

Whipps Cross Hospital Redevelopment
Barts Health NHS Trust

Environmental Statement Volume 2 - Appendix 8.7: Meeting Minutes with Natural England
Discretionary Advice Service
WXH-WSP-ZZ-XX-RP-Y-1082



Appendix 8-7

Minutes of Meetings with Natural England Discretionary Advice Service

Discretionary Advice Service Meeting – Whipps Cross 15.01.21 – Orbis Ecology in-house meeting notes (not approved or distributed - for internal reference)

Present in Teams meeting starting at 1pm on 15.01.21 - Please note meeting notes only start approx. 10 mins into the meeting

Orbis Ecology: Bryony Gillet - BG	Ryder–Masterplan Team: David McMahon: DM
Orbis Ecology: Oliver Chope – OC	WSP – Andy Talbot – AT
Orbis Ecology: Emma Frewin - EF	City of London Corporation (CoL) act as the Conservators of Epping Forest: Jeremy Dagley – JD
Natural England: Marc Turner - MT	City of London Corporation (CoL) act as the Conservators of Epping Forest: Tristan Vetta – TV
Natural England: Milena Petrovic – MP	

Acronym definitions

Air quality (AQ)	Site of Importance for Nature Conservation (SINC)
Annual Average Daily Traffic (AADT)	Site of Special Scientific Interest (SSSI)
City of London Corporation (CoL)	Special Areas of Conservation (SAC)
Ecological Impact Assessment (EIA)	Special Protections Areas (SPAs)
Epping Forest District Council (EFDC)	Strategic Access Management and Monitoring Strategy (SAMMS)
Habitats Regulation Assessment (HRA)	Suitable Alternative Natural Green Space (SANGS)
Joint Nature Conservation Committee (JNCC)	Sustainability Appraisal (SA)
Land Use Consultants (LUC)	Ultra-Low Emission Zone (ULEZ)
London Borough Waltham Forest (LBFW)	Zone of Influence (ZOI)
Natural England (NE)	

TRANSCRIPTION RE APPROPRIATE MITIGATION

JD – The Master Plan does not address the balance between Strategic Access Management and Monitoring Strategy (SAMMS) and Suitable Alternative Natural Green Space (SANGS) – need more alternative spaces more innovative thoughts needed. Recreational pressure – key point. eg. elsewhere Hatfield forest residential site changed the way in which people visit. Much more urban at Whipps Cross so will produce even more pressure on Recreation. Urbanization problems such a fly tipping and fires already an issue and will expect to increase.

OC - Lacking steering re SANGS and SAMMS - quantity, how big, how many. Especially SANGS – What is needed?

JD – SAMMS – assisted oversight group meeting 21.01.21. Hosted by Epping Forest District Council (EFDC). Bringing main parties together including governance. Reasons for gaps decisions have not been made. Have

put complex paper including extra costs, key issues perpetuity factor – will affect tariffs paid. Will talk about SANGS view later in meeting.

SANGS generic view better expressed by Statutory authority.

MT – Epping Forest next in line a number of Strategic Solutions – SANGS principle broadly accepted and great weight given to 8 hectare per 1000 people in standard heathland area. Half of Epping Forest Zone of Influence (ZOI) - London is a completely different beast.

Waltham Forest 2/3yrs ago issue first emerging unable to do this, need 300-400 hectares of SANG going on 8-hectare standard. This is where the toolbox approach has stemmed from. On the Essex side and West Anglia colleagues are negotiated SANG schemes at 8-hectare standard. Latton Priory Site a good example of that, they have tried to leave more open ended than that as there is no way any of the other sites – Meridian Water Site in Enfield, any of Gasworks or the Waltham Forest sites could produce SANG at 8H standard. Echo JD point and one reason here today is because it is such large allocation/application on the doorstep. If this was one of the other strategic solutions & there is no 400 / 500m exclusion here. Burnham Beaches Special Areas of Conservation (SAC), the Heathlands do have exclusion zones because of the proximity of the site and the recreational disturbance and urban edge effect impacts. List of potential opportunities - package of measures due to size and scale of proximity of.

ACTION MT to send across ideas from other schemes around the country.

JD – 8H per 1000, looked at & Epping Forest visitor surveys over the last 4 years conclude meaningful hectares particularly for dog walking & recreationally walking is high already in Epping Forest. Epping Forest Routes approx. 2.2 – 2.5 km route (national avg 2.4km), Epping Forest can translate in up to 30 hectares. More stark issues. What is the function realistically? What is the bigger figure need to cope with dog walking and realistically what pressure can you alleviate?

BG – An offsite SANG will not work, it will not address the impact sufficiently.

JD – Local plan proposed exclusion zone 500m. – Whipps Cross cannot fit that, exceptional case if it is to go ahead at all? Not sure how to do that in regard to Habitats Regulation Assessment (HRA).

MT – Put a list together of potential opportunities: They have gone to appeal & refused but not on ecological grounds / Natural England had no objections – refused on other grounds. Both sites relate to Special Protections Areas (SPAs).

Wisley Airfield in Guildford and Bramshill House Site in Herts – decisions approx. 2019

Positive suggestions incl: Both have mitigation packages not standard SANG / SAMM due to proximity to SPAs – argues exceptional circumstance and put together a unique package of measures. I think some of these will be palatable and form part of Whipps Cross package of measures

ACTION MP: Melina to send over documents plus the bullet point list from MT

JD – Relates to the Green Space project proposal drawn up by Andy and David. There have been previous redevelopment proposals - 2003, but we like the integration of the hospital with the forest – health and wellbeing. Principal 2 is excellent and viewed as an exciting prospect. The issue is the housing numbers and pressure / lack of green space in plans. On the west side – Fille Brook is narrow and thin, up against high rise buildings – could be seen as oppressive. 2 – 2.5hectares and not considered high quality SANG. The quality of SANG is very important. A SANG is an alternative to a quality site. At the east of the site is major part of greenery is Epping Forest itself, to the south of the Whipps Cross Road. There are other bits of Park area

and forest area & to the south east of the site approx. 2 Hectares of greenery with building fragmenting. The non-SAC forest including South of James Street add up to approx. 6 hectares. The amount of green space offered in minute – only nudging 3 to 4 hectares on what is a reasonably big site.

Given the balance of SANGs / SAMMs and Mark's input, in JD opinion the only way to get the development off the ground & address the HRA's & serious issues of recreational pressure on Epping Forest (top of the bill, just under the SAC) is that it's got to give itself more space. Can't see how you can integrate with the forest when you are spilling straight into it. Very narrow margin at the top that you are relying on at the moment. Seems there is potential onsite to create more green space but will be at the cost of removing buildings / residential.

