

Whipps Cross Hospital Redevelopment

Planning Application Consultation

Feedback Responses

This document has been prepared to provide a response to the main comments which have emerged as part of the statutory consultation process associated with the determination of planning applications 211455 and 211245.

New Hospital

Capacity of Replacement Hospital

The new hospital will provide the same core NHS services as today, including A&E and maternity. But it will do this in new modern facilities, with more clinical space, providing a better experience for patients and staff. Improvements in care such as providing same day emergency care (SDEC) in a dedicated new SDEC unit to avoid unnecessary admissions, will be supported by a significant expansion in diagnostic activity with over 30,000 more CT and MRI scans over a 10 year period.

The activity and capacity assumptions for the new hospital have been undertaken on a 10 year period to 2028/29 and have taken into account population growth and the impact of improvements in health and care services both in the hospital and in primary care and community services. These assumptions are aligned with North East London Health and Care Partnership activity and capacity plans and have been reviewed in the light of the Covid pandemic.

Barts Health NHS Trust continues to work very closely with local health and social care partners in a system approach to the planning and delivery of this work in order to secure the improvements for local communities over the years to come.

The new hospital is key to the delivery of these service improvements with more clinical space than today, all new clinical departments with services co-located together in the same building and new digital technology in every part of the hospital. There is flexibility in the plans – both in the hospital design and the site masterplan – to add further clinical capacity in the future, including increasing the number of hospital beds if that is necessary.

The new hospital will continue to deliver high quality specialist palliative and end-of-life care. The Trust are undertaking a clinically-led review of the model of care, including how they organise the provision of specialist palliative care and end-of-life care in the new Whipps Cross Hospital and the wider Whipps Cross catchment area, all informed by the engagement and support of patients and local interest groups.

Future Activity Assumptions

Activity and capacity modelling for the new hospital was undertaken on a 10 year horizon up to 2028/29. The key outputs from the modelling were published in September 2020 in *Building a Brighter Future for Whipps – Moving to the next stage*. In projecting future activity, the Trust took into account expected population growth for the Whipps Cross catchment area (of around 11% - with around a 25% increase expected in over 65s) set against the anticipated improvements in care delivery both in the hospital and in primary care and community services.

The assumptions for the impact of future delivery of improved care models are based on stretching but realistic ambitions that both the hospital and the local health and care system can achieve. Taken together, it is expected that these improvements will reduce the number of bed days needing to be spent in hospital - including a reduction of over 10% non-elective bed days. More detail on the Trust's methodology, including the peer groups used for benchmarking, can be found on the Barts Health NHS Trust website.

In Summer 2020, after the first pandemic peak, the Trust's clinicians completed a review into the original Health and Care Services strategy to assess the need for any changes to the models of care envisaged as a result of our Covid-19 experience. As part of this the activity projections were also reviewed. This confirmed that the projected activity assumptions remained reasonable and that the experience of the Covid-19 pandemic reinforced the direction of travel we envisaged for Whipps Cross.

The Trust have also worked with local system partners to ensure alignment of assumptions. A review was commissioned to ensure alignment of system-wide activity and capacity modelling across northeast London – including the Barking, Havering and Redbridge (BHR) system. This included a review of our maternity activity projections based on more up-to-date data, so our updated modelling shows a lower projected number of births at Whipps Cross (4,537 deliveries) compared with our previous modelling (5,783 deliveries).

A system approach to delivering improved health and care services in North East London

The Trust will improve the way services are delivered in the hospital to help avoid unnecessary admissions. For unplanned care a new dedicated same day emergency care unit, supported by significant increases in diagnostic activity over a 10 year period up to 2028/29 with over 30,000 more CT and MRI scans and a near doubling of the number of CT and MRI scanners. For planned care around 10,000 more day case surgeries will be undertaken, with a near 50% increase in day case spaces. There will be 30,000 more outpatient procedures undertaken and 25,000 more outpatient consultations. 50% of all outpatient appointments will be digital.

