



The countryside charity
Sussex

Campaign to Protect
Rural England, Sussex Branch CIO
Brownings Farm, Blackboys,
East Sussex, TN22 5HG
Tel 01825 890975
e-mail info@cpresussex.org.uk
www.cpresussex.org.uk

October 6th, 2024

Dear Sir/Madam,

24/01859/FUL | Construction of a renewable energy project comprising solar photovoltaic (PV) panels and associated works including inverters, transformers, substation and on-site collecting cable, access tracks, security fencing and gates, CCTV cameras and poles, landscaping, + temporary construction compounds |
Land Adjacent Lime Kiln Barn Runcton Lane Runcton W Sussex PO20 1XJ

CPRE-Sussex is supportive of renewable energy projects BUT they need to be in the right place. In 2022, the organisation initiated a campaign for the use of roof top solar panels (App 1). CPRE-Sussex recommends this application be refused given its importance to agriculture and wildlife as there are better alternative sites which should be used.



Fig 1: Application site, South Mundham.

Submitted by Dr Jill Sutcliffe, CPRE Trustee and Co-founder Manhood Wildlife and Heritage Group, MWHG. Ingrams Farm, Fittleworth Road, Wisborough Green RH14 0JA

CONTEXT

1.

The Manhood Peninsula (MP) supports a wealth of wildlife on its internationally designated sites – Chichester and Pagham Harbours and the Medmerry coastal realignment site which is compensatory reserve for land being lost on the Solent and which is currently evolving into an internationally important site; and, both on and offshore with the Solent +, via its rare habitats and the species they support. Thus, any application must respond sensitively to this plethora of highly designated sites, their rare wildlife and the associated buffer zones. *As stated in paragraph 13.1 of Chichester Local Plan (CLP) the area has a separate distinctive character and faces a specific set of challenges which include environmental designations that cover, or impact on, most of the Peninsula.*

2.

Clearly the new Government is keen to reach the Net Zero target and is reviewing the Planning system including the National Planning Policy Framework, NPPF, and undertook a consultation which closed Sept 24th, 2024.

3.

The Town and Country Planning Association (TCPA) has addressed some of the issues arising in the consultation and found that the climate crisis has been inadequately addressed to date. Lord Deben, former chair of the independent Climate Change Committee, stated that there are 2 issues which need addressing with respect to planning applications: Climate Change, and Sustainable Development.

4.

The focus of this submission is the inappropriateness of the proposed development with respect to these 2 issues, plus environmental and ecological evidence. There is a requirement for renewable energy and the current UK government promotes renewable energy in view of the climate emergency *in suitable areas: 'Once suitable areas of renewable and low carbon energy have been identified in plans, local **planning authorities should expect subsequent applications for commercial scale projects outside of these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas.**'(par 169 of the Framework).*

5.

There is also a Biodiversity Emergency, declared in 2019 by the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem (IPBES¹). The UK is thus facing three major environmental threats: biodiversity loss, climate change and land use change. Without action, the combination of these threats will result in catastrophic

¹ IPBES (2019) [Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services](#): Summary for policymakers of the global assessment report on biodiversity and ecosystem services of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services

consequences for nature, the economy, and our way of life. As Sir David Attenborough says:

“It may sound frightening, but the scientific evidence is that if we have not taken dramatic action within the next decade, we could face irreversible damage to the natural world and the collapse of our societies.”

6. The type of installation being proposed, its impacts on important wildlife areas, wetlands and the proximity of internationally important wildlife sites means that the proposed solar farm should be refused. It is our contention that the application itself should have been subject to an Environmental Impact Assessment (EIA) given the proximity of Designated sites and their Site of Special Scientific Interest (SSSI) impact zones plus the proposed CDC wildlife corridor in the Local Plan² linking the South Downs National Park (SDNP) to the Manhood Peninsula (MP) rare species and the requirement for a Habitats Regulations Assessment (HRA).

APPLICATION SITE

7. This is a rural area forming part of the Manhood Peninsula (MP). West Sussex County Council (WSCC) has several policies and projects in place to manage flooding and coastal change on the MP and the County was involved in the ESPACE Project which produced a *Climate Adaptation Plan for the Manhood Peninsula*. The MP itself is not named on any map. The area is included in landscape character areas: SC2: in the southwest of the county, to the south of Chichester, between the harbours of Chichester (SC3) and Pagham (SC4).
8. A large part of this area has been reclaimed from the sea and remains below the current high spring tide level. It is mainly flat open landscape, dominated by highly productive large arable fields and modern farm buildings characterised by a loss of tree and hedgerow cover and of grassland habitats. Losses have resulted from disease (Ash dieback, Dutch elm disease) some farm payments and the development of large machinery.
9. The MP has an above average sunshine for the UK making it attractive for agriculture and tourism, the area's two most important industries Destination Management Plan, DMP, 2018-23. *The local economy is heavily dependent on tourism, agriculture and horticulture (par 13.1 of CLP)*
10. The local volunteer-led Manhood Wildlife and Heritage Group (MWHG) undertook a Heritage Lottery Funded project, *FLOW, Fixing and Linking Our Wetlands* visiting each

² CDC Local Plan Examination in Public commences October 1st and the natural environment will be examined on Nov 13th

wetland on the MP – ditch, rife, pond, saline lagoon and part of the canal – and drew up reports given to each of the 11 Parish Councils. Habitation is predominantly distributed in scattered small traditional settlements and a larger suburban village. The group also measured the hedging and found 380kms to be gappy and/or missing and is undertaking a project of re-planting, across the peninsula.

11. The group's current project, *Hedging Our Future*, funded by Southern Water aims to re-plant 380 kms of missing hedgerows on the MP. The group started in Sidlesham parish and will be working in the adjoining Parishes of Hunston and North Mundham this winter. The group manages Camic pond.
12. During their work on the MP the group identifies species and submits their records to the Sussex Biodiversity Records Centre (SxBRC). In 2021, the group was the runner-up in the National Biodiversity Network (NBN) recording awards.
13. Taken together, the Harbours and the Medmerry site plus a growing network of quiet roads and offroad footpaths, cycle ways and bridlepaths offer major potential for peaceful enjoyment of the Manhood area towards Integrated Coastal Zone Management (ICZM) on the Manhood Peninsula, FINAL, 2011.
14. The District will experience very intensive rainfall, water shortages (Natural England/Environment Agency 2013 report), flooding and hot summers. Currently the UK is **not** on track to meet the Paris Agreement to keep global temperature from exceeding 1.5 °C above pre-industrial levels (Independent Climate Change Committee report, 2023).

“We need to mitigate the damage from climate change, by reducing or stopping the human activities which are causing it. We can do that...by cutting our emissions of greenhouse gases.”