DM– We are working with the parameters and constraints of the site and have been working closely with JD colleagues (Colin) about ways to draw people in from the forest. Aspirations of the Visitors Centre in Park Side which will include public amenities, benefitting those using the Forest, critical. Keen to create links into the site to reduce some of the pressure and create footfall to the site – symbiotic benefit.

Fille Brook benefits include water management, huge water issue to this quadrant of the site. Not only does it benefit the development but also surrounding areas. Creating green links and green streets. Introduce a route through the site called Fille Brook Lane along the culvert of Fille Brook creating connectivity and links throughout the site. Will be fairly wide, big piece of public land through the hospital site. Trying to create more connections and reduce pressures on the wider site as the same time as delivering a quantum of homes. It is a dense scheme, can't sugar coat that. Trying to create different spaces at ground levels. Through the visitor Centre understand the pressure that that part of Epping Forest – the previous figures are useful. Want to create a relationship between the two sites in our minds eye also creating connection outwards of the site is key.

JD – Re: Fille Brook - the approach is good can see Biodiversity Net Gain and some nice ideas. The key issues are the HRA and SAC. Will it be sufficient to deal with the toolbox?

The SAMM's proposed and the costings have been put forward to the local councils for discussion on Thursday 21.01.21. This is based on a report by Land Use Consultants (LUC). Based on the 3 major hotspots in the forest as well as previous calculations on what is needed for SAMM's elsewhere. There are still costs we have forgotten, things that may work as mitigation. Particular hotspot is Leytonstone Hollow Ponds. The forest land that's non-SAC, on the hospital side, we have thoughts and ideas for and are in the LUC report. I will share with you (BG has seen report previously)

Elements of that report are similar to what is being proposed here, trying to move the center of gravity away from the SAC which is not an easy job with Whipps Cross Road dividing the land. People will still want to access Hollow Ponds as it is attractive area for walking. There is some dovetailing though it seems that the Master Plan is still relying on the 6 hectares from the forest and a max of 2 hectares of hospital land being given up to greenery. The answer is to thrust on to the Conservators and we need some discussion about that. Would like to re-emphasise that the link between the hospital and the forest is an excellent idea and would like that to come to fruition. It's just that the rest of the site come with a lot of baggage and not sure if that can be coped with. And it does not come with enough green space.

BG – Is there scope to use Park Side? The patch of woodland at the moment owned by the conservators outside if the Whipps Cross boundary which is not being used currently? It is a patch of ancient woodland so there would need to be constraints around that, but could it be used as part of a SANG? Putting some management to the area, encouraging the new residents to use that rather than crossing the road into the forest?

JD – Yes & Mark agrees – In a nutshell, yes as per our LUC proposal. The proposal for SAAMS is trying to look with the current pressure of visitors using that side of the Whipps Cross Road and its non-SAC. It is an ancient site but is also a secondary woodland over what was acid grassland and wood pasture. It could be opened up and made more interesting and that what the proposals we put forward suggest. There will be the need to pay for that to take the pressure off the SAC but that is current pressure. What the Whipps Cross development will do is pile on potentially enormous numbers of extra people. Up to 4k extra based on 2.4 occupancy. Of course, this may be lower in some of the smaller flats. The issue is there are still up to 1650 residential units. Where do they get accommodated? Despite that issue, certainly yes, we would like to see that area being used more, better and more imaginatively. Opened up to more wood pasture, more attractive and indeed taking the pressure of other regular dog walks.

BG – Would that include Forest Glade? On the other side of the road? Would you potentially include that as part of the plan?

JD – Yes, South of St James Street – the area goes down to the school. Really attractive green space potentially. Lots of problems at the moment, overgrown with no priority or resources to do it. Originally ancient Oak woodland and acid grassland. Some very nice trees, but dense with holly and brambles. People do walk through, and children use the glade but could be used so much better. Would take resources to create and maintain. I'd envisage using that space and that's what the LUC report does. It is not SAC – everything to the west side if Whipps Cross Road is forest land.

The visitors center is v interesting. Visitors Centers can have value but can also be a burden, they are not for everybody. The particular problem with Epping is that the forest is so open and has huge boundaries many 100's of km. It may become a center especially likely for residents of the development but there is still the matter of viability. 2 issues: first, how many more people would it bring in because of the open access nature. It is not like driving to Cannock Chase, Staffs which is one of those sites with a much bigger ZOI. People come from a wider afield but end up at a car park or a center, it's much easier to grab them. At Epping the effectiveness would be less. Second issue: ongoing costs. Visitor's centers cost between 200-250k per year min. Another big cost to consider which may be better spent elsewhere. Although I am not as qualified as Mark and Milena, I would be cautious.

TV – Is there to be a café at the planned Visitor Centre?

DM – Yes, we are looking and are mindful of the cost and management of the center in perpetuity. We can look at a mix of uses there. There is a need for cafes on site to serve the wider community. For example, a café and bike hire connecting through to the forest. There will be a min bus route through the site. Can act as a hub or starting point for those that might be coming from further afield, so it becomes synonymous with that part of the forest.

? - So that would mean drawing in even more people in? From a wider area than Whipps Cross?

DM – We were thinking more about patients and visitors to the Whipps Cross site.

JD – I have seen this at Woodbury Wetlands & Manor Park. Very successful café on a small site, rooftop tables next to the wetland. Run by London Wildlife Trust, it seems to work very well. People come to have a drink and look. The pressure on the site is quite restricted and small. The problem with EF is that the SAC particularly, is the attraction across the road – Hollow Ponds, this may pull even more people in. The biggest problem is then where do people go with the lack of alternative green space.

OC – It is a tricky balance, make Whipps Cross attractive enough to make residents want to stay it will also bring people in from wider afield. Just what is the correct balance?

MT – We cannot stop everybody from your development going on to the SAC it's about demonstrating NET. If you can demonstrate that it will pull people off the SAC, then that offsets the journeys that will happen from your development on to the SAC. Point to note is that the most heavily used SANG in the Thames Basin is the one with a café.

OC – Demonstrating in HRA is something we have to do, how is this done? In similar situations? Reliable demonstrating that your measures are going to have the net effect of not increasing visitor numbers to Hollow Ponds?

MT – Have not really seen it done before Bram's Hill site. The SPA is fenced off with a really thick fence and augmented boundaries. People are unable to get from the development to the European Site. We share your aspirations for bring people closer to nature but that is one way of limiting impact. Not sure it is possible here though as the SAC is so accessible.

JD – Housing and numbers aside, there are currently two concessions, one run by Tristan and another unlicensed. Ideally if we can move the center of gravity away from the SAC side of the road and on to the Whipps Cross site, creating 1 attractive café, it wouldn't necessarily improve the numbers going on to the site, but it may take away the immediate pressure of gathering and trampling. Plus, the removal of current infrastructure and not having to build new would be a possible big gain. It could be offset by visitors going back over to the SAC. We must think about what's already there and offset that.