The Trust anticipate reductions in length of stay for patients receiving elective surgical procedures and orthopaedics in line with the NHS Right Care benchmarks. In hospital efficiencies to deliver these reductions in length of stay include increased capacity in diagnostics to enable faster diagnosis of conditions and earlier commencement of therapies.

The Trust's local partners are improving primary care and community services, supported by increased investment. For example, primary care in Redbridge will see an increase in investment of £9 million by 2023/24. The BHR health system's falls service for complex patients is one of a range of initiatives involving GPs, hospital staff, care homes and Councils' social care teams that have resulted in a 25% reduction in the number of BHR residents taken to hospital by ambulance, with a reduction of approximately 1,000 Emergency Department (ED) attendances and around 270 emergency admissions each year.

A key strength of the programme has been - and continues to be – the Trust's close working with local partners across northeast London including local clinical commissioners, providers and local Borough Councils. This has included the convening of system-wide forums to discuss and oversee the redevelopment of Whipps Cross Hospital, such as the strategic partnership board, chaired by Alwen Williams, Barts Health Group Chief Executive, and including representation from the BHR system.

The Trust will continue to work with our partners in the North East London Health and Care Partnership on the planning and delivery of both in-hospital and primary care and community services transformation required over the coming years, supported by a Clinical and Professional Advisory Group (CPAG) bringing together clinical and professional leaders from across our health and care system.

A new hospital designed to meet future demand

The condition of the current Whipps Cross leads to increased safety risks for patients, negatively impacts on privacy, dignity and infection control as well as on patient and staff experience of the hospital environment. Over 40% of the estate pre-dates the NHS and 80% of the estate is rated as significant risk or high risk. The new hospital is designed to treat and care for people more effectively, incorporate new technology and new equipment as well as allowing us to expand further in the future if necessary to meet health needs.

There will be more clinical space in the new hospital than today, with over 70% of the new hospital devoted to clinical activities, compared to around 50% today and over 70% single rooms compared to 17% today. The new hospital will help the Trust to manage bed capacity much more effectively to deal with short term pressures, for example a new digital command centre, giving real time data on patient flow, minimising the time between admission and discharge.

The new hospital's flexible design and the additional space identified on the site next to the hospital means that the Trust can adapt their plans to increase the number of beds if necessary. For example the hospital design allows for office space to be converted into ward space, with the opportunity to create a new ward. Moreover, two zones of additional space have been identified next to the hospital for potential future expansion, providing physical links back into the hospital at high level, enabling further bed capacity to be added if necessary. This means the new hospital will make the Trust more resilient in being able to deal with events such as another pandemic.

Specialist Palliative and End of Life Care

The Trust recognise that the Margaret Centre's role in the delivery of care and its future generates considerable interest among local people and their elected representatives. That is why the Trust are undertaking a clinically-led review of the model of care, including how to organise the provision of specialist palliative care and end-of-life care in the new Whipps Cross Hospital, all informed by the engagement and support of patients and local interest groups.

The review is looking at the models of care both in the hospital and in community settings, including in people's homes. The work is making sure that clinical staff and service users, including from Redbridge, have the opportunity to shape the thinking moving forward.

The key output of this work will be a clear and compelling vision for how specialist palliative and end-of-life care will continue to be transformed to benefit patients across the Whipps Cross Hospital catchment area. No decision has yet been taken on the precise future of the Margaret Centre.

Woodbury Unit

The Woodbury Unit is not being considered for redevelopment as part of these planning applications, nor is the site of the Woodbury Unit within the red line site boundary of either application.

Heritage

LBWF requested that a non-verified view be produced to demonstrate the view from the boundary of Snaresbrook Crown Court. This view was produced and confirms, as originally set out, that the effect on Snaresbrook Crown Court would be negligible (adverse) with this high sensitivity of receptor resulting in a slight residual effect (not significant). The view demonstrates that the majority of the development does indeed sit below the treeline.

Construction

Adverse effects during the construction phase of development depending on the piling technique that will be used

It is not anticipated that the contractor will want to use these techniques given experience from other urban building sites. Full details of the piling techniques once known will be provided as part of the Construction Environmental Management Plan at Reserved Matters stage. The design team are happy that this matter is conditioned to limit the use of high impact air and/or diesel hammers.