Sir James Bevan, CEO of the EA, 2019

- 14.1 *The Framework expects decisions to promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions (NPPF paragraph 124). However, in paragraph 125 b) stresses that decisions should recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production.*
- 14.2 *The applicant's document prepared by Reading Agricultural Consultants (April 2024) states that proposal site (48.4ha) comprises grade 2 (12.5ha) and grade 3a (23.6ha) agricultural land (74%) whilst best and most versatile agricultural land is land in grades 1, 2 and 3a of the Agricultural Land Classification (Annex 2 of the NPPF). The timescale of this proposal is 40 years.*

14.3 *LP policy 48 relates to the natural environment generally and it states that planning permission will be granted where it can be demonstrated that several criteria have been met. Among other things, it requires that development of poorer quality agricultural land has been fully considered in preference to best and most versatile land. In addition, LP policy 45, which relates to development within countryside, and one of its requirements is that proposals should be complementary to and does not prejudice any viable agricultural operations on a farm. Paragraph 88b) of the NPPF stresses that decisions should enable the development and diversification of agricultural and other land-based rural businesses alongside with sustainable rural tourism and leisure developments which respect the character of the countryside. The NPPF, par 187, states that decisions should contribute to and enhance the natural and local environment. This should include, amongst other things, recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land.*

14.4 *National Preparedness Commission report ‘Just in Case: 7 steps to narrow the UK civil food resilience gap’, published on February 6, 2025, states that post EU, the UK still has no coherent food policy – yet nearly a third of its food still comes from Europe and global supplies have other demands too. The report suggests 15 key recommendations and two of them advise that a new coherent UK food policy is developed, and land use policy should give higher priority to food production potential in and around urban areas, taking account of public access to land for food growing, where possible.*

For the above reasons, the proposal would not comply with local policies 45 and 48 or relevant paragraphs of the NPPF.

BIODIVERSITY

15. A *biodiversity Emergency* was declared in 2019 by the IPBES³ and the UK is the most depleted country with respect to its wildlife, so we need to look after what we have got.

15.1 The proposed site lies in isolated countryside to the north of Pagham Harbour and 1.2 miles (2 km) south of North Mundham, its larger neighbour.

³ The Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) is an independent intergovernmental body established by States to strengthen the science-policy interface for biodiversity and ecosystem services for the conservation and sustainable use of biodiversity, long-term human well-being.

DESIGNATED SITES WITHIN 5 KM OF THE APPLICATION SITE		
Name	Designations	Distance
Zone of Influence 5.6 km		
Chichester Harbour	National Landscape	
Chichester and Langstone harbours	Special Protection Area Ramsar site	4.8km
Pagham Harbour	SPA	1.2 km NE
Pagham Harbour	Ramsar	1.2 km
Solent maritime	SAC	4.8 km
Medmerry coastal realignment site	PSSSI, PSPA	6.5 km
Solent & Dorset Coast	SPA	1.2 km

- 15.2** *Paragraph 192 of the NPPF suggests that plans should identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement restoration or creation to protect and enhance biodiversity and geodiversity.*
- 15.3** The Levelling Up and Regeneration Act, 2023, LURA, sets the groundwork for the introduction of new Environmental Outcomes Reports (EORs) which are expected to replace EIAs, but the detail of implementation and operation will need to be established through subsequent EOR regulations.
- 15.4** **Pagham Harbour (PH)** is a 629-hectare (1,550-acre) biological and geological Site of Special Scientific Interest, SSSI, on the western outskirts of Bognor Regis in West Sussex. It is a Geological Conservation Review site, a Nature Conservation Review site, https://en.wikipedia.org/wiki/Pagham_Harbour a Ramsar Site, a Special Protection Area, SPA, and a Marine Conservation Zone. It covers an area of 599.1 hectares (1,480 acres) and is a RSPB Local Nature Reserve. The application site lies within the SSSI PH zone of influence.
- 15.5** Designated for its internationally important breeding and overwintering water birds, waders Pagham Harbour is an overwintering area for over 120 species of bird. The numbers of wintering pintail, ringed and grey plover and black-tailed godwit regularly reach 1% of British populations and the site is of international

Map A2: Estuarine Water Body Overview - Pagham Harbour

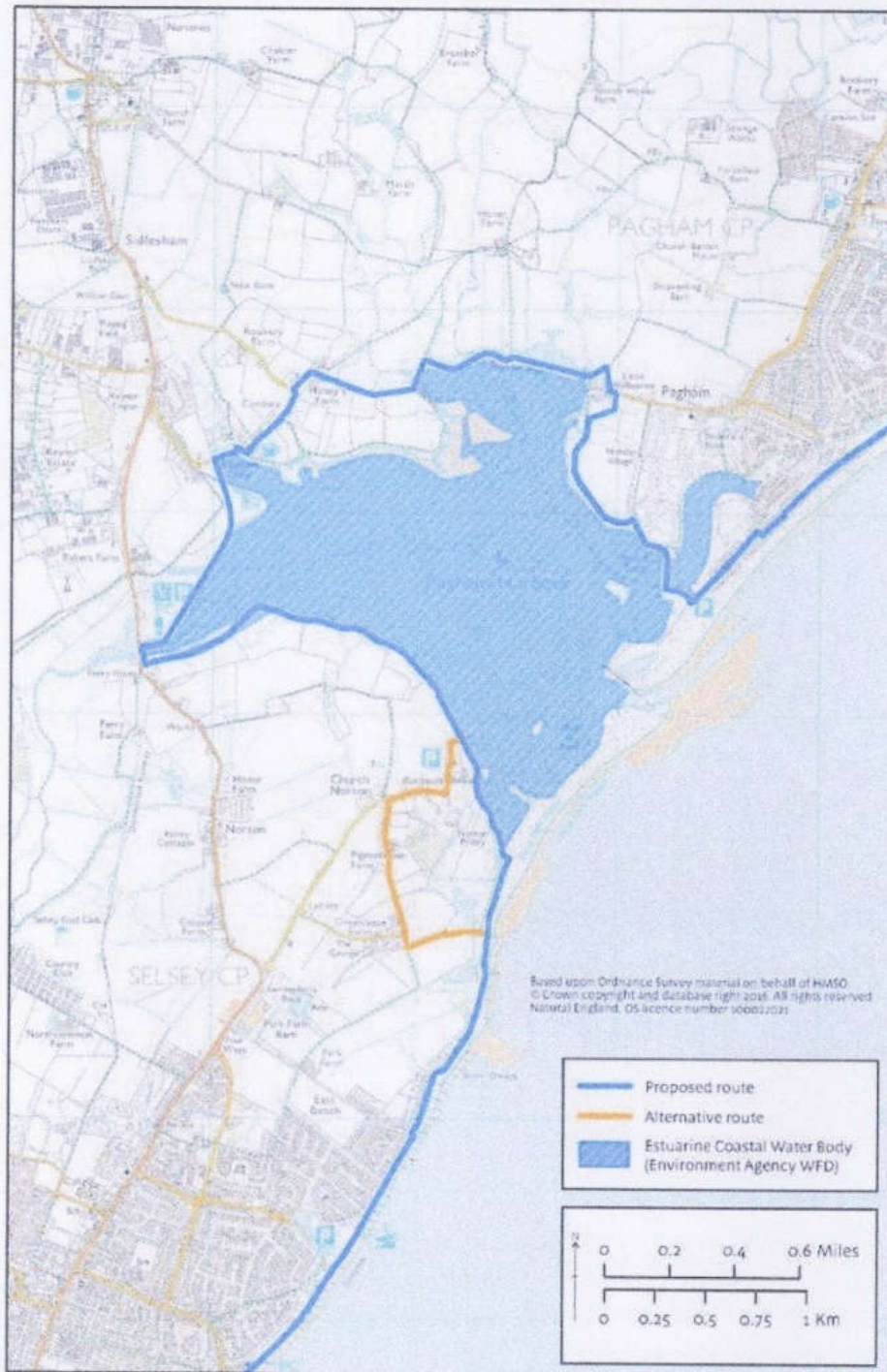


Fig 2: Map of Pagham Harbour

importance for wintering ruff and Brent Geese. The mudflats also provide food for a diverse breeding community of birds including oystercatcher, shelduck and redshank. Notable invertebrates include the sand dart *Agrotis ripae*, Matthew's wainscot moth *Mythimna favicolor* and the long-winged conehead grasshopper *Conocephalus discolor*

plus coastal habitats, seagrass beds. Also, for its populations of Defolin's lagoon snails and lagoon sand shrimp.