Remember we have Wanstead to the south and other attractive sites which have the potential to pull people away from the SAC. If you keep them close to the SAC with a café you might be developing more of a problem? May be better to invest with Redbridge Council – going back to the local plan HRA. Invest in more offsite? But not much capacity on uplift on any of our land at the present.

MT – To answer your question Oliver, to prove demonstration what other schemes have done is go over and above the minimum. If 8 Hectares standard, we've seen 10-12 hectares per 1k of SANG provided. We've seen double/ triple SAMM contributions provided. It's almost as if this were 2km away what would we accept, and then because you are so close, to prove no likely significant effect the package has to be augmented. Sorry I know this is not what you want to hear.

OC – And we need guidance on what is an acceptable approach.

JD – The LUC plans are clear. The plans give the kind of feel for SAMM's investment show the plan can go at Hollow Ponds. Lots of points to give food for thought. Could potentially take the SAMMS a lot further given Mark's point. Would be interesting to hear Natural England's thoughts on whether it still answers the protection issue. Some room for maneuver – that is without prejudice on my comments about the number of houses.

Tristan question 2 – point not considered: land to the north of the development and to the south of the Whipps Cross Road is where there are homeless / rough sleepers who will be displaced. There is also the issue of pollution and rubbish. It is likely they will be pushed into the SAC. The hospital is one reason that they are here, and this should be considered. It will have an effect on the SAC & SSSI.

OC – Not thought of at all

JD – ACTION JD: To provide quantities and figures on rough sleeper numbers.

IN COMBINATION ASSESSMENT

OC – Issue up in the air, need to agree what we need to include. Scoping document committed developments. NE gave a much longer list.

Need to pin down how broad the scope should be?

Air pollution

MT– Guidance of 2018, NE does not give advice on the scope in combination and that you should speak to Waltham Forest as the competent authority. As a practitioner I give advice- look at the Boroughs directly around/border Waltham Forest. Only look further afield if really big busy roads, big contributors to air pollution.

Recreational Disturbance

MT – Just the Boroughs that are caught out by strategic solution: Newham, Waltham forest, Redbridge, Enfield and possibly Epping Forest on the Essex side. First instance look at London Boroughs. Looking at engaging Hackney & London Legacy Development Corporation.

NET GAIN APPROACH

BG – Standard approach 10% do NE want more?

MP – not specified

OC – Go by local plan.

AIR QUALITY

AT – Understand, high levels of Nitrogen Deposition and Acid Deposition.

Want view from NE and CoL on this. Air Pollution Information System – Nitrogen Deposition rates at site exceed substantially lower critical loads – noticeable pressure on habitats as a consequence.

JD – Big impact on beech trees and heathlands. Very serious issue. Clearly a problem with emphasis on roads to North of forest. Impacts similarly on road out district particularly A12 / M11 junctions.

AT – Existing site – sources are traffic, staff parking, emission's, tail pipe of NOx and ammonia. On site at the moment are dual fuel boilers for heating and water and back up diesel generators scattered around site. Will be looking into the energy side of things further.

New development replaces combustion sources on site with air source zero emission heat pumps. There is emergency life support by new diesel generator set. Will be a decreased routine emissions pattern to v low.

Road Traffic – 1.2k car park currently. New site smaller car park for hospital. Residential site will be essentially car free excluding blue badges. Most traffic will be via Whipps Cross Road roundabout and Leigh Bridge Road. **ACTION AT** to look at this further.

Back up Diesel generator very large 12-megawatt electrical output, 35-megawatt thermal input. Generators will operate for maintenance only 1-2 hour per month, once annually for full load testing. Do produce a lot of NOx. Currently being looked at in design – issue of ammonia slip from the top of the stack to be carefully considered.

Could be good news in terms of reduction, may be a slight increase? Elsewhere in the Epping Forest District a slight increase has been viewed as potentially unacceptable. Not looking at managing a screening criterion unless there is a demonstrable reduction. Will be looking to include those roads in the model for impact.

Baseline diffusion survey – 3 months to gather data ND levels.

ACTION BG to share plan with NE

Set up round the periphery of the SAC and a couple on the existing signposts within the boundary of the SAC. Would like more extensive coverage up to 200 m from the roads but would need posts driven in to hang tubes on – JD is this acceptable?

JD – Yes acceptable. Please use trees and natural sites. so that people don't spot them. Will produce valuable and necessary data.

AT – Will do this on next visit or before if possible – when is this going to be done? Challenge facing is ES & HRA timetable. Tubes out in Dec only giving 3 months data. **ACTION AT** to put out more tubes for data collection asap.

JD - Would like 9 months data ideally, need to get the extra tubes out in the next week. Key re COVID and Social distance please take photos of where you will put the tubes. JD can come week after next if necessary, to view. Please advise GPS locations for tubes. Have a GIS officer for any constraints? **ACTION AT** to get a colleague to look at that asap.

AT – Not sure how he is going to proceed as need firm data on traffic and energy center – the modelling for both traffic and energy center would look at NOx & ammonia. From vehicles re ammonia no Defra emissions factors, but air quality consultants use a tool to calculate air quality emissions of ammonia.

Ammonia likely to go up and NOx is likely to go down. Ben Manner paper – vehicle fleet data not the most up to date. – banning petrol/diesel vehicles. Ammonia from hybrid will go up. AT to speak to Ben re tool and have made some slight adjustments to allow for electric cars but not hybrid.

?- Evidence submitted to EPDC plan suggested projections are not likely to be accurate re the fleet. Possible undervaluing of ammonia contributions – NE may have a view?

MT – Don't want to keep as is. The European Court Judgement say that you can include some level of improvement. Figures from 2% downwards year on year. Suggest speaking to Jo Rosh? Bracknell and Wokingham area – **ACTION AT** to contact Jo for more info.

AT – Want to be open with any uncertainty. Energy Centre back up diesel generators - short term impact of running of those – NE thoughts?

MT – Don't look at 24hr, look at annual figures, if Annual Average Daily Traffic (AADT) goes down road wise overall there will be no issue. We've accepted Thames 50 AADT increase.

JD - Car free modelling fairly skeptical – University of the West of England (UWE Bristol) not that convincing. What percentage of residents who will use it? Will you build in contingency? Model servicing vehicles – click and collect/taxis – Need to be answered clearly in future – **ACTION AT** to seek answers from traffic colleagues to get a better understating on this

FINAL ACTIONS REQUIRED FROM ORBIS:

Create timeline for reviews of Master plan / Environmental Appraisals? – don't have a timeline in head would be useful to have something as to what and when.

How does air quality dovetail with HRA local plan? Seems key especially around wider traffic issues.

