

Wren Conservation Group
c/o 19 Barclay Road
Leytonstone
E11 3DQ

Mr Graeme Doshi-Smith
Chairman of the Epping Forest & Commons Committee
Members' Room
PO Box 270
Guildhall
London
EC2P 2EJ

31 July 2019

Dear Mr Doshi-Smith,

We are writing to express our serious concern about the basis on which the preliminary ecological appraisal or impact assessment ('EIA') was conducted for the proposed large scale concert for Wanstead Flats.

As you know, the Wren Conservation Group has expressed its opposition to the proposed large-scale concert/music festival as it has been proposed in different iterations over the last few months. We are concerned about the potential long-term damage to habitats and to key species found on the Wanstead Flats as a result of the disruption and damage that we feel may well be caused by c50,000 festival goers, especially as they arrive and leave from the concert/festival.

We noted that at the Guildhall meeting of the Epping Forest and Commons Committee on 8 July 2019, the Committee voted in favour of the advancement of the plans to hold the large-scale event following the presentation of the summary of findings from the Preliminary EIA.

We would like to make clear that we do not question the professionalism and good intentions of the consultancy that carried out the assessment, nor do we have any major problems with the general findings as they relate to the precise footprint of the proposed event (although we do have some specific concerns which we have set out further below in our letter).

Our material and profound concerns centre around the fact that there does not appear to have been any consideration of the ecological impact of c50,000 attendees arriving and leaving from the event, especially if it is to be held over more than one day. We have no doubt that concert goers will be encouraged to arrive and exit from the event via roads and pavements, but we are more than a little sceptical that so many people, whilst in the party spirit, will follow such instructions unless huge sections of the Wanstead Flats are secured with high level fencing and patrolled by very large numbers of security staff.

Whilst the preliminary EIA finds that the impact on the footprint of the event, largely football pitches, would be limited, it does not seem to have been commissioned to consider any peripheral impact whatsoever. The main routes from the three local key public transport hubs would all involve walking across parts of the Wanstead Flats. Just three of these possible walking routes have been drawn on the map enclosed below - these would cross, or come close to, key areas of grassland habitat (including both remaining Skylark breeding grounds), scrub habitats, and the SSSI. On an already stressed environment with a small-scale mosaic of habitats, the event could significantly increase the stress level.

With no consideration of any impact other than the precise footprint of the event, we believe that, at best, the assessment is rendered inadequate.

For these reasons, we believe the vote should be nullified as it was carried out on the basis of incomplete, and effectively incorrect, information. Even if MAMA conduct a further ecological assessment further down the line, we do not believe that a vote based on such an incomplete picture can, or should, stand and the CoL Epping Forest should commission a new EIA before making a decision to proceed further or not.

A new EIA should include consideration of peripheral impacts, likely entrance and exit routes, fire risk in nearby long grass areas (if people camp, barbecue, discard cigarettes etc and especially given the recent massive fire we experienced locally), likely overspill and after-parties, etc.

Furthermore, if a new EIA is commissioned, with the broader footprint impact under consideration, we would also suggest:

- That a bat survey should be carried out over more than one visit. We know that a number of protected bat species can be found very close indeed to the proposed site.
- We find it somewhat extraordinary that only two species of bird were found during the survey; evidence surely that more than one site visit should be conducted, and of the need for a broader impact assessment.
- Even given the extremely narrow scope of the survey, we find it surprising that there was no mention of the Creeping Willow (*Salix repens*) which is growing very close nearby.

We are aware that when concerns around impact outside the immediate footprint of the event have been raised in the recent past, comparisons have been made with other events held on the Flats such as the annual firework display. We believe this comparison is flawed to the point of being deeply misleading. The firework display is many times smaller, held on a different site, is held for a much shorter period, it is family-focused, the attendees are mostly likely to be local and familiar with the habitats, and it is held during the late autumn/winter rather than the summer months.

As the Wren Group has made clear before, we have seen evidence, in the recent past, of significant, and permanent, damage being done to local, protected species of wildlife from temporary events and activities (the fact that Skylark have never bred again in the area south of

the SSSI after the presence of the police muster station during the 2012 Olympics, precisely as the Wren Group warned and feared is just one example). As a group which carries out many hundreds of hours of wildlife surveying and observations on the local area every year, it is our view that the proposed event could have very material negative impacts on the local biodiversity. We, therefore, believe it to be essential that any official EIA is carried out on accurate and thorough basis.

Given the magnitude of the issue and gravity of the concerns that we have regarding this issue, you will see that we are copying this public letter to a number of relevant local stakeholders as well as the local press.

We hope you understand the basis for our concern, but we also wish you to know that we stand ready and willing to continue to assist you, in any way we can, through the process of consideration as to whether such an event is suitable or not.

Yours sincerely,



Wren Conservation Group committee members

James Heal – Chair
Kathy Baker
Moiria Duhig
Mark Gorman
Tim Harris
Mary Holden
Alan James
Gill James
Jackie Morrison
Tony Morrison
Mirza Rashid
Simon Raper
Bob Vaughan

cc. Rt Hon the Lord Mayor of the City of London, Superintendent of Epping Forest Paul Thompson, John Cryer MP, Lyn Brown MP, Stephen Timms MP, Mike Gapes MP, Wes Streeting MP, Councillor Daniel Morgan-Thomas, Councillor Paul Donovan, Councillor Jo Blackman, Councillor Sheila Bain, Councillor Paul Merry, Councillor John Howard, Councillor Jas Athwal, Councillor Clyde Loakes, Councillor Marie Pye, Councillor Jenny Gray, Councillor Sally Littlejohn, Councillor Patrick Edwards, Councillor Keith Rayner, Councillor Ken Clark, Councillor Mariam Dawood, Councillor Salim Patel, Councillor Sasha Dasgupta, Councillor Anamul Islam, Councillor Rachel Tripp, Officer Ed Chaplin, Borough Commander Sanjay Prasad.

