



**Epping Forest
Heritage Trust**

28th August 2025

Planning Application – EPF/1428/25 - Land at Upland Road, Upland Road, Epping - The

construction and operation of a solar photovoltaic ('PV') farm (up to 49.9 MW) and associated infrastructure, including inverters, DNO Substation, Customer Switchgear, cable connection, security cameras, fencing, access tracks and landscaping

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, nearly all 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, the acceleration of nearby developments and increased visitor numbers have led to a reduction in the biodiversity of the Forest (flora and fauna). Future development, including plans to build 68,000 housing units in its vicinity,

further threaten its resilience through anticipated increases in visitor numbers and pollution. In addition, budget cuts have meant that 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.

This is why we object to this application:

- **We believe that the proposal represents inappropriate development which is, by definition, harmful to the Green Belt and that Very Special Circumstances do not exist to outweigh this damage.**
- **The designation of the site as Grey Belt is incorrect as the site contributes strongly to Green Belt Purposes (a) to check the unrestricted sprawl of large built-up areas and (b) to prevent neighbouring towns merging into one another.**
- **There would be a negative impact on the Epping Forest SAC-SSSI as the loss of open countryside and the installation of industrial structures will result in increased use of the Forest SAC and SSSI and consequent damage.**

- **The cumulative impact of the large number of solar farm developments and proposals on the Green Belt and on the Epping Forest SAC-SSSI needs to be assessed and it would be beneficial if the EFDC would develop a specific policy on the siting of such developments.**
- **The risk of pollution, including from fires, needs to be assessed including the possible impact on Corporation of London Complementary/Buffer Lands if pollution were to travel along Cobbins Brook.**

We note that the proposal is for a solar farm of some 96 hectares consisting of 3m high panels, that site is in the Green Belt, is in an area not designated for development in the adopted Local Plan and is close, approximately 1km, to the Epping Forest SSSI and is some 700m away to the north from the proposed Latton Priory development of a minimum of 1,050 homes and associated infrastructure.

Inappropriate development in the Green Belt

The site is in the Green Belt and not designated for development in the adopted Local Plan. Given this, and in accordance with paragraph 153 of the National Planning Policy Framework (NPPF), **we believe that the proposal represents inappropriate development which is, by definition, harmful to the Green Belt.** The installation of what are industrial structures over such a large area would seriously compromise the openness of the Green Belt.

The proposal does not fall within any of the exemptions in paragraph 154 of the NPPF, nor do we believe that Very Special Circumstances apply to this case to outweigh the damage, and other factors. Whether the use of the land for solar power is temporary cannot be

determined when any decision on the site's future will be made in 40 years' time when circumstances may have changed. Moreover, we do not accept the developer's contention that there are no alternative sites available in the district in more suitable locations.

Grey Belt designation incorrect

We do not accept the argument made by the developers that the site constitutes "grey belt" land and believe that the site contributes strongly to two of the Green Belt Purposes:

- (a) to check the unrestricted sprawl of large built-up areas;
- (b) to prevent neighbouring towns merging into one another.

Purpose a. Epping lies to the south of the site. Maintenance of the site as part of a wider area of Green Belt and open countryside contributes strongly in our view to ensuring that Epping, a large built-up area, does not extend in an unrestricted residential sprawl into the countryside north of the town.

Similarly, the site strongly contributes to preventing urban sprawl from Harlow to the north. The site's importance, and the value of its contribution to Purpose a., will significantly increase once the Latton Priory development of over 1050 homes and related infrastructure is built some 700m away from the northern end of the site. Once this built, the risk of urban sprawl increases significantly. This is a major factor that needs to be taken fully into account when the "grey belt" status of the site is considered and we note that it does not appear to have been taken into account in the "Green Belt Assessment".

The site itself is largely free of existing development, there are no adjacent physical features which would contain development and development of the area would result in incongruous, piecemeal patterns of development in the Green Belt.

Purpose b. The site also contributes strongly to Purpose b. by preventing the possible merger of Harlow, Epping and potentially an expanding Thornwood (to increase by 172 residences based on the current adopted Local Plan) which lies to the east of the site. The area is free of existing development; it forms a substantial part of the gap between south Harlow and north Epping and its development would likely to result in the loss of visual separation. As mentioned above, the very large Latton Priory development to the south of Harlow of a minimum of 1,050 homes will lead to a reduction in the separation distance between Harlow and Epping making it even more important that the remaining areas separating them remain free of development.