Meeting Ends

Discretionary Advice Service Meeting – Whipps Cross 26.02.21 – Approved meeting minutes

Present in Teams meeting starting at 9am on 26.02.21

Orbis Ecology: Bryony Gillet - BG	Ryder–Masterplan Team: David McMahon: DM
Orbis Ecology: Oliver Chope – OC	AECOM, Project manager: George Caleap: GC
Orbis Ecology: Emma Frewin - EF	Landscape Architect – Ryan Sudall – RS
Natural England: Marc Turner - MT	Barts - Deborah Sinclair-Day - DSD
Natural England: Milena Petrovic – MP	London Borough Waltham Forest - Kelvin Baithe – KB
Natural England - Isabella Jack - IJ	London Borough Waltham Forest - Amy Conway – AC
City of London Corporation (CoL) act as the Conservators of Epping Forest: Jeremy Dagley – JD	London Borough Waltham Forest - Matt Duigan - MD
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	GI Hearn Town Planning – Laura Meyer - LM
	WSP – Andy Talbot – AT

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Strategic Access Management and Monitoring Strategy (SAMMS)

Suitable Alternative Natural Green Space (SANGS)

Sustainability Appraisal (SA)

Ultra Low Emission Zone (ULEZ)

OC – Introduced DSD and handed over for run through of Master Plan with DM and Landscape plan with RS

DM – Gave consolidated version of Master Plan for those who had not been included in previous meetings

RS – Gave presentation of the key concepts of the landscape plan including:

- Forest Park
- Chapel Park – formal heritage site
- Whipps Cross Avenue – the spine of site
- Linear Parks connecting east to west
- Fille Brook Park

Also included the ancient woodland which is not approved in the plan as yet but has potential of being brought in to use in the future.

Play opportunities as per outline plan well within amenity space of the Waltham Forest calculator, 1/3 over provision.

Approximate total of 6 hectares of amenity space available across the site.

TV asked q in chat re provision of BBQ in public spaces and the potential fire risk

RS to take away and review

OC – Any questions?

MD – Invite Kelvin to describe about Policy Provision in relation to the site

KB – In terms of local plan policy map - shown as white land, terms of usage of land not putting anything that hasn't been there before. Uses are established. But there is the conservation area adjacent to the hospital- Green belt, Special Areas of Conservation (SAC), Site of Special Scientific Interest (SSSI) and Metropolitan Site of Importance for Nature Conservation (SINC) in the areas identified.

Fille Brook area great to see area having treatment and minor wetland welcomed. Principal constraints are in relation to Epping Forest SAC/SSSI/Metropolitan SINC/Green belt all things covered so far.

OC – We do need to cover some smaller points to address Air Quality and In-Combination Assessments but will stick to landscaping green aspect following on from RS presentation:

PROPOSED MITIGATION – OC TO LEAD

Key point is Mitigating Recreational Impacts to the adjacent SAC, SSSI & Metropolitan SINC areas

- Strand one – Onsite green provision looks amazing – thank you Ryan
- Strand two - Need to address areas of immediately woodland adjacent to the site. (OC shares screen to show sites) These sites obvious contenders for additional management & improvement. They offer potential solution's in helping to soak up additional pressure from additional residents, alongside provision on site. OC & BG conducted a site visit recently to the Ancient Woodland & Forest Glade sites.
 - Ancient Woodland site has no amenity value currently. It is neglected, well used by the homeless community, which is a separate issue and is a dumping ground. Real potential for habitat management This site offers real potential with active management and improvements to the area.

- Forest Glade is much more similar to the Hollow Ponds area are, already used as a major pedestrian throughfare due to a pedestrian crossing and major path through to the Hollow Ponds area but there is much room for improvement.
- Both areas are Corporation of London land, are outside of the SAC and are Metropolitan SINC area. Great opportunity.
- Strand three – Work at Hollow Ponds, would benefit from extra money for management. As per Land Use Consultants (LUC) study for concept mitigation proposals to improve the area. We would propose Strategic Access Management and Monitoring Strategy (SAMMS) payments would fund a portion of these measures. OC & BG saw site at worst after sustained rainfall. Paths were muddy and expanded to avoid mud, lots of unofficial paths as main throughfares are not in good condition. Official, well maintained paths would help with the reduction of people walking through the woodland creating extra unofficial paths.

Proposal would include:

- a combination of onsite provision which is over and above policy demands
- Improvement to adjacent Ancient Woodland and Forest Glade Sites
- Additional management measures to Hollow Ponds area
- Extra measures onsite to include activity trails, Forest School/education facility (Ancient Woodland would be ideal with agreement) Café facilities
- Biodiversity on site would be expected
- Continuity with the SAC habitat type will be much enhanced by use of the Ancient Woodland and Forest Glade. Once improved will provide a transition between the parkland and the Whippys Cross site.
- Wardens required to keep everything in good managed condition, avoiding situation such as the one OC & BG found onsite (OC shared photo of litter in the Ancient Woodland)
- Bringing the area in to active use/active management would be of huge benefit.

ACTIONS: Need to agree on whether proposals are acceptable, whether quantum is enough and relies on the conservators agreeing that the proposal are acceptable and the mechanisms that conservator lands could be brought into the mitigation plans.

Orbis Ecology are responsible for developing mitigation proposals. Agreement will need to be between NE/CoL/LBWF and the applicant.

MT – We first need the thoughts of City Of London Corporation (COL) (JD) on the green space. Initial thoughts - Great job on site, one of the best designs for green aspiration and linking features. Would be very supportive to contribution to SAMM project at Hollow Ponds. Supportive of green space areas identified – but it will rely on what JD has to say.

JD – Agree with Marc, good to see the dovetailing with the LUC. Agree they are neglected areas. LOC spend plus 250k per year on litter picking plus volunteer litter picks – immense pressure (TV – added note to chat function that this was increased to £400k this year due to increased visitors/Covid) Maintenance costs are an issue/viability.

- Quantum is the key issue, over 3k new resident there is just not enough space to cope. Need to note Forest Glade is a through route already, whilst it would be great to be uplifted, it is already in use. Would like to know if the quantum is going to be revised?
- 2nd point re: work in the SAC area as per the LUC study diagram. Need to shift the Centre of gravity away from Hollow Ponds. See pg 68 of study for more info. Top of figure 4.3 is an area which needs more emphasis, northern section v important. Connecting with the Chapel area, café area and Northern access to the hospital as it currently is. Making looped walks from this area would help with this. Does not get around the issue of Quantum though.

DM – Quantum – we are developing the proposal as we move forward. The figure is 1500 homes, figure 1650 is an out-of-date figure.

JD – Is 1500 essential to funding to hospital?

DSD – Viability is an issue. Need established Quantum but have strategic outline for 1500 units which is challenging already. Does cause a viability issue for the construction of the hospital.

OC – If we had a blank slate what capacity do you think it would hold?

JC – Concern from Conservators is any additional residents. The site is already a draw because of Hollow Ponds which is arguably already over capacity limits. Alternative sites and Suitable Alternative Natural Green Space (SANGS) and infrastructure remain an issue.

