

**Proposed Solar Panels, No.9 Old Canal Caravan Site, Lidsey Road, Bognot Regis,
PO22 9PN**

Planning, Biodiversity, Design and Access Statement

Introduction/Proposal

To reduce their imported energy consumption and carbon footprint the applicant has the space and would like to install 16 solar panels on the roof of their caravan.

It is our opinion that the solar panels do not require planning permission because they will be on the roof of a mobile home that can be moved from site to site. As such the proposal does not amount to development that requires planning permission. ADC do not agree, hence the submission of this application, which is submitted without prejudice to our position that planning permission is not required.

This application is being submitted is due to the current delays in dealing with planning appeals. The applicant is elderly and is anxious to reduce his heating costs.

Legislation and Climate Change targets

The UK's Climate Change Act 2008 states that the UK is required to reduce its greenhouse gas emissions by 80% by 2050 when compared to 1990 emissions levels. In 2019 this target was increased to net zero by 2050.

Government Response to the Climate Change Committee October 2025 adaption progress report.

The Committee has advised that the impacts of climate change are accelerating and the need to strengthen the UK's resilience is more urgent than ever. Further action is needed to meet the scale of the challenge. The Warm Homes Plan seeks to help people find ways to save money on heating bills and transform our aging building stock into comfortable, low carbon, homes that are also resilient to climate change.

Current targets

The UK Government announced new climate goals at COP29 (December 2024), reducing emissions by 81% on 1990 levels by 2035. Whilst more recently there is talk about reducing some climate change targets for economic reasons, the Government has stated it remains committed to reducing carbon emissions.

West Sussex Climate & Adaption Plan Strategy 2020-2030

This document sets out West Sussex County Council's target to be carbon neutral by 2030.
West Sussex Climate Change Strategy 2020-2030

Planning Policy

National Planning Policy Framework 2024 (Framework)

The overall planning policies of relevance to this application have been set out in the Framework. The Framework seeks to achieve sustainable development and states that Local Planning Authorities should positively seek opportunities to meet the development needs of their area. The Core principles of the Framework are to adopt a pro-active approach.

The Framework actively promotes measures that help mitigate the impact of climate change. It states that the planning system should support the transition to a low carbon future and help shape places in ways that contribute to radical reductions in the emission of greenhouse gases. Planning should support the use of existing resources and support renewable and low carbon energy and associated infrastructure.

Paragraph 161 states that the planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change.

Paragraph 162 states that plans should take a pro-active approach to mitigating and adapting to climate change, taking account of the risk to biodiversity, landscapes and overheating from rising temperatures.

Paragraph 163 states that the need to mitigate and adapt to climate change should be considered in assessing planning applications, taking into account the full range of potential climate change impacts.

Paragraph 165 states that to help increase the use and supply of renewable and low carbon energy and heat, plans should:

- a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, and their future re-powering and life extension, while ensuring that adverse impacts are addressed appropriately (including cumulative landscape and visual impacts);
- b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and
- c) identify opportunities for development to draw its energy supply from

decentralised, renewable or low carbon energy supply systems and for colocating potential heat customers and suppliers.

Paragraph 166 states that in determining planning applications, local planning authorities should expect new development to:

- a) comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and
- b) take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

Paragraph 167 states:

Local planning authorities should also give significant weight to the need to support energy efficiency and low carbon heating improvements to existing buildings, both domestic and non-domestic (including through installation of heat pumps and solar panels where these do not already benefit from permitted development rights).

Where the proposals would affect conservation areas, listed buildings or other relevant designated heritage assets, local planning authorities should also apply the policies set out in chapter 16 of this Framework.

Paragraph 168 states: When determining planning applications for all forms of renewable and low carbon energy developments and their associated infrastructure, local planning authorities should:

- a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future; 7
- b) recognise that small-scale and community-led projects provide a valuable contribution to cutting greenhouse gas emissions;
- c) in the case of applications for the repowering and life-extension of existing renewable sites, give significant weight to the benefits of utilising an established site.

Concerning design, the Framework states that new development should function well and add to the overall quality of the area; establish a strong sense of place, optimise the potential of the site and reflect the identity of local surroundings, while not preventing or discouraging appropriate innovation. Planning decisions should not stifle innovation, originality or initiative. Regarding the countryside proposals should respect their rural surroundings and not have an adverse impact on biodiversity.

Draft Revised National Planning Policy Framework 2025

Policy CC2 2. States that substantial weight should be given to the benefits of improving the energy efficiency of existing buildings and/or drawing energy from renewable and low carbon sources.