- 15.6** South Downs National Park Authority agreed in their comment that 'the site is sufficiently far from the NP and the panel will be facing southwards away from the SNDP and so issues of glint and glare will not be considerations. However, there are designated areas (SPA, Ramsar, SAC) to the south of proposal site and the question is how these areas will be affected in terms of glint and glare?
- 15.7** The area where the solar farm is proposed to be located is part of a significant strategic wildlife corridor identified in the Manhood and Wildlife and Heritage Group's Fixing and Linking Our Wetland study, and NOW contained within the CDC Local Plan which (See map Fig 6) is at Reg 19 stage and enters Examination in Public on October 1st

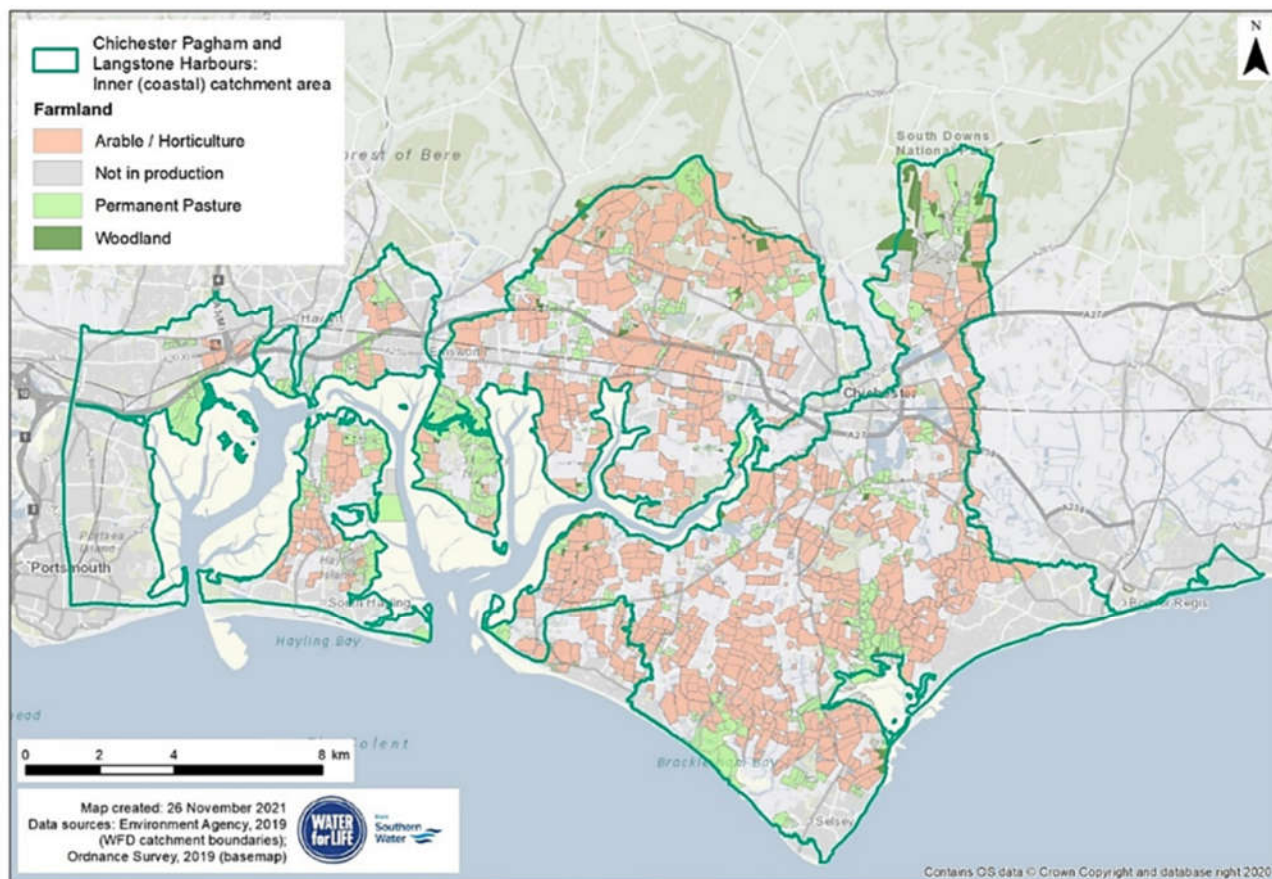


Fig 3: Designated sites and land use on the Manhood Peninsula

- 15.8** LPAs have a DUTY to conserve biodiversity, as stated in the Natural Environment and Rural Communities Act 2006 (NERC) and enhanced in the Environment Act and the National Policy Planning Framework, par 187 (NPPF):
- a) Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils

- b) Recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services
- c) Minimising impacts on and providing net gains for biodiversity including by establishing coherent ecological networks that are more resilient to current and future pressures.

15.9 The NPPF in paragraph 193 stresses that local planning authorities whilst determining planning applications they should apply the following principles:

(a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

(b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

(c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons, and a suitable compensation strategy exists; and

(d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

And in paragraph 194 makes it clear that the following should be given the same protection as habitats sites:

a) potential Special Protection Areas and possible Special Areas of Conservation;

(b) listed or proposed Ramsar sites; and

(c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.

16. There is a local Non-governmental Organisation (NGO) volunteer led, and a Registered Charity, Manhood Wildlife and Heritage Group (MWHG) established for 27 years which carries out work for wildlife.

16.1 The MWHG carried out species surveys around the relict canal at Mundham and the information gathered was submitted to the SxBRC. There are water voles England's rarest mammal, in this section of the Pagham Rife, up at Runcton, and in BMS, 2023.

16.2 When MWHG first managed Camic pond as part of the Fixing and Linking Our Wetland, FLOW project, water voles moved in before the group had a chance to finish the planned digging work. It demonstrated that they were in the adjacent ditches and moved in as soon some of the shading trees and brambles had been removed so that other plants started to flourish. See Figs 3, 4 and 5.