Where is the spare capacity for hospital expansion? Whipps Cross has a large reach, is hospital too small?

DSD – Are areas of revised scheme following phase 1 consultation, taken this on board and phase 2 shows areas of expansion retained within the red line. Further expansion includes health and community center again within the red line.

DM – Brief developed includes future models including population growth over a period of time. There is space for expansion to the west of the hospital is needed. – as per consultation process.

MT – Natural England are supportive of everything put forward – in terms of SAMM contributions to Hollow Ponds area, green space on and off site. OC Question over whether this is enough and is where there is a struggle. – Large development meters from SAC .

Need more detail, need to understand what looking at with the green spaces / city land / what contribution to the SAMM pot likely to be. Waltham Forest will complete a Habitats Regulations Assessment (HRA) to set an appropriate assessment, Orbis will provide the information to inform that.

Unable to give answer today. Will need to see that info and justification before giving a direct answer. Massive strides in right direction, very pleased about that.

OC: SAMMS tariff – is this specific to project or do the council have a formula?

KB – Working on interim £100 per unit basis. Possible room for discussion.

MT – Interim position, there is a meeting this afternoon to discuss aspirations for the tariff to increase with the more comprehensive package of measures COL have put together and are discussing.

OC – The Scope / range mitigation measure funded is dependent on tariff?

MT – No, would ignore tariff as such a large increase in the number of dwellings is proposed. Would need to agree a bespoke level of contribution at outline application stage. This would not change between outline and reserved matters stage whereas a tariff would go up over a period of time and there would need to be an agreement in place that this would be paid at the increased tariff rate. (Elvin opinion – legal opinion sought by Bracknell Forest council). Steer away from tariffs and look to agree a bespoke package. Will need to provide mitigation in advance of first occupation.

No, would ignore tariff as such a large increase. Would need a bespoke contribution at outline application stage. This would not change between outline and reserved matters stage whereas a tariff would go up over a period of time and there would need to be an agreement in place that this would be paid at the increased tariff rate. (Elvin opinion – legal opinion sought by Bracknell Forest council). Steer away from that and look to agree a bespoke package. Will need to provide mitigation in advance of first occupation, does not need to be provided at outline stage.

JD – In perpetuity figures - need to ensure mitigation can last

Hospital expansion paid for? Population expansion up to 2035? Is there a modular expansion planned for residential?

DM – Separate land for development will be bought by developer running up to 2035. Masterplan will go out to developers. We are forecasting best we can. Barts Trust will be developing the hospital land.

DSD – Any future residential development would be subject to another planning application.

MT leaves meeting

IN-COMBINATION ASSESSMENT

OC – Data gathering for committed development for HRA. Some confusion over how wide an area needed. Initially looked at 6.2km ZOI as per recreational studies but produced an absurd amount of potential data. For Ecological Impact Assessment (EIA), now looking at 1km of Whipps Cross for recreation and air quality. Need to confirm if adequate for in-combination assessment for recreational and air quality impacts?

MP – Air quality effect on your own?

OC – Will bring AT in at this point.

AIR QUALITY

AT – Initial recap of last meeting points. Will now focus on traffic and ongoing baseline monitoring.

AT shared screen to show road traffic diagram at Whipps Cross Hospital development in 2027 the new hospital in expected to be completed by this year.

- Annual daily traffic numbers negative – smaller car park /predicted less road traffic
- Modest beneficial impact
- Not to consider air quality in SAC for 2027?

- Do we have agreement that this is satisfactory?

AT shared screen to show road traffic diagram at residential development in 2038 (expected year for the masterplan scheme to be completed).

- Increase in traffic – positive numbers
- Even a small increase can be of concern
- To be addressed in the EIA and HRA
- Need to undertake modeling and would like to understand assumptions of emissions from NOx / ammonia from vehicles.
- Preference would be to be guided by the Joint Nature Conservation Committee (JNCC) Nitrogen Futures report

Are NE & COL in agreement re 2027 Hospital scenario?

MP - JD comments? Air quality not my area.

JD - Yes agree with 2027 model no obvious requirement for immediate mitigation. Need to ensure if model is incorrect there are policies precise enough that there will be a break in development so no adverse impact (only in respect of the masterplan).

KB – As part of Sustainability Appraisal (SA) / HRA of local plan air quality strategy underway with consultants. Joining up here would be of immense value, will have to look at offline with colleagues.

JD – In-combination and impact of potential traffic congestion on roads to be considered. Linking to AECOM’s works within their HRA. Wider examination of the AECOM’s work will need to be looked at. Will the Epping Forest District Council (EFDC) Clean Air Zone cope with the in-combination increase?

KB – Ultra Low Emission Zone (ULEZ) coming on to effect in in October 2021. Lot to consider. Other large developments all need to be factored in.

JD – Project level assessment difficult - Project level HRA can’t deal with the in-combination, may trigger threshold.

AT – Regarding baseline monitoring, there will be just sufficient data from the 3-month survey to support the Air Quality (AQ) Assessment and HRA, and this will be supplemented by information from 2 months of data from the additional sites within the SAC, but there will be some uncertainty given Covid lockdown (to be addressed in the AQ Assessment). Intend to continue with baseline monitoring beyond the application submission date.

No objections were raised regarding the limited monitoring to support the AQ Assessment and HRA.

JD – Support continuation of monitoring

MP – Should also use traffic data pre covid

AT – Confirms that baseline traffic data from 2019 (pre-pandemic) is being used.

WRAPPING UP / AOB

BG – Do we need to consider in-combination assessment outside of Air Quality? parameters?

OC – Recreational impact scheme has a significant impact on its own, so in-combination will not need to be considered.

MP – Agree with OC, having an effect so need to consider alone impact rather than going to in-combination.

IJ – shared NE publication on Air Quality Impact and Interpretation of AADT Figures.

Meeting ends

Present in Teams meeting starting at 11.30am on 26.03.21

Orbis Ecology: Bryony Gillet - BG	London Borough Waltham Forest - Kelvin Bathie – KB
Orbis Ecology: Oliver Chope – OC	London Borough Waltham Forest - Amy Conway – AC
Orbis Ecology: Emma Frewin – EF	London Borough Waltham Forest - Matt Duigan
Chris Turner: Lakeway Ecology - CT	City of London Corporation (CoL) Conservators of Epping Forest: Jeremy Dagley – JD
Natural England: Marc Turner - MT	City of London Corporation (CoL) Conservators of Epping Forest: Tristan Vetta – TV
Natural England: Milena Petrovic – MP	
Natural England - Isabella Jack - IJ	

Acronym definitions

City of London Corporation (CoL)

Ecological Impact Assessment (EIA)

Epping Forest District Council (EFDC)

Habitats Regulation Assessment (HRA)

Land Use Consultants (LUC)

London Borough Waltham Forest (LBFW)

Natural England (NE)

Special Areas of Conservation (SAC)

Strategic Access Management and Monitoring Strategy (SAMMS)

Suitable Alternative Natural Green Space (SANGS)

Sustainability Appraisal (SA)

Oliver Chope – Introduced meeting with aim as no agenda produced: As submission dates draw near, Orbis Ecology would like to get some agreement in principal that what we are putting forward is adequate and acceptable in terms of the Mitigation Strategy.