Adverse impact on the Epping Forest SAC/SSSI

While we accept that the proposed solar farm will have a limited direct effect on the Forest SAC-SSSI, we are very concerned that the installation of what are industrial structures (the solar panels themselves, transformers, transmission equipment, 2m high security fencing and other security equipment including CCTV) will reduce the attractiveness of the area, and those adjacent, for recreational use. The Landscape and Visual Impact Assessment states that there are seven Public Rights of Way (PRoW) in close proximity to the site and another six to the north-west of the Site from where there would be various views of the proposed development. Despite any mitigations, there will be a loss of openness and the presence of

industrial structures which is likely to mean that residents, including those from the planned Latton Priory development, would use the Forest for recreational visits and thereby cause additional damage and air pollution to the sensitive Forest habitats contrary to Local Plan Policy DM2 – Epping Forest SAC.

Cumulative Impact of Solar Farm Developments including on Epping Forest

There have been a significant number of solar farm applications in the district over the previous 18 months including Dell House Buckhurst Hill, West Essex and Netherhouse Farm, land south of Waltham Abbey, land east of Tawney Common and now Thornwood. Through the installation of what are industrial structures (as described above), these proposals, and others which may follow, have the potential to have a significant cumulative impact on the openness of the Green Belt and on the landscape character of the area contrary to National Planning policies and Local Plan policies DM4 Green Belt and, in particular, Policy DM3 Landscape Character, Ancient Landscape and Biodiversity. The latter states that:

“Development proposals will be permitted where applicants are able to demonstrate that the proposal will not, directly, indirectly or cumulatively, cause significant harm to landscape character;”

The Trust supports renewable energy initiative but believes such industrial facilities need to be situated in the right place. The Trust’s concern is that the number of recent approved and potential developments may have the cumulative effect of creating a partial ring of what are extensive areas of industrial structures around the north of the Forest SAC-SSSI

making those areas less open and generally less attractive for recreational use. As described above, it would therefore be more likely that residents, with consequent increased visitor footfall, vehicle trips and disturbance, would switch to the more sensitive habitats of the Forest SAC-SSSI contrary to Local Plan Policy DM2 as more local areas outside the Forest become unattractive for recreational use. There is also the possible visual impact of the structures, particularly “glint and glare”, being visible from parts of the Forest as the latter is generally sited on the higher ground.

Need for District Level Renewable Energy Policy

It appears that developers are being encouraged to make what may be speculative applications because the adopted Local Plan, under Policy DM20 Low Carbon and Renewable Energy, did not allocate land for renewable energy development and noted that individual requests would be considered on their merits. In light of the number of solar farm applications in the district, we believe that both the individual and cumulative impacts needs to be considered and a district wide policy on the siting of renewable energy facilities is needed. We note that the need for such a policy was discussed in June 2023 when Councillors considered planning application EPF/1974/22 and agreed that such a policy would be beneficial and provide clarity for both developers and the public.

In addition, the Government’s guidance ([Renewable and low carbon energy](https://www.gov.uk/guidance/renewable-and-low-carbon-energy) <https://www.gov.uk/guidance/renewable-and-low-carbon-energy>) is clear that cumulative effects must be considered:

“...in considering locations, local planning authorities will need to ensure they take into account ...critically, the potential impacts on the local environment, including from [cumulative impacts](#). The views of local communities likely to be affected should be listened to.”

Pollution and Land Contamination Risk

We question how guarantees can be made that no pollution will come from solar panels when a lifespan of 25-30 or more years is envisaged and with the solar farm being operational for 40 years. How can there be certainty that there will not, over time, be chemical leaching into the soil which could, in this case, leak into Cobbins Brook and then run into the complex of Forest Buffer/Complementary Land at Warlies Park? Alongside this there is a risk of fire and, again, pollution from such fires would leach into the soil and run into Cobbins Brook causing pollution downstream. We could see no indication of consideration of these specific risks, nor their mitigation, within the application contrary Policy DM21 Local Environmental Impacts.

Conditions of Approval

Should the application be approved, and given the requested flexible nature of the approval requested, we ask that detailed planning conditions are applied, and monitored, including:

- That there is adequate screening of all structures using native species only in the form of locally characteristic hedges or tree belts;

- Coating of arrays in a non-reflecting material in order to minimise glare and visual impact;
- Reversible construction techniques to permit restoration of the land after decommissioning (i.e. not concrete foundations);
- Visually unobtrusive security fences and CCTV which enable wildlife to pass freely;
- Strict controls on lighting;
- Appropriate vegetation management regimes (e.g. grazing);
- A clearly stipulated decommissioning date and a legal agreement on land restoration measures after decommissioning;
- Appropriate management of traffic during the construction phase to ensure that the traffic volumes through Forest and adjacent roads, **in particular those around the Wintry Wood SSSI**, are limited as far as possible to reduce noise and vehicle pollution in the sensitive Forest SAC-SSSI.

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