

P. Carder
7 The Laurels
Southwater
West Sussex

Your Ref: OWPC3125
Our Ref: BE/63/14/PL 21-05-2014
Please ask for:
Mr C Cronin

11th July 2014

Dear Sir/Madam

Town & Country Planning Act 1990 (as amended)
Town and Country Planning (Development Management Procedure) (England) Order 2010 (as amended)

Installation of Solar Farm comprising erection of solar arrays, inverters, transformers, equipment housing, security fencing, internal tracks & ancillary equipment. Departure from the Development Plan.

Manor Farm Shripney Lane Shripney

Thank you for your internet representation made on 10th July 2014 which has been recorded as '**an objection**' with the comments as follows:

For the following reasons, CPRE Sussex opposes this application for the development of a 50-hectare 'solar farm' on Grade 2 agricultural land.

As the application site lies outside any defined settlement boundary, it is for the purposes of Arun Local Plan (saved) Policies GEN2 and GEN3 therefore to be classed as countryside where development will only be permitted if it can be shown to satisfy one of the exceptions enumerated in Policy GEN3. The applicants claim for their proposed development Policy GEN3 exceptions (iii) that it is 'for the diversification of the rural economy' and (v) that 'it is in accordance with a Policy in Sections 2 and 3 of the Plan referring to a specific use or type of development', namely Policy GEN21: Renewable Energy. The first exception claimed is clearly inapplicable, as the proposed development is evidently outside the scope of the GEN3 Policy Explanation (# 1.12) that 'Rural diversification aims to help replace income lost from existing sources [the applicants state not which] so that farmers can remain actively farming and continue to be stewards of the countryside'. The applicants however also claim that, as the 50-hectare solar park will 'not be a prominent feature within the landscape' (Planning Statement # 3.7), their application should be approved as it satisfies the first condition of Policy GEN21 that such development should have 'no significant environmental effect on the quality of the natural or built environment'. Although the applicants therefore consider their proposal to be in conformity with the District's Development Plan (# 5.2), they also cite in its support NPPF para. 98 that - unless material considerations indicate otherwise - requires LPAs 'to approve applications for renewable energy development if its impacts are (or can be made) acceptable'.

However, Natural England has advised the Council that 'Based on the information available to us we consider this application is likely to impact on a significant amount of "best and most versatile agricultural land" to which. NPPF para. 112 refers', in relation to which the Planning Practice Guidance for Renewable and Low Carbon Energy, as revised in March 2014, requires the LPA to consider, where a proposal involves greenfield land, whether 'the proposed use of any agricultural land has been shown to be necessary and poorer quality land has been used in preference to higher quality land' (para. 013). This provision was strictly interpreted by the Planning Inspector who earlier this month rejected an appeal against an LPA's refusal of permission for a 38-hectare solar park on Grade 2/3a farmland in Suffolk, and who in her decision letter also emphasised the requirement of the revised Planning Practice Guidance that in order to encourage 'the effective use of

land' large-scale solar farms should be focussed on previously developed and non-agricultural land, if necessary even on land outside the LPA area subject to the planning application (see APP/D3505/A/13/2204846 para. 77-78).

Your views will be considered before the application is determined and I shall write to inform you of any decision made.

Please be aware that if the application is to be determined by the Council's Development Control committee and your letter has been received at a late stage after the Agenda has been published you will not receive a separate letter notifying you of the date of the meeting and procedures for public speaking. In such circumstances it is recommended that you track the progress of the application on the Council's website or telephone the Council for further information. Please be advised that any comments you make that are not included within the Committee Agenda will be reported to the Members of the Development Control committee. Please also be aware that only a small number of all planning applications received go the Development Control Committee. Most are determined under delegated powers by Officers in which case your comments will again be considered before the application is determined.

Please be aware that Planning Services operate an 'open file' policy and will publish details of your comments on the internet on the Arun District Council Planning section. Please ensure that you only provide information that you are happy will be made available in this way. If you supply information belonging to a third party, please ensure you have their permission to do so. If you do not wish your comments to appear on the 'open file' please confirm this in writing and I will arrange for it to be destroyed although this means that its contents will then be disregarded.

In the event of a subsequent written representations appeal, against a refusal of planning permission on a householder application, any representations made on the application will be automatically forwarded to the Secretary of State. Unlike all other types of appeal, there will be no further opportunity to comment at the appeal stage.

Yours faithfully

Karl Roberts
Assistant Director Planning & Economic Regeneration