OC Gave consolidated version of Master Plan/Landscape Plan as brief refresher & shared Master Plan site map on screen for context.

OC - We feel that it is a good scheme in conjunction with what else we are proposing, it is a good overall offer. Would like to discuss the Ancient Woodland – currently unmanaged & would benefit from management and Forest Glade – in better condition with some used paths but areas are overgrown and currently a through route rather than dwelling place and the SAC.

OC also shared Tree Removal Mitigation Plan on screen for context, to show extent of new planting, losses and retention and to illustrate the tree planting net gain which will be achieved in the scheme.

PROPOSED MITIGATION – OC TO LEAD

Mitigating Recreational Impacts to the adjacent SAC, SSSI & Metropolitan SINC areas

OC shared Whipps Cross recreational Pressures Mitigation Map on screen (also shared prior to meeting via email). Illustrative proposals based on the LUC Mitigation document produced last year.

OC - Forest Glade & Ancient Woodland: Both comprise of fairly straightforward woodland management: undergrowth managed – clearing invasive holly, glade creation, way finding, bins and benches where appropriate and upgraded paths.

- In the Ancient Woodland there are no paths presently, once undergrowth managed would propose creating paths, nothing too formal – woodchip? To tie in with Forest Park, providing additional recreational space on this side of Whipps Cross, adjacent to the site and between Whipps Cross and the SAC.
- In Forest Glade to provide similar function, the current paths are wide and muddy and are in need of some formalization of paths (again woodchip?), clearing of glades, benches to encourage people to use area rather than as a through route.
- The SAC: The LUC report identified short term improvement measures and a number of long-term measures to manage the area. Given lifespan of Whipps Cross development, it is felt some of the longer-term measures are worth considering to help with the additional recreational pressures.
 - One aspect is to shift the center of gravity of how people use the area to the north west. Existing entrance here which could be improved with signage, existing cycle route & foot path heading to this area also. With improvements proposed and making the area more accessible, people would use this woodland area more, relieving some of the concentrated pressures.
 - Larger scale proposals include a circular footpath around Hollow Ponds requiring boardwalks, preventing erosion and regrading parts of the Hollow Ponds shoreline to produce better wildlife habitat in the margins of the pond and to enhance the overall area.
 - Big impact to be addressed in the qualifying features of the SAC is problems of overuse of the acid grasslands area. Currently heavily used and crisscrossed with paths. Proposal is that we use the area highlighted in green on the map as formalized amenity grassland for picnicking and dog walking. Segregating in a light-handed way – information/educational boards to try to prevent people/traffic walking across. To be used in tandem with a program of gradual restoration of the grasslands by sectioning off an area to allow recovery before moving on to the next area. Upgrade paths to encourage people to use formal pathways rather than cutting across wet acid grasslands.

Above are ideas of ways of managing the use of the area in ways to protect the features of interest and enhancing it for people use. Futile to try to prevent people from Whipps Cross using the area, we need to accept it & put in measures to manage and enhance the development side of Whipps Cross Road to encourage use reducing how often people go to Hollow Ponds.

- A vital part of the proposal is the Visitor Centre, café and amenities within the Chapel Park area of the Whipps Cross Development Site. Understand this is difficult for the Conservators as they have existing catering concessions where income is generated, but the benefits to the management of area will far outweigh any potential loss of income. The whole area will be able to be managed to protect the habitat, Conservators may even wish to remove carparks. There will be no longer a need for provision of toilets needed and people could be encouraged from Hollow Ponds on to the Whipps Cross site to use the café and amenities. This would be an important part of the overall scheme.

OC invited questions – none forthcoming at this point.

OC – Recognise from previous discussions that the scheme is relying on the SAMM’s approach to mitigating recreational impact due to lack of potential SANG’s measures which would meet current policy – 8 hectares per 1000 people. Also looked at a strategic approach to SANGS elsewhere, but after looking at other schemes that proposed this route, they are almost indistinguishable from the SAMM’s approach, there would be a strategic SANG somewhere else in Epping Forest funding management measures for that area, it starts to look very much like a SAMM’s approach in reality. We felt it more important to focus on the Leyton Flats area to achieve the greatest benefit for what the development could contribute to the management of Leyton Flats and Hollow Ponds. We feel it would be best to concentrate on this area to do some significant work, we know it is unusual, but it is an unusual situation, and this would achieve the best outcomes.

Matthew Duigan: Re: the offsite enhancements that you are proposing. If this is the agreed way forward, we would secure that in a section 106, in terms of you do the work if that was what was agreed, or you fund the work and then the Corporation or NE do the work and you pay for it. You need to be thinking about that going into a legal agreement and if it’s going to be the funding of it, you will need a scope of works which will be carried out and the costs and how it will be funded. I need that for the application stage, if it is an agreed approach.

Coming back to the application site, you’re proposing SANGS in terms of Chapel Park and the Fille Brook. Landscaping is a reserved matters, what are you going to commit to given that it is outlined with landscaping reserved? Are you going to have some sort of landscaping commitment document that says notwithstanding the fact that this is all outline and therefore a little bit ambiguous because it’s outline. What are you going to commit to at the application stage? and say this is for approval or as a parameter and it won’t get watered down at a reserved matters stage

OC: There is a Landscape Parameters plan to be submitted.

MD: I believe there needs to be some sort of iron clad undertaking at the outline stage that these SANGS will be produced. I would like something that is binding, or I can put it in the section 106?

OC: Should probably be as a commitment to do them, rather than in the 106?

MD: It can’t be illustrative detail; you need to be committing to doing it. Alternatively, do not have landscaping as a reserved matter, bring it forward. (MD Acknowledges time is restrictive so unlikely to have time) We need commitment to, not an illustrative “we might do this”, we need a “we are definitely going to”.

ACTION OC – to speak to relevant parties

Marc Turner: Agree with what Matt said, you will need that for the Habitat Regulations Assessment (HRA). Natural England need to know the mitigation package is secured and agreed. Just to clarify it will not be NE spending the money, it will likely be the Conservators as the landowner. It will need to be secured for perpetuity and in the document. I thoroughly support Matt’s comment.

Oliver your comments:

- Looking at other options re offsite SANGS – totally agree with you, this is a unique circumstance, need to be looking at that area of the SAC. Looking elsewhere may have had minor beneficial impacts but where you have targeted your effort is the right approach. It is a big scheme, size, scale and location puts it on doorstep of the SAC. You mention focus on SAMM, but it doesn't matter whether it's a SAMM or SANG we will access it as a package of measures.