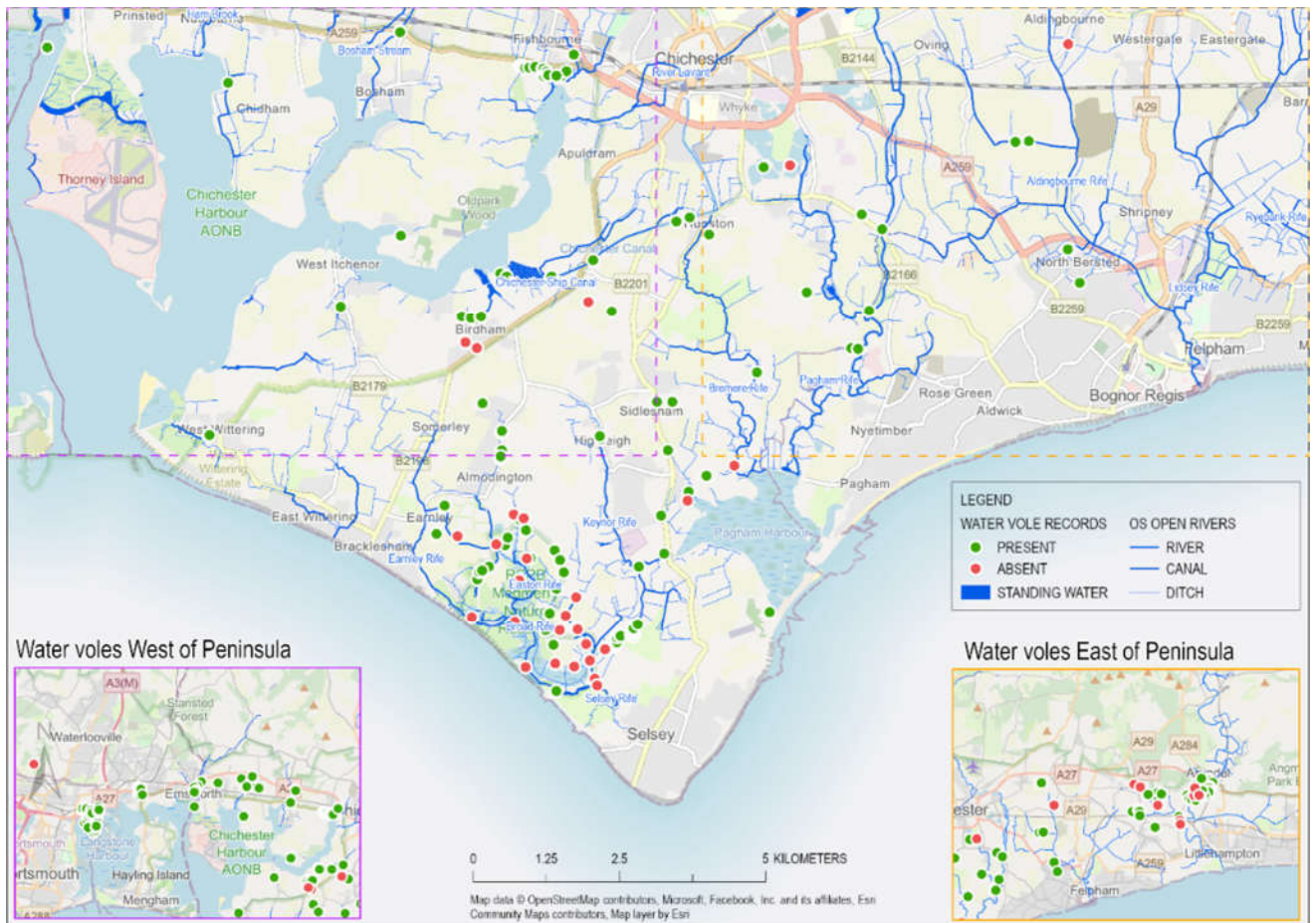


Fig 4: Distribution of Water Voles on the MP. Ref: MWHG



Fig 5: Red line showing Water Vole route



Fig 6: Water Vole latrine

THE CONSTRUCTION PROCESS AND ADVERSE IMPACT

17.

- involves pile driving thousands of two metres into the ground which causes significant noise, vibration and disturbance
- and the proximity to the rife and ditches is of real concern while this is taking place – a requirement for a minimum of 6-metres margin away from these waterways must be maintained to avoid crushing burrows where water voles live
- The debris, litter and pollution that often appears to be associated with all construction works, could end up in the ditches and margins thus attracting rats which could then predate water voles. This is a pristine and quiet stretch of waterway which, if disturbed, would adversely affect the wildlife.

17.1 It is not clear, given the proposed layout of the solar arrays, how access to maintain the channels will easily be conducted. Although the areas covered by the arrays maintain a grass area below their structures and this is promoted as providing an area with biodiversity; there are other areas where arrays are in a monoculture where little biodiversity actually occurs. No amount of screening will hide the visual impact of this huge industrial power plant in our countryside. As well as fields full of rows and rows of metal and glass solar panels perimeter security fencing is proposed – all in place for 40 years.

17.2 It would be inappropriate to develop renewable energy sites on land that provides important ecosystem services including habitats and carbon sequestration where the development would undermine these functions. The TCPA recommends a precautionary approach be taken to safeguarding such land where renewables might be unsuitable.

17.3 This application site is such a site as it lies within the buffer zones of a range of important protected sites with habitats and species which should not be disturbed or wrecked. The area has been subject to flooding last winter and historically over many years. Given climate change and more extreme weather conditions which are predicted, this will continue and potentially worsen (NRW/EA, 2013).

INTERNATIONAL POLICY

- 18.** 2021–2030 is the *United Nations Decade on Ecosystem Restoration*, with the primary aim being to prevent, halt and reverse the degradation of ecosystems worldwide. To be successful, civil society organisations must continue to:
- fight unsustainable exploitation of the natural world
 - explain what the new commitments that politicians are making mean in practice
 - make the case that the nature and climate emergency must be tackled together

- challenge those policies which are inconsistent with or undermine political rhetoric on the environment
19. The chair of the IPBES, Prof Sir Bob Watson (former scientific advisor to Department of Environment, Food and Rural Affairs, DEFRA) declared:
“The health of ecosystems on which we and all other species depend is deteriorating more rapidly than ever. We are eroding the very foundations of our economies, livelihoods, food security, health and quality of life worldwide.”
 20. **In 1992**, The Convention of Biological Diversity, CBD, an international treaty was agreed at the United Nations Earth Summit in Brazil. It has three goals: the conservation of biological diversity; the sustainable use of nature; and the fair and equitable sharing of benefits arising from genetic science.
 21. **In 2010**, under the CBD, countries agreed to the Aichi Biodiversity Targets – a group of 20 goals to conserve biodiversity that range from preserving species, to reducing deforestation by 2020. Aichi’s goals are to biodiversity what the Paris climate accord is to global warming (See **App 2**).
 22. *“We have no time to wait. Biodiversity loss, nature loss, it is at an unprecedented level in the history of mankind”*, Elizabeth Mrema, the Executive Secretary of the CBD.

LOCAL POLICY

23. The UK is one of the most nature-depleted countries in the world, failing right now to meet 17 out of 20 UN biodiversity targets and it is **not** on track to achieve its goal of providing the next generation with a better natural environment. The abundance and distribution of the UK’s species has, on average, declined since 1970 and many metrics suggest this decline has continued in the most recent decade. There has been no let-up in the net loss of nature in the UK. Prior to 1970, the UK’s wildlife had already been depleted by centuries of persecution, pollution, habitat loss and degradation (*State of Nature*, 2019). So, we must protect and safeguard what we have.
24. The most recent *State of Nature*, 2023, points to the UK’s wildlife continuing to decline with 1 in 6 UK species of wildlife being threatened with extinction. Climate and nature are two faces of the same problem and both need addressing.
25. **CDC EXTANT Local Plan** (updated plan subject to Examination in Public, started Monday October 1st. 2024 and the Environment section was considered on

November 13th. **This process needs to be completed for this policy so be validated.**

POLICY 49 of the CDC LP: ***Biodiversity***

This policy aims to protect and manage the District's network of ecology, biodiversity and geological sites, including the international, national and local designated sites (statutory and non-statutory), priority habitats, wildlife corridors and stepping-stones that connect them (see 10.2 above). Planning permission will be granted for development where it can be demonstrated that **all** the following criteria have been met:

1. The biodiversity value of the site is safeguarded;
2. **Demonstrable harm** to habitats or species which are protected, or which are of importance to biodiversity **is avoided** or mitigated;
3. The proposal has incorporated features **that enhance biodiversity** as part of good design and sustainable development;
4. The proposal protects, manages and enhances the **District's network of ecology, biodiversity and geological sites**, including the international, national and local designated sites (statutory and non-statutory), priority habitats, wildlife corridors and stepping stones that connect them;
5. Any **individual or cumulative adverse impacts** on sites are avoided;
6. The **benefits** of development **outweigh** any **adverse impact on the biodiversity** on the site. Exceptions will only be made where no reasonable alternatives are available; and planning conditions and/or planning obligations may be imposed to mitigate or compensate for the harmful effects of the development.

