

North Mundham Solar Installation 24/01859/FUL

Following a unanimous vote at the Parish Council meeting on the 3rd December 2024, North Mundham Parish Council writes to formally object to application 24/01859/FUL, for a large-scale solar installation on two parcels of land east of Runcton Lane.

This objection is to be submitted to Chichester District Council for their consideration in the determination of the planning application, and we request that officers and Members of the Council's Planning Committee consider the contents of our representation in assessing the merits of this application.

The Parish Council's objection to this proposal related to the following grounds:

1. The impact on highway safety during construction, stemming from inaccuracies in the applicant's submission and a lack of consideration for practical, on-the-ground logistics.
2. The use of drought-resistant Best Most Versatile (BMV) agricultural land for purposes other than growing food for at least a 40 year period.
3. The impact on local ecology.
4. The lack of consultation and engagement.

The Parish Council's representation should be read in conjunction with its previous letter issued to Chichester district council of 30th September 2024, raising questions and initial concerns regarding the planning application. This is attached as **Appendix 1** (Parish Council First Response) for ease of reference.

Highway Safety

North Mundham Parish Council's letter of the 30th September 2024 expresses concerns in relation to the accuracy and robustness of the submitted Transport Assessment, in addition to concerns regarding points of access to the site and impacts on the existing local highway network. Following our initial request for information and clarification, the applicant has submitted an Outline Construction Environment Management Plan (OCEMP) which details the proposed route of access from the B2166 Lagness Road. The OCEMP detailed movements for full sized articulated lorries to be driven down the private access route, and the relevant turning radii required to support this. The Parish has significant concerns over the suitability of this access route and the scope of any works which may be required to make this suitable.

We would draw CDC's attention to the representation from Mr Simon Kendall dated 3rd October 2024. As is set out and acknowledged in writing by the applicant in the attached letter within the representation, the proposed private access route is unsuited for modern farming equipment having been built in the 1960s, and saw heavy damage resulting from one month of use during the 2017 lettuce harvest which required subsequent remedial work. The level of movements proposed here during the construction of the solar

installation over an 18-month period will substantially exceed this loading on an unmodified road, and nothing has been outlined as to how the applicant intends to address this.

The proposal is to access Runcton Lane via the private road alongside Saltham Grange. This would be the primary delivery route from the Tupper's Field compound to the west half of the proposed solar installation, which we find to be deeply concerning. This route has additional multiple issues beyond the surfacing issues identified by Mr Kendall. Chiefly, it fails to account for the 10 Ton weight limit on the private bridge by proposing to use articulated lorries, and fails to outline the level of movements that would occur both generally and specifically across this bridge. This is of significant concern to the Parish, as an incident here i.e. damage to the bridge arising from overweight vehicle movements, would result in two major harms to the public interest: Firstly, access to the existing dwellings would be seriously compromised, and subject to a further 5T weight limit on Saltham Lane. Secondly, construction traffic would then be redirected onto the public highway network north of the access, causing substantial disturbance to residents along Runcton/Mill Lane and posing a potential threat to the extensive network of hedgerows and trees. This is a significant material consideration that must be fully addressed in the OCEMP.

Furthermore, the applicant has consistently stated the widths of Runcton Lane as between "3.7m to 4.5m wide". Independent investigation by the Parish Council (see accompanying **Appendix 2 - Runcton Lane Widths**) has confirmed that the road widths actually vary from 2.7m to 3.7m with a maximum of 4m at the Camic Pond junction as was stated in our original comments. The narrowness of these country lanes is of great concern to the Parish Council; we would ask CDC to engage with WSCC Highways to confirm the actual widths of the highway and confirm whether this changes their previous comments. The turning radii and routes of access shown on the Outline Construction Management plan from Saltham Grange (private road) onto and down Runcton Lane does not accurately reflect the scope of vehicular movements required to service this part of the development.

The CTMP states that there are no footways or cycleways along local highways. This is a misleading statement; the rural nature of the Parish and small size of the lanes is such that the public highway is a shared resource. Runcton and Bowley Lanes in particular are well-used by pedestrians, equestrians, and cyclists because of its quiet nature and connection to Public Right of Way 129 further south and cycle Route 288 to the west, which means it is a through route for non-motorised means of travel. The introduction of articulated lorries into this mix of existing users is wholly incompatible and presents a significant safety risk to the general public.

The general lack of information provided regarding the size, weight, and width of vehicles, in addition to the number of movements, and details of mid-life replacement and decommissioning of the site has led to a lack of confidence from the Parish. Whilst the Parish Council accepts that some of these issues may be resolved via condition, we would have expected the applicant's previous experience in solar developments to enable at least

estimates of these details to enable the Parish Council and WSCC Highways to appropriately understand the level of impact. In the absence of a substantive response to ours and WSCC Highway's original questions about the actual number of vehicle movements, the Parish Council has commissioned work to provide a high level estimate (**Appendix 3** - Solar Installation Estimated HGV Movements). The applicants claim a total of 200 two-way vehicle movements for the entire construction phase, whereas the assessment concluded approximately 600 HGV one-way movements will be required. This is a substantial difference, and we request that WSCC Highways are engaged to review this, as this level of heavy traffic down Runcton/Bowley Lanes would be seriously detrimental to the integrity of the highway and the existing users of the lane. The continued refusal of the applicants to provide the necessary accurate information is of great concern.

