



**Epping Forest
Heritage Trust**

19th December 2023

Planning application – EPF/2596/23 - Land at West Essex Golf Club and Netherhouse Farm, Bury Road, Chingford, E4 7QL - Construction of 10.7MWp Photovoltaic solar farm and associated infrastructure, including sub-station, cabinets, fencing, access tracks and grid connection.

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 object to this application because:

- **It represents an inappropriate development within the Green Belt.**
- **It does not meet the “very special circumstances” required to justify the exceptional approval of development within the Green Belt.**
- **The proximity of the Forest SAC and buffer land does not appear to have been fully reflected in the landscape and ecological assessments.**

The Trust recognises the need for renewable energy, but such developments should not be to the detriment of the countryside. This proposal will adversely affect Epping Forest by introducing industrial structures over a significant area close to both Forest buffer land and to the SAC. A number of Trust members have also raised concerns directly with us about the proposals.

The National Planning Policy Framework (NPPF) is clear that development, with exceptions, is inappropriate in the Green Belt. We do not see how the proposal meets the “very special circumstances” specified in the National Planning Policy Framework (paragraphs 147, 148 and 151), or related local planning policies, such as to override the presumption against development in the Green Belt. Solar panels would be more appropriately fitted to the thousands of new builds planned for the Epping Forest District over the next few years or on sites further away from the Forest. And the proposed Biodiversity Net Gain, covered below, does not justify the installation of industrial structures so close to Forest land.

In addition, the land is not zoned for renewable energy development in the adopted Local Plan, noting that Epping Forest District Council (EFDC) policy DM20 recognises that ad hoc requests will be made. In light of this, a Council policy on the siting of renewable energy industrial structures in the Green Belt close to Forest land would be beneficial and provide clarity to developers and the public, as was discussed in June 2023 when considering application EPF/1974/22.

The proposal does not appear to fully recognise, or fully take into account in the supporting ecological documentation, the proximity of the Forest SAC to the West Essex Golf Club site, which is some 250m away, and that the landscape between the sites, Fernhill, is Forest buffer land. In the case of the golf club site, given its proximity to the SAC, we would have expected a shadow HRA to have been prepared to assist the Council.

The Landscape and Visual Appraisal does not appear to consider fully the visual impacts of the solar farms from the Fernhill buffer land itself and the possible impact upon views from the Forest, for example, High Beach, of the solar panels. Nor does it consider the

detrimental impact the solar panels will have on views of the Forest. In addition, despite screening, the deer fencing may be visible and intrusive, and we note the Essex Police comment about the possible need for more secure, presumably more intrusive, fencing to counter theft.

We have a number of other concerns:

- The 40-year long term effects of the installation of PV modules is not known which, given the proximity of the Forest, risks the contamination of the soil and nearby water courses in the SAC which is protected by both national and EFDC policies. Studies covering one year will not necessarily identify or encounter problems which may emerge over decades and therefore cannot, in our view, be regarded as reliable indicators.
- The “Justifying Inappropriate Development in the Green Belt” section in the Planning statement refers to a “...huge increase across the site.” of Biodiversity Net Gain (BNG), and the Biodiversity Management Plan refer to large increases in biodiversity above the +10% requirement. We note that this is not quantified, there is no detailed assessment of how it will be achieved and of what percentage will be obtained. While we note that BNG can be achieved we do not accept that it will be of such a level as to justify development in protected Green Belt. As mentioned above, we are also concerned about the lack of information on the longer-term effects and their possible effect on biodiversity.

- The site at Netherhouse Farm, north of Barn Hill, appears to be partially blocked to the south by the hill itself and an array located there would appear likely to be sub-optimal in capturing sunlight.
- There is limited information on sustainable transport and the provision of EV charging points at both the Golf course and the crematorium.

We believe the above issues are significant and need to be taken into account by the planning authority as it considers the above application.

Yours faithfully

Peter Lewis

Chief Executive

Epping Forest Heritage Trust