This application does not conform to this policy.

POLICY 52: Green Infrastructure

Development will be expected to contribute towards the provision of additional green infrastructure and protect and enhance existing green infrastructure.

Planning permission will be granted where it can be **demonstrated that all the following criteria have been met:**

1. The proposals maintain and where appropriate contribute to the network of green infrastructure i.e. public and private playing fields, recreational open spaces, parklands, allotments and water environments;
2. The proposals contribute to improving the health and well-being of the local and wider community;
3. Where appropriate, the proposals incorporate either improvements to existing green infrastructure or the restoration, enhancement or creation of additional provision/areas;
4. Where appropriate, the proposals incorporate either improvements to existing

- ecology and biodiversity or the restoration, enhancement or creation of additional habitat and habitat networks;
5. Where appropriate, the proposals incorporate either improvements to existing trees, woodland, landscape features and hedges or the restoration, enhancement or creation of additional provision/areas;
 6. The proposals do not lead to the dissection of the linear network of cycleways, public rights of way, bridleways and ecological corridors such as ancient woodlands, hedgerows, ditches and water environments.

Development that will harm the green infrastructure network will only be granted if it can incorporate measures that avoid the harm arising or sufficiently mitigate its effects.

**The solar application will damage the extant GI network
and permission should be refused**

26. Updated CDC Local Plan has reached regulation 19 consultation. A series of strategic corridors to assist wildlife have been introduced into the updated Chichester District Local Plan. Development proposals in or adjacent to areas identified as potential Strategic Wildlife Corridors as identified in the Strategic Wildlife Corridors Background Paper should demonstrate that they will **not** affect the potential or value of the wildlife corridor. [OBJ]

26.1 The policy CDC included in the updated Local Plan is designed to enable wildlife species to move between the SDNP and the MP. One of these includes the area around South Mundham based on wildlife evidence using the area. This network is based on the natural geography of the area and is designed to provide a sustainable minimum connectivity position regarding the position of each of the corridors (See Fig: 7).

26.2. These corridors provide a level of connectivity that can support and sustain the ecology of the Plan area and the wider district over the long term. The purpose of the policy is to safeguard wildlife-rich habitats and wider ecological Networks. Development should only be permitted where it would not create an adverse effect upon the ecological value, function, integrity and connectivity of the corridors. [OBJ]

Strategic wildlife corridor map

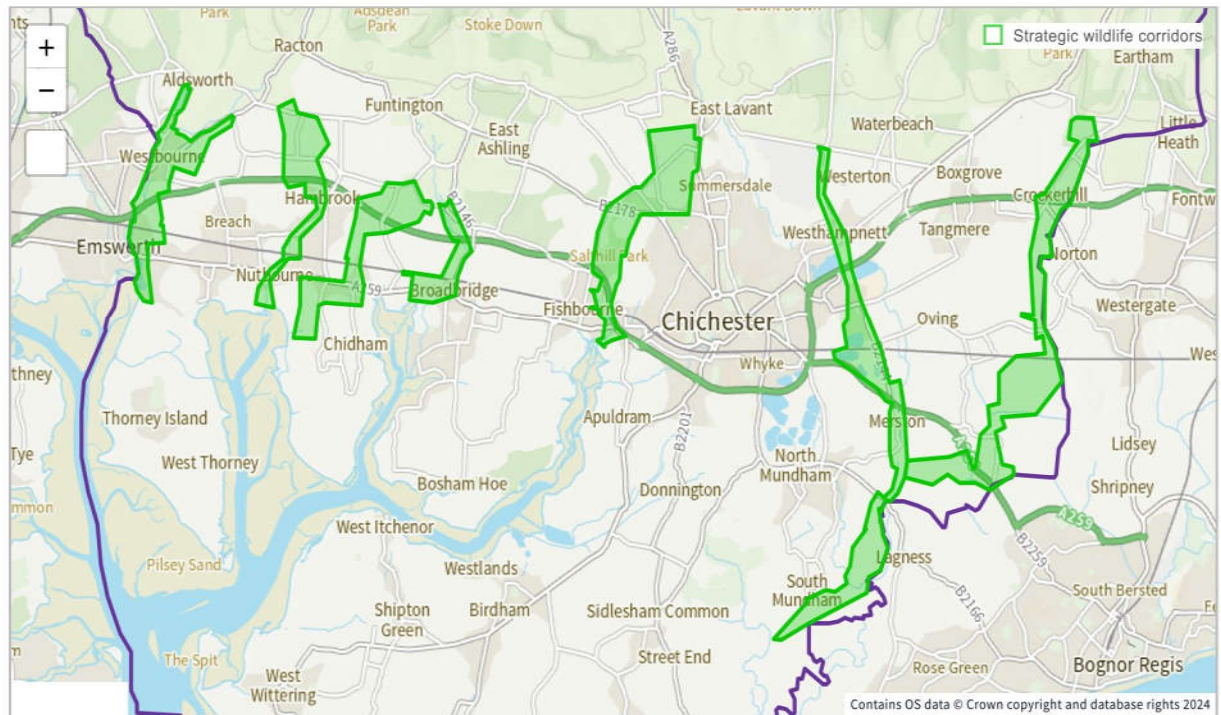


Fig 7: CDC wildlife corridors

Chichester District (CDC) Local Plan, **Policy NE 4 Strategic Wildlife Corridors** Sussex Wildlife Trust supported CDC's decision to identify and map Strategic Wildlife Corridors as part of the Local Plan process.

BIODIVERSITY AND SOLAR FARMS

27. An overview was provided by Natural England: *Biodiversity and solar farms* and one in 2024 by Solar Energy UK, *Solar habitat 2024: Ecological trends on solar farms in the UK*.

27.1 Natural England (NE) the government advisory body on wildlife recommends the avoidance of solar developments in or near to areas of high ecological value, NE 2011, TIN 101; and highlights that evidence is required before it can be stated that there will **not** be a significant adverse biodiversity impact from solar farms.