As it is, the lack of details have led to great consternation that the applicant has not taken an appropriate level of due diligence in preparing this submission and is deliberately obfuscating matters to provide themselves with strategic ambiguity going into the construction phase, to the detriment of the local environment and community.

Best Most Versatile Agricultural Land

The Parish Council objects to the extensive use of Best and Most Versatile (BMV) agricultural land as part of this proposal and the resultant loss of land for food and crop production. The National Policy Statement on Renewable Energy Infrastructure highlights that poorer quality land should be preferred to higher quality land, which is reflected in the text of Policy 48 of the current Chichester Local Plan.

The applicant's most recent submitted document *Note on Alternative Site Search and Rationale for Point of Connection Limit* highlights that this site was chosen for its ability to connect to either the Lovedean substation or the Chichester Food Park, rather than the site-specific suitability for solar generation. Whilst the Parish Council accepts that intrusive alternative site assessment would have been disproportionate, as set out in the referenced appeals, we would contend that these appeals are contextually different to the current application and they were judged on their own merits. Kent and Cornwall are not North Mundham, and the particular land designations of Chichester District (i.e. National Landscape and National Park) place much more significant pressure generally on the geographically constrained southern part of the District, where the majority of BMV agricultural land is located, compared to the other appeal sites which are much less constrained.

The land on this site is of exceptional value to agriculture; 74% of the proposal site is classed as BMV agricultural land, and significantly a substantial proportion benefits from existing irrigation provided by a purpose-built reservoir, which means that food crops grown here are highly resilient to drought. These site-specific factors have not been adequately addressed within any of the applicant's submitted statements, and is a material consideration as the

climate changes and rainfall patterns become more unpredictable. With this in mind, we do not believe that the proposal meets all criteria of Policy 48.

Within the national context of the need for renewable energy versus the need to protect high-quality agricultural land, it is our balanced view that the material considerations of this site places a much greater impetus on the existing and proven productive agricultural nature of the land above and beyond considerations of proposed renewable energy generation. The Parish Council concludes that adopted Policy 48 is not met because the applicant has failed to adequately prove that development of poorer quality agricultural land has been fully considered in preference to best and most versatile land.

Ecology

We are aware that the applicant has sought to discredit Chichester District Council's strengthening and designation of a proposed wildlife corridor in the emerging Local Plan by arguing that the strategic wildlife corridor is better related to land to the east (within Arun DC). However, unless the Inspector raises broader concerns regarding the evidence base supporting the wildlife corridor strategy, the Parish Council considers the Council's allocation of the strategic wildlife corridor to be sound. The policy effectively supports the District's objective of preserving and enhancing habitat connectivity between and within the South Downs National Park and Chichester and Pagham Harbours. As such, the Parish Council supports the objectives of emerging policy NE4 without substantial modification, and some weight can be afforded to it prior to official adoption.

The most recent comments from CDC's Ecologist confirm that there are significant remaining gaps in the submission, notably issues with the BNG assessment, a lack of consideration of impact on the strategic wildlife corridor, the unreasonable proximity of development to the Pagham Rife and the ancient woodland, the lack of detail on lighting, and missing mitigation strategies for the impact on the ancient woodland, and upon dormice, water moles, and badgers.

In the Parish Council's view, this lack of attention to ecology is evidence of an approach to development that seeks to maximise the profit over delivering a substantial and meaningful benefit to local ecology and the local community. These factors are cumulatively significant, and are exacerbated within the context of other identified harm.

The Parish Council wishes to reserve any final comments here until the applicant's response to CDC's Ecologist questions are published.

Community Consultation

NPPF (December 2024) Paragraph 40 informs that "Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community". Paragraph 41

further informs that the LPA must encourage applicants to undertake meaningful engagement. Furthermore, Paragraph 137 highlights that “Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.”

With this in mind, we would highlight that the Village Hall was advanced pre-booked for a period in excess of four months and the event was then re-scheduled on four occasions. Throughout this period, we were not informed why the Village Hall was booked. It was not until 5 days before the event that the applicant informed the nearest houses to the development, which is when the Parish found out about the development. We did not have sufficient opportunity to organise enough of the community to attend the event at such short notice.

At the meeting, it was suggested by the applicant’s agent that this application was a “Done Deal” and that there was no point in raising any objection. Our subsequent requests for further information and complete details of the proposed submission have been treated as an inconvenience, and when we have raised issues with incorrect information and missing details, the applicant has attempted to gloss over the issues.

No consultation was undertaken with the immediately adjacent Pagham Parish Council, and it took the Parish to ask for their consultation for them to be first engaged on the development.

Furthermore, the Parish Council understands that the applicant has still not engaged with the owner of Saltham Grange about the proposed use of their private roadway which sits at the core of the delivery of the Transport Plan.

The overall disdain for community engagement that the applicant has demonstrated has caused us a great deal of concern, and is in large part the reason why this development has seen such a severe level of backlash from the local community.

Other Concerns

The local impact of this development is undeniable. A large tract of our valued countryside will be covered by solar panels and associated infrastructure, resulting in a loss of open rural tranquility that is highly valued by Parish residents and visitors alike. Whilst we accept that the land is not afforded the same protection as the National Landscape / National Park, we would nonetheless ask that the landscape impact is taken into account as an additional consideration to the other core harms we have identified.

The lack of detail on external lighting is a supplementary concern, and it remains unclear what degree of landscape and visual impact would arise from the fixed units for lighting and CCTV and precisely where it would be sited. Although such details can be controlled via condition, it would have provided greater confidence to the Parish Council and concerned residents for these details to have been provided up-front.