National Planning Practice Guidance (PPG)

The PPG confirms the Government's commitment to increasing the amount of renewable energy and low carbon technologies in the UK. It clearly states that addressing climate change is one of the core land use planning principles and that planning policies and decisions should positively support proposals for renewable energy. It also reflects the requirements set out in the Framework relating to listed buildings, design, landscape and biodiversity. The Framework supports sustainable forms of development and promotes measures that help mitigate the impact of climate change. It states that the planning system should support the transition to a low carbon future and help shape places in ways that contribute to radical reductions in the emission of greenhouse gases. Planning should support the use of existing resources and support renewable and low carbon energy and associated infrastructure. Also, that so that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development.

Arun District Local Plan 2011 – 2031 (LP)

This Plan is out of date in relation to the current position on climate change.

Irrespective of this policy ECC SP2 addresses climate change and energy efficiency. It states:

“All new residential and commercial development (including conversions, extensions and changes of use) will be expected to be energy efficient and to demonstrate how they will:

- a. Achieve energy efficiency measures that reflect the current standards applicable at the time of submission;*
- b. Use design and layout to promote energy efficiency; and*
- c. Incorporate decentralised, renewable and low carbon energy supply systems, for example small scale renewable energy systems such as solar panels.*

All major developments must produce 10% of the total predicted energy requirements from renewable or low carbon energy generation on site, unless it can be demonstrated that this is unviable. Energy efficiency measures will be taken into consideration when the total predicted energy requirements are calculated. The Council will consider ‘allowable solutions’ where it is clearly demonstrated that the provision of on site renewable or low carbon energy generation is unviable or not feasible. Where planning permission is required to retrofit energy efficiency measures into existing development, schemes will be permitted, subject to the Design and Built Heritage policies. In assessing the achievement of these

standards the Council will consider: Site constraints; Technical viability; Financial viability; and Delivery of additional benefits.”

Policy ECC DM1 states:

“The Council will support renewable energy development subject to the criteria in this Policy. Schemes will be expected to contribute to the social, economic and environmental development and overall regeneration of the District.

Within areas of protected landscapes, areas or buildings, development should generally be small scale or community based.

The Council will support proposals for appropriately located renewable energy development, and their ancillary development where they meet the following criteria:

- a. The proposal is located and designed to minimise adverse impacts to landscape, habitats, the historic environment and residential amenity including visual, noise and odour impacts;*
- b. The location and design of proposals will need to take account of the Council’s landscape assessment and landscape sensitivity studies (or successor documents) and proposals for large scale renewable energy projects will need to be supported by a zone of theoretical visibility and viewpoint assessment;*
- c. Priority should be given to proposals that integrate with existing or new development where appropriate to do so having regard to (a); and*
- d. All proposals will need to demonstrate a suitable connection to the electricity distribution network, or appropriate energy storage facility, and provide evidence to demonstrate that the connection will not result in unacceptable impacts upon the landscape, natural and historic environment or visual and residential amenity.”*

Planning merits

The proposal fully complies with the above proposals and policies for the reasons set out below.

The property is located within the countryside, in an area which is characterised by a flat open landscape, which includes a waste site, caravan parks and industrial buildings. Much of the surrounding land is allocated for urban expansion.

The proposed solar panels would be positioned on the mobile home which sits on a brick skirt and has a very shallow pitched roof. The caravan is set back from the highway and is screened from public views by numerous mobile homes and a variety of buildings. Even in close private views the solar panels will not be noticeable due to the shallow pitch of the mobile home roof.

Caravans are not energy efficient and so the solar panels will materially reduce the need for mains electricity and calor gas.

The panel, bracket and solar specification submitted with the application is self explanatory and there is no need to repeat the information in this statement

No trees or vegetation within the application site or the surrounding area will be affected by the proposed solar panels.

Biodiversity and BNG

Due to its location within the countryside there will be protected species in the area. However, due to their method of installation the proposed solar panels will not result in the removal of any vegetation, or otherwise harm wildlife.

Accordingly, the proposal will have no impact whatsoever on biodiversity and is exempt from BNG.

The proposed solar panels will also reduce greenhouse gases, which will benefit wildlife and their habitats.

Accordingly, the proposal will benefit biodiversity.

Conclusion

For these reasons the proposed solar panels will accord with current and emerging environmental policies and legislation.

The proposal complies with the three objectives of sustainable development in the following ways:

- Economic – employment during the installation and manufacture of the parts.
- Social – reducing CO2 levels.
- Environmental – helping to mitigate the impact of climate change; and enhancing BNG.

Overall, the proposal accords fully with the relevant policies set out in the Framework and the Arun District Local Plan, as well as the objectives and policies of the emerging Local Plan, the Draft National Planning Policy Framework, the Climate Change Act and West Sussex Climate Change Strategy.

Chartered Town Planner

Elizabeth Lawrence Ltd
Woodend, Water Lane, Storrington, West Sussex, RH20 3LY