LOCAL ENERGY PLAN

28. In April 2019, West Sussex Council, WSCC, recognised the climate emergency and published a 10-year climate strategy as a clear commitment and framework for other policies. Some key points from the strategy are as follows:

- ♣ Aim to be carbon neutral by 2030, enabling positive actions and behaviours across the county to mitigate climate change.
- ♣ Promote and move to more local renewable energy sources instead of fossil fuels.
- ♣ Ensuring projects, plans and processes reduce carbon and are resilient to climate change

CLIMATE EMERGENCY

- 29.** Chichester District Council declared a Climate Emergency in July 2019 and a Climate Emergency Action Plan was developed. This outlined how the council will reduce its carbon emissions within the work that they do, and how they could work with others in the district to reduce emissions in the area.
- 29.1** The feed of energy into the grid at Hunston seems to be on a ‘first come’ basis and not essential - the alternative feed to the Mundham Food complex tends to reinforce this. The current value of the land is maintained as a wetland and mixed agricultural area as part of an important wildlife corridor network providing an important area of biodiversity must be given serious consideration over the proposed use.
- 30.** Plans are currently in draft or under consultation, for updating the policy however key themes are as follows:
- ♣ Implementing a funding scheme to support energy efficiency measures and new Renewable energy in the District.
 - ♣ Updating of planning policies, as part of the Local Plan review, to reduce carbon emissions from new developments
 - ♣ Improve sustainable transport links, especially walking, cycling and electric vehicle charging networks West Sussex Council’s climate strategy is expected to have a significant impact on demand growth within the area including Ashling Road. This impact is visible within the SEPD DFES projections.
- 31.** On the Peninsula increasingly, there is an expansion of ‘industrial’ agricultural and horticultural land use combined with an increase in other types of industrial land uses such as solar farms and this is changing the maritime open countryside character of the MP. These industrial uses fragment the ‘traditional’ agricultural / horticultural, woodland and wetland previously interconnected biodiverse areas and isolate the plant and animal communities that are present which can lead to a threat to their continued viability. Whilst reaching net zero carbon emissions is paramount it is questionable whether this location on balance offers the best overall advantage to future sustainability

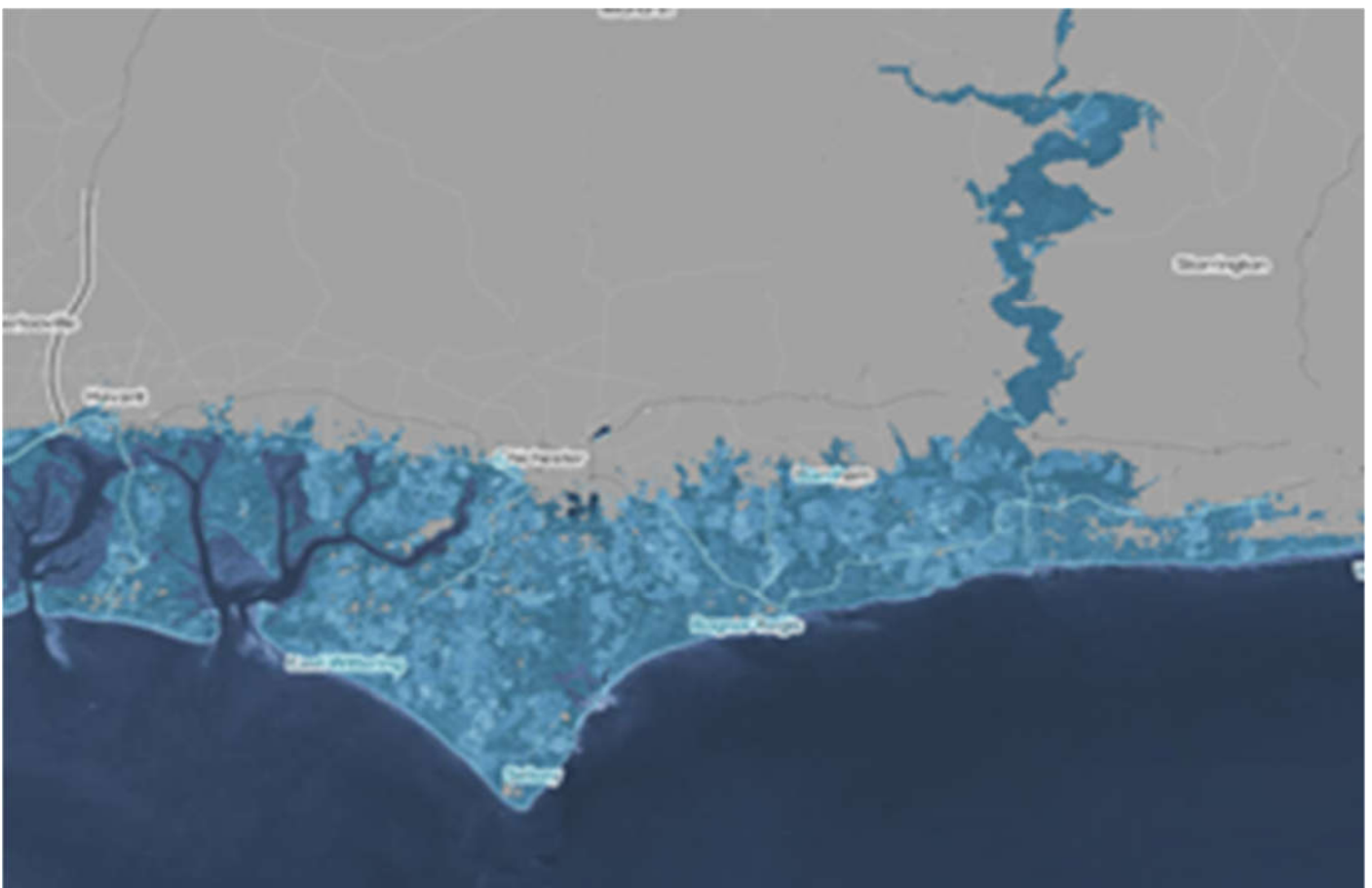
LAND USE

32. The importance of maintaining a balance between continued 'industrialisation' of land use on the Peninsula and non-intensive agricultural/ horticultural practices that promotes and supports biodiversity is a significant factor. It calls into consideration the importance of the overall character of the area and its capacity to absorb industrial land uses set against its highly significant and valuable/vulnerable natural environments

WATER AND FLOOD RISK

33. Surface Water Management Plan (SWMP): A long-term plan for managing flooding from surface water, such as sewers and drains becoming full, waterlogged ground, and groundwater flooding. The SWMP for the Manhood Peninsula was prepared by CH2M HILL on behalf of the council and issued in August 2015. At 2°C above historic levels SLR is predicted see below

Fig 8: Sea Level Rise (Ref. Surging Seas and NASA website)



ENERGY

34. The Chichester Harbour Conservancy (CHC) states in their management plan 2019-2024, that it is likely to support proposals for micro-renewable energy installations under the following criteria:
- To be **sited discreetly** or out of view from public vantage points; and
 - As far as practicable, to minimise their impact on the appearance of the installation on the site and/or building; and
 - To **be unobtrusive** in relation to the wider landscape setting; and
 - To operate at **noise levels** not exceeding 10dB(A) above background noise levels, within 50 metres of the installation.
- 35 CHC is likely to object to all other sized renewable energy installations due to the potential **detrimental visual and/or other impacts on the landscape of the Area of Outstanding Natural Beauty (AONB), now re-named as Protected Landscapes since Nov 2023 (CHC Management Plan, 2019-24).**
36. This application lies within 5km of Chichester Harbour and does not conform with these criteria.

RENEWABLE ENERGY

37. SOLAR OPTIONS IN CHICHESTER DISTRICT

Solar power has a small but growing role in electricity production in the UK. There were few installations until 2010, when the UK government man-dated subsidies in the form of a feed-in tariff (FIT), paid for by all electricity consumers. In the following years the cost of photovoltaic (PV) panels fell, and the FIT rates for new installations were reduced in stages until the scheme closed to new applications in 2019. As of 2023, over 14 Gigawatt (GW) had been installed, a third of which was rooftop solar.

