

Lewis & Co Planning

town planning consultants

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Mr J Baeza
Development Control
Arun District Council
Civic Centre
Maltravers Road
Littlehampton
West Sussex
BN17 5LF

3rd March 2015

Dear Sir/Madam

Land at Brookbarn Farm Courtwick Lane Littlehampton BN17 7PX

We write in relation to the application for a proposed solar energy park on the above land (Ref LU/385/14/PL) on behalf of the Hyde Housing Association.

Our clients own Nos 22-70 Old Mead Road, (located adjacent to the application site) and strongly object to the proposed development for the reasons set out in this letter.

Development on Rural Greenfield Land

Whilst the application site was used as a landfill site between November 1975 and October 1984, it does not meet the definition of previously developed land as set out in the National Planning Policy Framework. The District Council is therefore being asked to allow substantial development on a greenfield site in the countryside. Paragraph 5-013-20140306 of the National Planning Practice Guidance acknowledges the negative impact that large scale solar farms can have on the rural environment and encourages such developments to be located on previously developed land and non-agricultural land.

No evidence has been submitted with the application to demonstrate that less sensitive locations (e.g. brownfield urban sites) have been reviewed in advance of rural arable land. Paragraphs 5.4 to 5.6 of the Planning Statement clearly state that the site was selected due to the proximity of a grid connection and because it is not classified as Grade 1, 2 or 3a agricultural land. This approach therefore conflicts with guidance contained in the NPPG.

Given the protection afforded to this location by Policy GEN3 of the adopted Local Plan (Protection of the Countryside) and Policy CSP1 of the new Local Plan (Submission version), the application fails to demonstrate that other less harmful locations have been considered.



RTPI

mediation of space - making of place

Chartered Town Planners

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Strategic Gap

The application site is located within the Arundel/Littlehampton Strategic Gap which is protected by Policy Area 10 in the adopted Local Plan and Policy SD SP3 in the emerging Local Plan. Both policies seek to prevent the coalescence of the two settlements in order to retain their separate identity. The proposed solar farm would clearly cause harm by eroding this gap regardless of the proposed planting scheme.

Flood Risk

The site access is located within flood zone 3 and the surrounding residential properties are located within flood zones 2 and 3. As such, there are concerns that the proposed development would increase the risk of flooding in these areas. Whilst the submitted Flood Risk Assessment states that the proposed development would not increase the risk of flooding, the District Council is respectfully requested to wait for feedback from the Environment Agency before forming a conclusion on this matter.

Highway Issues

The site entrance is via a single carriageway which was designed to provide access to Brook Barn Farm and is currently in a poor state of repair. The use of 16.5 metre articulated lorries during the 10 week construction period (see paragraph 3.8 of the Transport Statement) is likely to result in further damage to Old Mead Road and should not therefore be permitted for highway safety reasons.

The applicants have suggested that a Construction Management Programme will include proposals for the temporary ban on the parking of vehicles on the first 20 metres of Old Mead Road at the point where it meets the A284 Lyminster Road. However, this road is privately owned and no evidence has been submitted to demonstrate that this measure can be achieved. The delivery of the solar energy park without causing detriment to surrounding residents is therefore doubtful.

Visual impact

The application site is located within Local Plan Policy AREA3 and emerging Local Plan Policy LAN DM2 which seek to protect the views and setting of Arundel. Whilst the application is accompanied by an 'Appraisal of Landscape & Visual Effects' these policies clearly emphasise the sensitive character of the location and the unsuitability of the site for major built development.

Noise Disturbance

The residents of 22-70 Old Mead Road are very concerned about the likely noise disturbance from the proposed generators and transformers whilst in operation and from the pile driving during construction. We note that the District Council Environmental Health officer has identified noise disturbance as a potential issue and has requested the submission of an Acoustic Report. Should such a report be submitted, we hereby request an extension to the public consultation period in order to review the document and have the opportunity to comment accordingly. In the absence of any further supporting information, the application remains contrary to adopted Local Plan Policy GEN7 due to the adverse impact on residential amenity.

Conclusions

The application site is greenfield arable land in a rural location within a strategic gap and a protected landscape setting (AREA3). The proposed solar farm represents major development which is clearly inappropriate for such a location. The applicants have not carried out a full sequential site analysis and have not demonstrated that sites in less sensitive locations are unavailable. Furthermore, the development would have detrimental effects on the local residents in terms of noise disturbance and highway safety.

For these reasons, the proposed solar park is contrary to the relevant saved policies in the adopted Arun Local Plan (2003) and those in the emerging Local Plan (2011-2031). We therefore request that the application is refused accordingly.

If you would like to discuss this letter further please contact Paul Burgess MRTPI [REDACTED]
[REDACTED]

Yours faithfully

Lewis & Co Planning
[REDACTED]