In principle due to the size, scale and proximity, we are going to have to see the appropriate assessments so can give in principle comments today but will not be able to finally agree to sign anything off until we have seen the appropriate assessment, but we will hopefully give a reasonable steer today. Another caveat - a lot of the proposals will need agreement from the City of London Corporation as it is their land, we might say "happy with package as a whole" but if there are problems with delivery it will influence how we have to respond when the application is at our desk.

Bryony's document earlier in week really useful and have prepared response around that. With the caveats and in principle points made, our comments have not changed, regarding the on-site works proposed to do on a heavily constrained site in London you have done what you can:

- Green walls
- Biodiversity Corridors
- On-Site SANG

Fully in agreement and will support the application.

Likewise, items 12 & 15 in the LUC report, the Forest Glade & the Ancient Woodland, proposals are fully in keeping with a SANG style approach. NE would be interested and appreciate hearing CoL's views on anything they feel is needed on that.

SAC points:

- Discussion to be had about the path around the whole site - was not in the LUC report, would be worthwhile to discuss any knock-on implications/effect and to get CoL view – will park for now
- No 8 in LUC report - Circular trail with the boardwalk – fully support
- No. 6 in LUC report - Mini Holland Transport hub – fully support
- No 4 in LUC report - Improved signage and waymarking – fully support
- No 11 in LUC report - Glade Creation – fully support
- Measure to reduce erosion around acid grasslands, particularly the protection of the area – NE support that but would be interested to hear LoC thoughts on the amenity green area proposed. In principle supported.

Points missing from NE perspective:

- No 9 in LUC report - Hollow Pond edges work – happy to discuss, NE were of the opinion originally that this could be included?
- No 18 in LUC report – The SAC Ambassador, NE feel strongly about this point. People will go to the SAC, having some presence on site is key. Discussed previously wardening on buffer lands, could this be one whole role? Promoting positive behaviours when people get to the SAC must be done and that can only be done by presence of an Ambassador. NE feel very strongly that some element should be included in the package.

In conclusion: on the right lines, happy with majority of what is included, not against the circular walk but needs further discussion. All is in principle in seeing an appropriate assessment and having agreement from the delivery body.

OC – Thank you Marc and agree regarding the Ambassador presence, Orbis think it is important too.

Bryony Gillett - Is there already a warden at Hollow Ponds?

Tristan Vetta – Not specifically for this, have Forest Keepers working across entirety of the forest. No dedicated Keeper for that area.

BG – In your opinion would it be beneficial to have someone dedicated to working in the Hollow Ponds area?

TV – Yes, would be great to have that everywhere.

Jeremy Dagley – Re point about everywhere, CoL think the role the SAC Ambassador is essential, but the mitigation package as a whole would need the "rule of 3" – a team to move between all the sites and provide cover for weekends and leave. Whilst Hollow Ponds is a most populous site it cannot be seen as a role in isolation. It would need to fit in to the bigger picture of SAC Mitigation.

BG – How would you see that working? Rotation?

JD – LUC report looked at main 3 hubs of the SAC, a team of 3 could rotate and cover leave and weekend working. A single isolated post will not work. Whilst the Whipps Cross package would not have to pay for other Ambassadors across the Forest it will have to work with a bigger package to be identified with the local authorities. Clearly a dedicated post to this area would be very important as it is so busy and due to the scale of the development at Whipps Cross, if it were to go ahead (without prejudice) would further increase the need for this post.

MT – Flexibility is needed in role, possibly areas of the SAC where no need/greater need – flexibility need to be built in. The LUC document was developed for CoL for the strategic solutions as a whole not just Whipps Cross development. Need to make it flexible for the delivery body.

MD – How much would an Ambassador cost? Thinking of planning obligation.

JD – £50k annual is what has been costed for the mitigation strategy, to take in wages plus o- costs and equipment and access to a vehicle at times.

MD – For how many years? Forever?

JD – This is an important question, particularly for wider Local Authority discussions. There are different categories of mitigation, some front-loaded and some requiring intermittent maintenance funding. An SAC Ambassador role would be an annual commitment and, in effect, forever.

MD – For the life of the development.

JD – Yes, for which the legal term is *in perpetuity*. The City Corporation has had Forest Keepers for 140 years and I can't see that requirement changing. (Refers to the other mitigations which are front loaded or a one off as not being so easily costed). The Ambassador role cost is, therefore, clear.

MD - Re mitigation works in Forested areas – who would cost that up and would the money be paid to the CoL? – Need to know this for the section 106.

JD – The structure and governance is not yet in place for the roll out of SAC Mitigation works; the Local Authorities are just now discussing those issues. SAC Oversight Group are meeting later today, and discussions around this will probably carry on for a number of weeks. It is still to be discussed and to be decided upon who will act as the banker/releasing money & auditing. Likely CoL will be authority (the delivery body) putting things in place and responsible doing the work. The costings in the LUC plan are as precise and as detailed as possible but may need to be refine costings for landscaping within the development itself. A Quantity Surveyor was asked to check through these costings for the LUC report.

MT – Conversations are ongoing about Governance re SAMM project and decisions will not be made in the time period before this application. Suggest a different approach – a contribution to the council or CoL. Agreed by that the Local Authorities CoL would be preferred delivery body, JD to take this back to CoL for approval. Meeting to decide on the Banker for SAMM project will be at the end of April.

MD – Timing for residential component – in the future so will allow time for this to be resolved. The Section 106 will need a review trigger prior to the commencement of the residential portion, to revisit everything including costs – then submit for agreement and approval. Need to get agreement from CoL as to which direction they want to go. In terms of governance would have 4-5 years to agree.

OC – Health Trust needs to put together their business case.

MD – Inform their outline business case with an estimate of the full amount in terms of section 106, theoretical calculation now to be revisited in actuality at Reserved Matters stage.

Population yield – as not known as yet: 1300 -1500 depending on housing need. If we fix the need now but it changes over next 15 years this will cause a problem. Guestimate based on policy compliant mix of housing. These costs can't be used as planning application but can help inform the outline business case.

Key is that the estimated costs are as accurate as possible.

JD & MD – SAC Ambassador role & other costings in LUC report based on 25 years. Discussion re: costings in terms of 'the life of the development' verses in perpetuity.

JD – Issue is where there is not a clear annual payment for e.g., the SAC Ambassador role, is where the costings in the LUC report will need to be looked at and ensure any business case is calculated on that.

MD – in agreement.

JD - Everything I am saying is without prejudice to our position on the whole application as CoL have reservations over the application – size, scale and proximity to the Forest and SAC.

OC – How can we give the EF trust some comfort in this respect?