38. In 2002, the annual generation was 14 TWh; in 2022 (4.3% of UK electricity consumption) and peak generation was more than 11 GW. PV panels have a capacity factor of around 10% in the UK climate. Home rooftop solar panels installed in 2022 were estimated to pay back their cost in 10-20 years.
39. Southern England has one of the best sunshine records in mainland UK, these being the coastal resorts of Sussex and Hampshire, high quality farmland for growing crops and a range of internationally designated wildlife sites and the regular use of Selsey Bill as a migration site for Bats, Birds and Butterflies arriving or departing the UK.
40. Information was provided to CDC by the Energy Working Group (CDREWG) on establishing a renewable energy target for the District In 2021. The reduction in

carbon intensity of the energy being used was published by BEIS, in the D2018 UK greenhouse Gas emissions.

- 41.** According to Solar Energy UK, a trade body, there are proposals that Communities affected by a rapid expansion of solar energy projects are set to receive annual payments in a scheme that is expected to be finalised by the end of this year, 2024. Residents near solar farms will get payments from developers under plans to appease homeowners.
- 42.** This is one of the very few areas on the south coast of England to retain some aspects of tranquillity. (*WSCC Management Guidelines*). This factor was amplified during the pandemic when many people found new places to walk and experience the sounds of birds singing etc. which they could now hear. The application site is contained within this area.
- 43. Tranquillity**
“Tranquillity is a natural resource, and an essential quality of the countryside. It is a much-valued aspect of human experience that the Council for the Protection of Rural England, CPRE, has long championed. Although found in many places, it is the countryside that gives us the best chance to experience it. With its broad views, woodlands and heaths, wildlife, the sounds of nature, massive skies, and open water, the rural environment offers us many opportunities to experience deep tranquillity. It enables us to appreciate the beauty and harmony of the natural world. Tranquillity is a central part of why the countryside matters deeply to so many people and the reason many want to spend time there.”
- CPRE Tranquillity Map
Report 2015*
- 44.** `The solar industry is working with the Government to flesh out the details of the “community benefits” funds which could be administered by local councils or trusts. Councillors in the West Lindsey district of Lincolnshire, where five solar projects are being planned despite local opposition, said generous contributions were needed to compensate for negative impacts on the countryside. They urged the Government to go further by offering residents direct payments in the form of reduced energy bills, which has been proposed by Octopus Energy, the UK’s largest energy supplier.

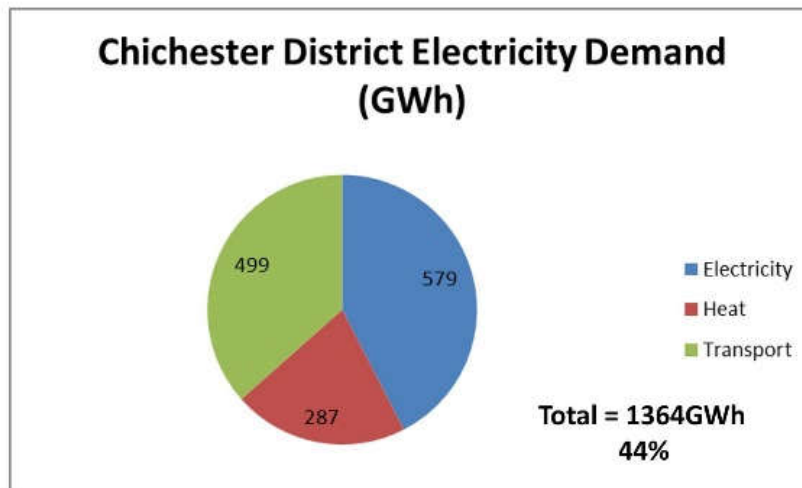


FIG 9: Electricity demand

Information
supplied by
CDREW , 2021

45. In examining setting a target for Chichester District the issues considered were:
- Meeting the entire energy demand within the District by renewable energy
 - Allocating the independent CCC 6th Carbon Budget renewable energy target based on:
 - Area
 - Grandfathering⁴

46. The energy demand in Chichester District (Consumption 2018, GWh) is **3099 GWh** composed of petroleum products (1509), Gas (1012) and Electricity, (579) (<https://www.gov.uk/government/statistical-data-sets/total-final-energy-consumption-at-regional-and-local-authority-level>).

ELECTRICITY DEMAND

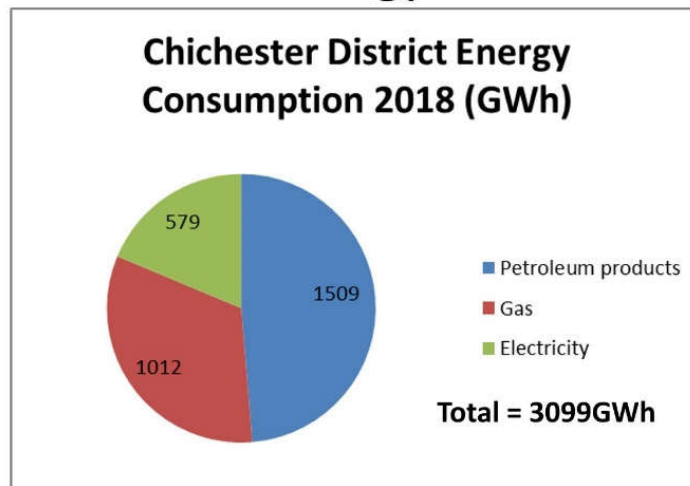
47. And naturally electricity will more than double in the period to 2050, reflecting an electrification of sectors across the economy.
<https://www.theccc.org.uk/wp-content/uploads/2020/12/Sector-summary-Electricity-generation.pdf>

48. There are two types of solar panels:
- Some produce **hot water** – known as solar thermal panels

⁴ New legislation does not apply to something set up in a previous arrangement.

What is energy demand?

- Others



<https://www.gov.uk/government/statistical-data-sets/total-final-energy-consumption-at-regional-and-local-authority-level>