Clarification of vehicle access to the development site during the construction phases and once the development is completed

Similar to the above, construction routes as well as access / egress options are currently being considered and continued dialogue will be required to resolve this matter. The solution will be agreed with LBWF officers at Reserved Matters stage.

Highways, Safe Access and Transport

Improvements to bus accessibility

It is accepted that the most appropriate way to mitigate the reduction in car parking as well as the additional demand is to improve bus accessibility. Allowances have been made for the removal of the existing low level bridge to accommodate double decker buses running through the site, as well as space for stops along the bus route through the Masterplan. Discussions are ongoing with TfL to agree the appropriate contribution to secure an uplift in bus provision/capacity (either through additional services or rerouting buses through the redeveloped site).

Improved walking and cycling access to address personal safety concerns

Active travel is a key focus of the design of the new Whipps Cross neighbourhood and requires good quality lighting to ensure that the design meets local policy and the requirements of Healthy Streets. The lighting strategy has been carefully considered to create a safe environment for pedestrians and cyclists whilst not disturbing local residents and wildlife with excessive lux levels. Lighting strategies to routes to the east of the site have been developed to illuminate the Hospital Road access and footpath to the bus stand whilst balancing light spill to the woodland which surrounds these access points.

Sharing of new routes by pedestrians and cyclists

The new routes into the site which have been designated as pedestrian and cycle will align with the London Cycling Design Standards and the Healthy Streets for London principles. This includes providing routes that have segregated cycle and pedestrian separated from roads to ensure that they are safe and accessible with regular well signposted crossing points throughout and especially close to hospital access points.

Mobility Hub Details

It should be noted that at this point in time there is no detail on the Mobility Hub and there is little guidance on what should be provided within these facilities. The project team will work with TfL to reach an agreement on what is provided here. Likely provisions include:

- Cycle/ scooter hire;
- Covered visitor cycle parking spaces;

- Cycle pump and tool station;
- Legible London wayfinding signage;
- Parcel lockers;
- Coffee stand/ market pitch; and
- Covered bus stops located opposite the hospital.

Environmental Mitigation

Request that Ecological Mitigation (SANG/SAMM contributions) in relation to Hybrid Application 2 is secured in perpetuity

This discussion is currently ongoing with Natural England, the Corporation of London and officers at LBWF to determine the length of time to which 'perpetuity' relates.

Discrepancy between the mitigation put forward within the ES and the document to inform the HRA

Due to the time constraints in receiving and interpreting the AQ data, a discrepancy arose between the mitigation put forward within the ES and the document to inform the HRA. We can confirm that the mitigation set out in the HRA should be the approach to take, and any residual effects will be negligible. This is an amendment to the recommendations and conclusions in the ES Chapter 8 and the relevant chapter is being updated and resubmitted to reflect this change.

Air pollution – Adverse Impact

The following range of mitigation measures relating to the management of Epping Forest SAC, during the operational phase of the proposed development are set out in the Information to Inform a HRA, submitted as a supporting planning document.

Measures can be taken to remove nitrogen from habitats during restoration activities as summarised in a report commissioned by Natural England into the range of techniques employed in restoration activities.

- Removing surface level vegetation, thus removing biomass from the area is widely recognised as an option for restoring habitats and removing nutrients. This can be undertaken by grazing, burning or cutting/ mowing. Owing to the location of the habitat where impacts are predicted (adjacent to a road with no enclosures), grazing and/ or burning of vegetation are not considered appropriate.
- Cutting/ mowing the area within 10m of the SAC boundary, extended further into the designated site, if appropriate, three or four times a year and removing all arisings will contribute to returning the soils to a nitrogen neutral state, allowing acid grassland/heathland communities to recolonise, ideally from the existing seedbank further into the SAC. The management of the area will fall to the Conservators of Epping Forest and details are likely to be included in a Nitrogen Action Plan, the planned production of which is noted in the SIP for Epping Forest SAC.
- Monitoring of habitat restoration is a key part of the overarching mitigation strategy for the Epping Forest SAC (LUC, 2020) and habitat management regimes will take an adaptive approach to establish where localised shortcomings are experienced.
- It is considered therefore that the small, localised effect from increased air pollution caused by an increase in traffic flow during operation can be adequately mitigated, such that no LSE is predicted.