JD – Unable to do that. Other factors at play in relation to the development which I can't speak about here but may affect our position. I can't speak for our trustees', earliest we will meet to discuss is May. It is down to our trustees to decide on what they thought of the Whipps Cross application and its impact on both the SAC and wider Forest as a whole. As an officer I will make a recommendation and I am advising you as consultants I support what Marc has said in relation to the right items being chosen from the package of SAMMS measures. I am also pleased the Ambassador role has been picked up. They are the correct elements LUC have identified. The issue for CoL is whether the development is still appropriate. We have to reserve our position as NE have done on appropriate assessment. The mitigation has to be certain, and it has to be effective to be compliant. Our other concern is related to the local plan, we fully support the 500metre zone: policy 8C. Anything that close to an SAC/Forest is impossible to avoid the inevitable recreational pressure. Although arguably an arbitrary distance it is one that is reasonable in the face of the evidence of impacts, and we fully agree and support the LBWF Local Plan Regulation 19 version on that point of policy. Main concern is that the Whipps Cross development with its scale and size does not fit with this 500m zone at all. I would be looking for the Project-level HRA Appropriate Assessment to demonstrate why Whipps Cross should be an exception and how it would be possible to ignore Policy 83C in the Local Plan, that as I've said, we agree with. It remains a big issue.

Kelvin Bathie – No comment at this stage, will comment is due course.

OC – We need to finalise and present, good steers given on the Section 106 requirement and on the mitigation having to be certain and effective and secured. Should not be difficult for the onsite landscape plan. How do incorporate the elements that come later?

JD – The Whipps Cross Development is moving ahead quickly and is going ahead of the local plan and regulation 19. Also going ahead of the wider SAC governance structures and mitigation decisions. Whipps Cross also does not fit into an existing structure. Plus, other negotiations and complexities going on which will affect things separate to the SAC meetings. The scale is really the big issue and is raising difficult questions.

In relation to the SANGS on-site landscaping, the only concern raised is the intrusion of buildings into the non-SAC buffer area. CoL would be supplying the Forest Glade and Ancient Woodland- 6.5 hectares in total - which is CoL Epping Forest Land. CoL would like to know why the 2 hectares of land with existing buildings on it has not been earmarked for removal to allow a more complete buffer. Presume this is not Barts Health buildings but is it NHS owned? CoL will want to make a comment on this area as we can't see why those buildings are not being removed and the buffer improved.

MD – The buildings are a secure in-patient mental health facility run by a different organization. The facility is needed and there is nowhere else for it to go. That's may change in the future.

JD – Why it can't be moved as per the new hospital in the new footprint? A new facility? It is NHS owned. If the SAC mitigation is being taken seriously there is an issue here. We are concerned that by the haste and speed of the development, is it something that has been missed?

BG – Originally the Forest Site was included as part of the Master Plan, with plans to build on that site. Something has changed, perhaps after discussion with the various Trusts involved in the site meaning that plan is not feasible, and the facility cannot be moved. The boundary line has changed and there is a lot of discussion around that site. It still may be a case that it may change/move?

JD – How is that mental health facility site impacted by the residential site? Lots of unanswered questions which we will be asking.

MT – Do not worry about the other meetings – they are a strategic solution as a whole. Focus on assessing your own scheme and is likely significant effect being caused on the SAC with this scheme?

We have given direct pointers, you have acknowledged the Ambassador role, we have not really discussed the pond edges or circular walk. You have put together the package that you could put together. You can't magic things up that aren't there. Because of the size, scale and proximity to the SAC it is going to have to go to the appropriate assessment stage. If it were 3-4 kilometers away, we would in principle say the package is enough from NE, but we need to see the justification and we need to see the security.

You have put in everything that you can, it comes down to the fundamental point of whether a development of that size and scale is in the right location. NE are not going to get involved in that and we feel that we have helped you as much as we can. Happy to look at drafts of the HRA.

BG – Did you want to discuss the circular walk?

JD – CoL are not sure about the circular walk, can see the need for a bigger walk (2.2km dog walk). One question to be raised is: would it be effective to pull people away from pressure on the SAC or will it pull even more people in?

BG – Idea is to stop people cutting through that area of heathland.

JD – The SW-NE diagonal pathway has been there for over 100 years – this can be seen from old maps and aerial photos shown up in research by LUC and CoL. Need to understand the costs involved as would not want to draw away from impacts elsewhere.

Great concern we have in the mitigation plan is point 12 and 15, the non-SAC woodlands. There are rough sleepers and litter issues. Massive issue of displacement, potentially on to the SAC or elsewhere which will then bring other parties to become involved and the associated costs of the displacement.

Also concern over ongoing maintenance costs of the non-SAC woodlands. Residents will want this area to be kept managed in a particular way to keep neat and tidy. There will be expectations from this new group of residents. CoL will have to deal with the residents and the on-going costs of this raised expectation and amenity value.

TV – In agreement with JD points above

KB – Such pressure from new residents will not be in isolation. 65 sites identified in the LP 2 document. It forms part of a wider discussion beyond the scope of this development. Room for engagement at a political level.

TV – Site is literally on top of the forest, which will have more of an effect as there will be a resident’s approach not just a visitor approach. Potential for residents’ groups being demanding and becoming a drain on resources.

KB – Understand that point, there is a large community in this general area already. Also poses challenges for us. As indicated, here possible 4K out of a potential 27k plus over planned period of the local plan, some of which will have some bearing on SAC. There is point but it extends beyond this.

JD – Agree, potential residential population increase of 60k plus. With this development CoL will be the big contributors of green space and we would like recognition that CoL are going to be faced with a coherent and vocal block of residents – a major burden to take on and a political pressure. It is a tight development and there is not an alternative green space for them to use.

OC – Would you not envisage an ongoing income for costs from resident management/service fee from Whipps Cross development with part of that coming to you for on-going costs associated with the mitigation proposals?

JD – Normally Mitigation is usually a one-off tariff. Would depend on how the developers and local authority manage the income. If we are the delivery body delivering, how would any such regular income get to us? Not a model I recognize at present.

OC – Not sure if it is a valid one but seems sensible that ongoing mitigation proposals are met in part by some form of on-going management fee imposed on the residents. Matthew thoughts?

MD – Happens by default, the property developer would agree a fee per year in perpetuity to put towards maintenance etc. How that central ownership pays for that is through ground rents, refuse, management fee.

MT – The points JD & TV have made are separate from HRA, it is an issue for the council as a whole.

JD – Agree with MT not part of the HRA, but it is part of what will affect out trustees’ approach in response to the development and its impact on the Forest overall.

MD – Material consideration to know as part of the site wide strategy from the planning perspective. Possible obligation for an ecological educational plan for residents about the SAC?

JD – Good point and good addition but separate from the mitigation.

WRAPPING UP / AOB

OC – Round up, any further questions? No.

Thanks to all attending.

Meeting ends.