 2006 (1) require to be enacted by a private or hybrid bill and it is a hybrid instrument within the meaning of Standing Order 216 of the Standing Orders relating to Private Business of your Right Honourable House.

3. In accordance with the Standing Orders and practice of your Right Honourable House your Petitioners would have been entitled to petition against a Private or Hybrid bill containing provisions such as those contained in the Order.

Your Petitioners allege that they are injuriously affected by the order and they object thereto for the reasons, amongst others, hereinafter appearing.

The instrument

5. The Order will enable the Metropolitan Police to build a temporary muster station on land in Epping Forest (Wanstead Flats) and use it for the Olympic and Paralympic Games.

Your Petitioner

6. Your Petitioners are the Borough Council constituted under the Local Government Act 1972 for the area known as Newham.

7. YOUR Petitioners are the local authority which adjoins the site of the temporary muster station and which the Order may therefore directly and specially (adversely) affect.

Your Petitioner's concerns

8. YOUR Petitioners acknowledge the importance of the temporary muster station to the functioning of the Olympic Games and is concerned that the station will be a potential terrorist target and poses a security risk for local residents of the site.

9. YOUR Petitioners object in principle to the development of Wanstead Flats even for the temporary period proposed. It is concerned there will be a significant loss of amenity for local people by limiting access to Wanstead Flats during the temporary period proposed.

10. YOUR Petitioners consider that the open space at Wanstead Flats which is designated as Green Belt and a Green Corridor is an inappropriate location for the temporary muster station, and it has not been demonstrated that this is the only suitable site.

11. YOUR Petitioners are concerned that the temporary muster station will set a precedent for other potential developments on Wanstead Flats.

12. YOUR Petitioners are concerned that because of the proximity of the temporary muster station to residential properties within the area of Newham that the residents of these properties will suffer unreasonable nuisance and disturbance from the temporary muster station. Inadequate noise assessments have been carried out to show the noise harm that will be caused.

13. YOUR Petitioners are further concerned that the full impacts on transportation and highway safety in the vicinity of the muster station have not been satisfactorily addressed.

14. For the above reasons Your Petitioners submit that the Order should not be affirmed.

15. YOUR Petitioners further submit that:

- a. It has substantial grounds of complaint against the order;
- b. the matters it complains of have not been dealt with adequately or at all;
- c. there has been no previous opportunity of having the matters complained of inquired into;
- d. having regard to all the circumstances there is a strong case for a detailed inquiry into the Order by a Select Committee pursuant to Standing Order 216 with particular reference to the matters complained of.

YOUR PETITIONER(S) therefore most humbly pray(s) to Your Right Honourable House that the Order may not be affirmed and that it may be heard themselves, their Counsel or their Agent before any Committee of your Right Honourable House to whom the Order may be referred against the Order, and in support of the allegations contained in this Petition or such other relief may be given to Your Petitioners in the premises as to Your Right Honourable House may deem meet.

AND YOUR PETITIONER(S) will ever pray, etc.

Jeremy Appleson, Deputy Head of Legal Services, London Borough of Newham,
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4 April 2011