Concern over impact of new population on Epping Forest Special Area of Conservation (EFSAC)

(Impacts of particular concern include: trampling of vegetation, soil compaction, increased dog faeces in the Forest's low-nutrient habitats, and proliferation of pathways increasing regularity of disturbance to wildlife, especially breeding birds. A likely increase in the frequency of accidental/deliberate wildfires and littering/fly-

tipping in the area are also of considerable concern, as is the impact on the sustainable re-establishment of grazing for habitat conservation management)

The Ecological Mitigation Strategy addresses these concerns by:

- Providing forest rangers
- Improving and creating pathways within the SAC and non-SAC land
- Installation of dog bins
- Signage/interpretation
- Improving degraded habitat around Hollow Ponds and Eagle Pond
- Encouraging/improving access via mini-Holland scheme
- Restricting access to acid grassland habitat to allow recovery and prevent further damage

Providing facilities within the Proposed Development site (food outlets, toilets, play areas, greenspace).

Greenspace deficiency

The proposals show provision in excess of 5ha as illustrated on drawing WXH-FIR-HH-ZZ-DR-L-002 REV P05.

The external space provision has been design based on two calculators provided to the design team. One provided by Walthamstow Forest Council for amenity space requirements and also the GLA play space calculator for the total informal and formal play space. The proposed scheme complies with both calculator requirements and exceeds the figures required in the amenity space calculator (total play space proposed = 8903sqm). In addition the area calculations do not include the hospital courtyards which will further enhance the provision.

The design provides a hierarchy of spaces that create a diverse range of routes and amenity provision. These are illustrated on the landscape parameter plan. These areas contain a variety of different types of green space typologies and include woodland, amenity planting and open grassland paths, wetland basins and informal and formal play.

The proposed Chapel Park is over 0.8ha in total including planting, paths, lawn and rain gardens.

Daylight for greenspace and wildlife

Different conditions will allow for a greater diversity of plants to be used which will provide more interest and help differentiate the various character areas. Our experience of planting over the past 40 years allows us to draw upon our understanding of an extensive range of species to plant each area successfully to enhance people's enjoyment of the site. There are many exemplar projects built recently where this approach has been very successful.

Landscape design would be appropriate to the predicted conditions across the proposed development. The main aim of the on-site greenspaces is to provide an attractive environment for recreation and retain people on site. The primary areas for wildlife of Fille Brook and Forest Park are not predicted to be overshadowed to any significant degree.

Trees – CAVAT Assessment

The council have undertaken the CAVAT assessment and the resultant value has been split proportionally between the two application sites.

Wind effects on wildlife

Preliminary wind modelling has identified a few areas which require further microclimate mitigation. These will be addressed at the Reserved Matters stage and are largely expected to be addressed through the façade and landscape design.

Where possible green roofs will be incorporated in line with the urban greening priorities of the London Plan, with green / blue roofs planned to be used for both water attenuation and biodiversity gain. Some roofs will also provide amenity space. This will be included in the Reserved Matters Applications.

Residential Development

Principle of Development

The proposed Local Plan Submission Version 'Vision for the South' states 'Whipps Cross will be an important community hub, centring on an improved and upgraded state-of-the-art hospital, supporting community and health services and new, quality homes'. Policy 9 (South Waltham Forest) states that the Whipps Cross Strategic Site Allocation should deliver a minimum of 1700 new homes. 'Shaping the Borough - Waltham Forest Local Plan, Draft Site Allocations Document (LP2), September 2020' seeks to allocate the existing hospital site in particular for the delivery a minimum of 1500 homes.

