NORTH MUNDHAM PARISH COUNCIL
Working for the whole community
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Dear Calum,

24/01859/FUL Solar Farm - Comments

The Parish Council (PC) considers that there are a number of inconsistencies, mistakes and missing information in this application and would like these issues to be resolved and/or clarified before their proper assessment of the application can be completed. It is noted that additional, new information has just recently been posted on the planning website.

Transport Assessment

3.3 Both Runcton Lane and Bowley Lane are required for access under the application (ref WSCC Highways response 19/09/24). The carriageway widths (ie tarmac) have been recently carefully measured as actually varying between 2.8m to 3.2m, and not as claimed by the applicant, ie 3.7m – 4.5m, which is clearly very misleading. Any wider than this is the verge which has been broken down by vehicles passing each other and can in no way be described as 'carriageway' since it has no load bearing capacity. There are indeed 'impromptu' passing places – which are potholed and muddy and also have no load bearing capability. There is a recent and regular history of damaging tyres, wheels and suspension in these places.

5.8 Clearly states that "deliveries …. will be done via farm vehicles".

5.9 This drawing illustrates a "max legal articulated vehicle ……. representative of the largest vehicle that would be used to deliver parts to the site". Is the proposal therefore for 26 tonne containers to be delivered to the sites by articulated HGVs (up to 44T GVW) or by by farm vehicles?

Saltham Grange access road. This privately owned access is a concrete road of width varying between 8ft (2.44m) and 10ft (3.05m), concrete thickness of 4 inches and laid directly onto earth without any other load bearing support. There is a sign for a weight limit of 10T for the bridge over Pagham Rife. The applicant's vehicles are allowed to use it but there is clear evidence of them already exceeding this track width with verges breaking down on both sides of the concrete. The applicant's vehicles are not allowed to drive on the grass verge (ie overlap the concrete carriageway), and Saltham Farm's fence beside the 8ft carriageway has regularly been knocked down by agricultural vehicles. In addition it is understood that the track access onto the E site, where it passes through Saltham Woods, is conserved by covenant to remaining a natural surface ie no reinforcement of any nature is allowed. It is understood that the applicant has not discussed access for this application with the owner of the road and is apparently completely ignoring the real capacity of this road in their proposals. The surface is undulating and forming deep puddles

which reinforces the impression that it is already being overloaded – the road requires a full survey and proper justification by the applicants for the proposed use.

This private access road appears to be completely unsuitable for many of the vehicles proposed in the application and is apparently already being abused by the agricultural vehicle use of the road by the applicant.

WSCC Highways comments 16/09/24: "8 – 12 two way movements per week albeit unclear if this includes all vehicle movements"; "unclear if this includes … aggregate, concrete etc". The PC notes these comments and considers that this lack of clarity is important in terms of the veracity of the application. The application includes outline details of trackway installation within the sites (eg 3.5m wide, 0.2 – 0.5m deep) but does not include any assessed trackway length nor any sizes for hard standing, loading/unloading areas, parking areas, drainage ditches, foundations for inverters/transformers and access splays. Taking ALL of these potential aggregate load requirements into account, how many HGV and/or heavy vehicle movements will actually be required for the complete construction? It is considered that the number of two way movements quoted in the application may be seriously misleading. The application is also opaque about what vehicles will use Runcton/Bowley Lanes and Saltham Grange/Woods accesses – eg HGV, articulated lorries, flatbed trailers and/or farm vehicles; this needs to be be clarified in the application. As far as it can be ascertained at the moment, these lanes/accesses in their present state are not able to accommodate most of these large, heavy vehicles in the probable numbers that will be involved, and the applicant is deficient in negotiating their access over the private roads with the owner.

QUESTION: What vehicles are going to be used where, and how many movements of each class of vehicle are actually involved over what routes in the full construction phase?

The application also glosses over the requirement for intermediate life maintenance trips to replace inverters (life 10 – 15 yrs) and solar panels (life ~20 yrs) which could apparently entail many container loads of parts. This adds significantly to the loading and frequency of heavy traffic over all these roads. The application briefly mentions the dismantling phase but also glosses over the vehicle requirement which could be very similar to the construction phase, including the removal of all the building/aggregate materials, if the site is to be returned to full agricultural use, as is claimed. The provision of a Decommissioning Plan would clarify these questions.

WSCC Highways is requested to undertake a full on-site review/survey of this application at this stage such that further details of the methodology of construction can be requested to enable mitigation for construction related impact to be considered as part of the application. A desk top documentary review is not considered to be satisfactory bearing in mind all of these issues and outstanding questions which we believe bring into question the proposed routing of the construction traffic. For instance a pre-condition highway survey of Runcton/ Bowley Lane and Saltham Grange access is surely required before Highways can effectively comment on the application. Leaving the details to be agreed under Condition and in the subsequent Construction/Transport Management Plan (which will have to cover construction, mid life upgrades and decommissioning) ignores the important issue of the feasibility of the applicant's proposals

which we believe the Planning Committee should address. A suitable Condition could then be advised by Highways once the correct and full information is available.

