



9th November 2023

Planning application Waltham Forest 231076 - The County Hotel, 30 Oak Hill, Woodford Green, IG8 9NY. Demolition of the existing hotel building (Use Class C1) and erection of a care home (Use Class C2) and ancillary communal facilities together with a reconfigured vehicular access onto Oak Hill and associated parking, landscaping and amenity space provision.

Epping Forest Heritage Trust

Epping Forest Heritage Trust (EFHT) is a membership organisation and charity dedicated to preserving and protecting Epping Forest, its flora, fauna, culture and heritage for people to enjoy now, and for generations to come. Our 1,000 plus members largely live in the various communities throughout the Epping Forest area. We have been engaged with and committed to the Forest for over 60 years and are a member of the Epping Forest Consultative Group run by the City of London Corporation.

Epping Forest is a hugely important ancient Forest, much of which is both a Site of Special Scientific Interest (SSSI) and a Special Area of Conservation (SAC), with iron age camps, 1,000 year-old trees and rare wood pasture habitat and species. It now faces the gravest threats that it has seen since it was first protected by the 1878 Epping Forest Act. Climate change, increasing levels of pollution and the acceleration of nearby developments have led to a reduction in the biodiversity of the Forest (flora and fauna). Neighbouring development, including plans to build 68,000 housing units in its vicinity, already threaten its resilience to

pollution. Anticipated increased visitor numbers and budget cuts mean conservation, habitat improvement and maintenance are curtailed, and biodiversity is reduced.

At the same time the Forest has the potential to help us tackle the crucial issues of our time: it helps us tackle climate change by reducing temperatures and capturing carbon; it provides a vital amenity for people's health and wellbeing as a space to walk, cycle, ride, relax and enjoy.

It is therefore essential that we protect and preserve the Forest not just for our own current enjoyment, but also for generations to come, and for the sake of the planet.

That is why we have the following concerns in relation to the above application.

The re-development of the County Hotel site represents a significant development given its location in the middle of the Forest in the area known as "Walthamstow Forest".

We recognise that the re-development of the hotel into a care home, given the age of the residents, is unlikely to result in significant increased footfall within the Forest. We also recognise that it is unlikely to result in a significant net increase in vehicle traffic, once construction is complete, despite the increase in the number of bedrooms and larger number of staff required at a care home.

However, the development would lead to the creation of a larger building on the site, overall, with a greater footprint compared to the existing hotel and with the whole building being four storeys high. We note the screening proposals etc., and the conclusions of the Landscape and Visual Aspect assessment, but feel that there will be some detriment to the visual amenity of the Forest given the location of the site.

While we do not object, in principle, to the redevelopment, or re-use, of the site, since it has already been built upon, its sensitive location, immediately adjacent to, and surrounded on all sides by Forest land, raises concerns about protection of that land, including nearby mature trees, in particular during the construction phase.

We are not convinced that the Construction Environmental Management Plan nor the Habitats Regulations Assessment adequately take into account, or do not provide sufficient detail to provide reassurance, that the risk presented by the immediate proximity of the Forest SAC/SSSI on all sides of the site has been recognised.

The provision of hoarding will not necessarily stop dust and other pollutants from entering the Forest, particularly where trees are present which are taller than the hoarding. And there does not appear to be much detail about the measures needed to prevent run off of chemicals or liquid building materials from the site which could very quickly flow into and contaminate the Forest.

We ask that the provision of more detail on mitigation, before construction starts, is set as a condition, if approved.

We welcome the undertakings on Biodiversity Net Gain and maintenance of a 15m buffer from the ancient woodland and other screening, but are concerned about aspects of the proposed removal of 16 trees and a hedgerow. The supporting documents state that some of these trees may be present along the site boundary and, as such, their canopy area and Root Protection Area (RPA) may be present off site. We would welcome clarification whether the canopy or RPA of any of the trees earmarked for removal are within the Epping Forest SAC, and, if so, how will damage be avoided?

We also note the potential presence of bats and Great Crested Newts on the site and the need for further assessments, or the publication of the results of those assessments, and the provision of mitigation as necessary.

Lastly, we are not clear whether the Strategic Access Management and Monitoring Strategy is already in place and applies to care home provision and whether the developers will be required to make a financial contribution to the City of London Corporation as Conservators of the Forest for mitigation measures. We hope it is in place, and a mitigation payment will be made, which could be used to fund the maintenance of paths in the vicinity of the proposed care home.

EFHT hopes that the above comments are of use to the Council and will support them in making their decision.

We believe the above issues are significant and need to be addressed.

Yours faithfully

Peter Lewis

Chief Executive