It is considered that the development complies with Policy 83 A-C (which seeks to protect the forest from development) since the strategic package of mitigation strategies proposed will contribute to the mitigation of development impacts on the SAC via the provision of SANGS (Suitable Alternative Natural Green Space) as set out in the Council's Mitigating the Impact of Development on SAC/SPA SPD.

The planning applications are accompanied by a HRA that demonstrates that the development will not generate adverse urban effects on the integrity of the SAC.

Scale of residential development proposals

The scale of development has been carefully considered in relation to our important neighbour Epping Forest and the neighbouring residential context within which the development sits.

The proposals will see the removal of existing large scale healthcare buildings such as the emergency department which sits alongside the boundary with the ancient woodland. A buffer will be created along this edge with residential development aligned with the existing Edwardian ward block end pavilions which overlook the Forest.

Existing car parking and unsightly cabins which sit to the south east of the Edwardian ward block pavilions will be removed and later living homes serving residents who may wish to downsize in the area provided in their place.

Careful consideration has been given to placemaking along the eastern edge of the site with the creation of Forest Park which will provide opportunities for play, exercise and reflection within a woodland setting. The access road along this edge has been further set back to allow more area to be greened and contribute to onsite amenity for residents, patients, staff and visitors.

Need for family sized affordable housing

Both the 1500 unit and 1355 unit scenarios are illustrative of the residential developments which could be brought forward within the proposed parameters. The exact quantum and mix of units will be secured

through future subsequent Reserved Matters planning application. In both indicative schemes 50% affordable housing is proposed with a policy compliant tenure split (70/30% social/intermediate).

Within the current design parameters, if the scheme complies with the emerging mix of unit sizes (in accordance with emerging Local Plan Policy 15 - that is the desired mix of 1, 2, 3 and 4 bed homes), the number of units which can be accommodated within the parameter is less than 1500 (larger 4 bed homes utilise more floorspace than smaller units).

Affordability

The proposed low-cost rent levels would be in line with social rent or London Affordable Rent levels (as per GLA policy). Details will be secured through the future Reserved Matters application.

An early stage review will not be required since the proposal is fully compliant with affordable housing policy and guidance. Planning conditions/obligations will secure this provision in line with the proposed level of affordable housing provision.

Residential Quality

The design has been developed to provide the following:

- All proposed homes including later living meet the internal space standards contained within the London Plan and the Housing SPG
- Minimum floor to ceiling heights are in line with London Plan requirements with a minimum ceiling height of 2.5m for at least 75% of the gross internal area
- All homes have access to a private balcony or terrace
- Residential cores serve no more than 8 homes
- Dual aspect homes have been maximised with no north facing single aspect homes

The Design Code has been updated to reflect this and will form part of the material to be reconsulted upon.

Tall Buildings – Treatment

Indicative details of the treatment of tall buildings have been included in an addendum to the Design Code which forms part of the material for reconsultation.

Tall Buildings – Functional Impacts

Outline plots have been designed with consideration of internal and external design, construction detailing and materials ensuring safety of all occupants. Furthermore, servicing and maintenance of individual plots have been considered from the outset ensuring safety of all occupants and users whilst minimising disturbance and inconvenience to public realm and residents. Access routes, entrances and ground floor uses have been situated to allow easy access, peak time use and to ensure there are no isolated areas or overcrowding.

The development also has the required capacity to facilitate not only the new hospital but also the increasing number of residents to the area. This is facilitated through a transport network and infrastructure accommodating long and short stay cycle spaces, blue badge parking, two multi-storey car parks and a mobility hub that houses cycle and scooter hire.

Not only does the development provide a considerable uplift in greenery, landscape and public realm, but there is also a significant provision of amenity, community uses, retail and economic activity that will help support the regeneration of the area and could act as a catalyst for future change in the area.

Updated Fire Statements

Fire statements have been submitted with both applications. These will be further developed and submitted to LBWF for further approval at RMA stage. London Fire Brigade have been consulted as part of the statutory consultation and have confirmed they are satisfied and will make further comment at RMA stage.