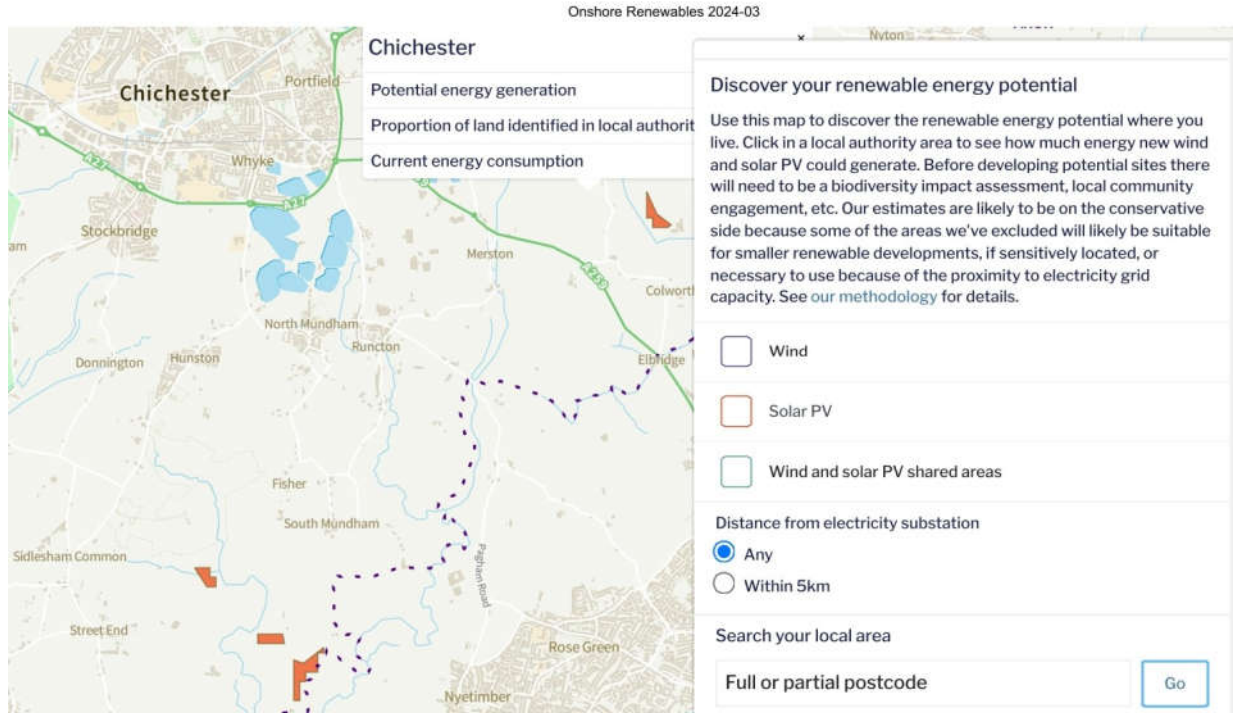
generate **electricity**— known as photovoltaic or ‘PV’ panels

49. The energy demand in Chichester District (Consumption 2018, GWh) is 3099 GWh composed of petroleum products (1509), Gas (1012) and Electricity, (579) (<https://www.gov.uk/government/statistical-data-sets/total-final-energy-consumption-at-regional-and-local-authority-level>). Information supplied by BREWG. And naturally electricity will more than double in the period to 2050, reflecting an electrification of sectors across the economy. <https://www.theccc.org.uk/wp-content/uploads/2020/12/Sector-summary-Electricity-generation.pdf>

ENERGY DEMAND

50. CDC needs to explore a range of options for alternative renewable energy to meet the demand and solar roof top options offer a practical option.
51. Friends of the Earth (FoE) drew up a map of potential renewable energy potential in the UK taking a conservative approach excluding areas such as national parks and areas of outstanding natural beauty, sites protected for their wildlife value, the best farmland, and sites near houses
- 51.1 FoE teamed up with researchers at the University of Exeter to identify the land that could be most suitable for new onshore renewable energy in England. Note on the map produced for the area under consideration there is very capacity which would be

suitable in the vicinity of South Mundham. Solar capacity is marked in red on the map. See **Fig 10** below.



10: FOE Map of renewable energy potential demonstrates no suitable sites in South Mundham.

52. There are many aspects which render this site inappropriate for development and the application should be **REFUSED**.

APPENDIX 1: CPRE STATEMENT on SOLAR ENERGY

<https://www.cpre.org.uk/resources/statement-on-solar-energy/#>

Appendix 2: UN Sustainable Development Goals

The Sustainable Development Goals are the blueprint to achieve a better and more sustainable future for all. They address the global challenges we face, including poverty, inequality, climate change, environmental degradation, peace and justice

The Sustainable Development Goals (SDGs) or Global Goals are a collection of 17 interlinked global goals designed to be a "blueprint to achieve a better and more sustainable future for all".[1] The SDGs were set up in 2015 by the United Nations General Assembly (UN-GA) and are intended to be achieved by the year 2030. They are included in a UN-GA Resolution called the 2030 Agenda or what is colloquially known as Agenda 2030.[2] The SDGs were developed in the Post-2015 Development Agenda as the future global development framework to succeed the Millennium Development Goals which ended in 2015.

Relevant SDG goals to this application are highlighted in red.

The 17 SDGs are:

- (1) No Poverty,
- (2) Zero Hunger,
- (3) Good Health and Well-being,
- (4) Quality Education,
- (5) Gender Equality,
- (6) Clean Water and Sanitation,
- (7) Affordable and Clean Energy,**
- (8) Decent Work and Economic Growth,
- (9) Industry, Innovation and Infrastructure,
- (10) Reduced Inequality,
- (11) Sustainable Cities and Communities,
- (12) Responsible Consumption and Production,
- (13) Climate Action,**
- (14) Life Below Water,**
- (15) Life On Land,**
- 16) Peace, Justice, and Strong Institutions,
- (17) Partnerships for the Goals.**

The resolution identifies specific targets for each goal, along with indicators that are being used to measure progress toward each target.[3] The year by which the target is meant to be achieved is usually between 2020 and 2030.[4] For some of the targets, no end date is given.

To facilitate monitoring, a variety of tools exist to track and visualize progress towards the goals. The intention is to make data more available and easily

understood of the SDGs. There were serious impacts and implications of the COVID-19 pandemic on all 17 SDGs in the year 2020.

REFERENCES

Amber listed, Species on the amber list have a moderate decline in population or range or are rare breeders. They may also have populations that are localized or internationally important.

Birds of Conservation Concern 5, JNCC et al, 2023

BNG, Biodiversity Net Gain, Natural England metric 4

CDC *Local plan and updated plan, 2021-2039* and Local Plan Regulation 19I *Climate change and natural environment*

CDC wildlife corridor paper *Strategic wildlife corridors - Local Plan Review Background*

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Centre for Sustainable Energy, Bristol, and TCPA 2023 *Spatial Planning for Climate Resilience and Net Zero*

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Evidence submitted by the applicant

Holbury Consultancy Service, June 2024, FINAL, *South Mundham Solar Farm, West Sussex, Shadow Habitats Regulations Assessment*.

ICZM 2011 on the Manhood Peninsula, Produced by: Chichester Coastal Change Pathfinder Project on behalf of the Manhood Peninsula Partnership, in conjunction with Chichester District Council 2011

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Langmead + BNRG Langmead Ltd, Application materials

MWHG site works

Manhood Peninsula Partnership, *Sustainable Transport on the Manhood Peninsula* (STOMP), Partly funded by the European Agricultural Fund

Natural Environment and Rural Communities, NERC Act 2006

National Planning Policy Framework, NPPF, extant and subject to current consultation

Red listed: bird species that are globally threatened whose population/range has declined rapidly in recent times or that have declined historically and not shown recovery as categorised by the British Trust for Ornithology, BTO

Solent Maritime SAC (Special Area of Conservation) under the EU Habitats Directive

Solar: Habitat 2024: Ecological Trends on Solar Farms in Britain

Solar Energy UK has recently published research that states, “solar farms can become havens for biodiversity, playing an important role in nature restoration across the country.” For many of the UK's solar farms, the opportunity for biodiversity net gain lies between the panels where species-rich grassland can be managed.

South Mundham Neighbourhood Plan

SxBRC Report

SxBRC map of Protected Sites

Sussex Biodiversity Opportunity Areas map

TCPA comments concerning Climate change questions 72-81 on *the National Planning Policy Framework, NPPF, Consultation document 2024*

UK National legislation

WSCC Climate Change Strategy 2020-2030

WWF, State of Nature Partnership, 2023, *State of Nature National Preparedness*

Commission report: ‘Just in Case: 7 steps to narrow the UK civil food resilience gap, published on February 6, 2025.