QUESTION: is there a statutory requirement for carriageway width for this class of road – Runcton/Bowley Lanes?

Environmental Strategy

The PC notes and supports the Council's Ecologist in requesting:

- The submission of a Construction & Ecological Management Plan as part of this application.
- Mitigation strategies for dormice and water voles.

Planning Statement

Executive Summary. The proposal has a 'design output capacity of 30MW$_{AC}$'. Does this figure include the Capacity Factor? In a variety of places in the application different figures are quoted for the likely power output to the grid (eg 36,792,000kWh, 25,500,000kWh, 35,000MWh) and postulated number of 'average' houses that would be powered.

However, nowhere is the number or output of the selected/assumed PV panels stated, nor any of the assumptions that must be used to move from a nominal 'capacity' to actual output power delivered to the grid: eg insolation/irradiance annual profile, system efficiencies, tilt angle, weather assumptions, grid connection limitations (if any) etc. Without this information it is impossible to calculate the accuracy of these various power claims and therefore to assess the veracity of the application.

QUESTION: what are the actual figures for power delivered to the grid connection per annum? What hardware, installation and climate conditions are assumed to enable this power output to be validated or verified?

QUESTION: best practice would appear to require additional ecological information for planning applications with potentially critical climate change impacts; is it CDC policy to request the following for a solar farm application:

A plan for Scope 1, 2 and 3 emissions, together with the relevant mitigation strategies.
Submission of a detailed CO_2e calculation, with annual monitoring and reporting.
Submission of an Environmental, Social and Governance Report.

This additional information would help CDC not only to evaluate the immediate environmental impact of the project, but also to monitor its long term social, environmental and governance performance.

Noise Impact Assessment

The solar string inverters selected are quoted in Table 6.1 as "Sungrow SG3400HV-30/SG3125HV-30". This seems to be the only reference in the application to any of the hardware being proposed/assumed for this installation. Their noise signature is quoted as 83dB L_{Aeq} at 1m,

but this figure does not appear to be available in the public domain spec sheets for that inverter. No information about the transformers is stated, nor any noise mitigation proposed.

"Noise mitigation measures should be implemented … to achieve a 10dB reduction such that noise emissions at 1m do not exceed LAeq 73dB" for the inverters nearest to Keyham and Midfields. But critically, the location of the inverters varies between drawings eg dwg 'Operational Noise Level' and 'Illustrative Landscape Masterplan' 1047-MP-07.

QUESTION: what are the correct locations of all of the inverters and transformers in this application? Will the transformers require any noise mitigation?

Saltham Grange overlaps the 35dB line from the northern inverter on the eastern site as depicted on the 'Operational Noise Levels' dwg. This suggests that the occupants could suffer excessive noise from that inverter which would not be satisfactory. There are also paddocks for young horses immediately to the E of the property which are inside the noise circle.

QUESTION: will noise mitigation measures be implemented for any other inverters than currently proposed?

Glint & Glare

There is a grass airstrip 1.5km S of the site, adjacent to North Honer Farm, with the runway running approximately E – W immediately to the E of the Farm inside the loop of the Pagham Rife. The proximity and attitude of this regularly utilised airstrip suggests that an aviation safety assessment should be carried out by the applicants to ensure that there are no safety issues with these aircraft operations.
There is no assessment of G&G from the solar panels on any adjacent properties which seems to be a lacuna.

QUESTION: will aviation safety and local housing G&G assessments be undertaken by the applicant?

Statement of Community Involvement

It is understood that the applicants have not consulted the adjacent Parish Council about this application.

Road Names/Signage

There is general confusion about the names of roads around S Mundham (eg Google Maps and others) compared to the road signs. Unfortunately the application has used different naming conventions in different documents which is misleading and confusing. As far as the PC is concerned the following should apply, recognising the road name signs that are in place:

Runcton Lane comes S to Camic Pond and then turns W to the junction with Manor Lane at S Mundham Barns where it terminates.

Bowley Lane starts at Camic Pond (road sign in place) and then goes S all the way to the dead end at Bowley Farm.

Punches Lane starts at the S Mundham triangle, junction of Manor Lane and Honer Lane, and heads E to the junction with Bowley Lane at Punches Corner where it terminates.

We propose that the application should use this nomenclature for reference and to avoid confusion.

Kind regards,

Louise

Louise Chater PSLCC
Clerk
North Mundham Parish Council