



The countryside charity
Sussex

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Attention: Case Officer Ms Nicola Pettifer

Horsham District Council
Parkside
Chart Way
Horsham
West Sussex
RH12 1RL

19 March 2022

Dear Ms Pettifer,

Supplementary representation for and on behalf of CPRE Sussex, additional to our OBJECTION dated 27 February to:

DC/22/0100

Land North of Huddlestone Farm Horsham Road Steyning West Sussex

Installation of a solar farm with associated infrastructure.

CPRE Sussex is concerned that a whole-life carbon assessment has not been provided for this application.

A whole-life carbon assessment is required in order to demonstrate and verify that the proposed scheme could achieve, as stated in the applicant's Planning Statement, a reduction of 4,807 tonnes of CO2 per annum.

1. The applicant's Planning Statement states:

Paragraph 7.16 The Proposed Development would supply clean renewable electricity for distribution to the DNO, contributing to the objective of sustainable development in accordance with NPPF paragraph 11, adopted Local Plan Policy and increasing renewable energy generation in accordance with NPPF paragraph 152. This quantity of additional renewable energy is a significant contribution to meeting both national and local renewable energy targets. It is a significant environmental benefit, displacing as it does 4,807 tonnes of CO2 per annum, which represents an emission saving equivalent of a reduction in approximately 1,589 cars on the road every year' (see also paragraphs 1.3, 7.71 and 8.3).

1.1 However, no evidence is provided to support these figures.

2. It is stated in the Draft Overarching National Policy Statement for Energy (EN-1), published September 2021, under the heading 'Applicant's assessment':

To promote, enhance and protect a thriving countryside for everyone's benefit

President: Lord Egremont

Campaign to Protect Rural England Sussex Branch CIO | Registered charity number: 1156568

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Paragraph 5.3.4 'All proposals for energy infrastructure projects should include a carbon assessment as part of their ES (See Section 4.2). This should include:

- A whole life carbon assessment showing construction, operational and decommissioning carbon impacts.
- An explanation of the steps that have been taken to drive down the climate change impacts at each of those stages.
- Measurement of embodied carbon impact from the construction stage.
- How reduction in energy demand and consumption during operation has been prioritised in comparison with other measures.
- How operational emissions have been reduced as much as possible through the application of best available technology for that type of technology.
- Calculation of operational energy consumption and associated carbon emissions.
- Whether and how any residual carbon emissions will be (voluntarily) offset or removed using a recognised framework.
- Where there are residual emissions, the level of emissions and the impact of those on national and international efforts to limit climate change, both alone and where relevant in combination with other developments at a regional or national level, or sector level, if sectoral targets are developed'.

3. In conclusion, a whole-life carbon assessment, as detailed above, is required to demonstrate that a reduction of 4,807 tonnes of CO₂ per annum could be achieved over the lifetime (40 years) of the proposed scheme.

3.1 The application ought not to be considered without the essential assessment.

Yours faithfully,

Dr R F Smith DPhil, BA (Hons), FRGS

Trustee CPRE Sussex

Copy to Chair CPRE Sussex