

Westhide Solar Power Proposal: Statement of Community Involvement

Application submitted by Ersun (Westhide SPV) Ltd

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Contents

1.	Introduction	page 3
2.	Project overview	page 4
3.	Herefordshire Council Statement of Community Involvement	page 6
4.	Consultation & communications programme at Westhide	page 11
5.	Key issues at Westhide	page 15
6.	Impact of consultation on the development	page 16
7.	Conclusion	page 19

List of Tables

Table 1:	Engagement method
Table 2:	Applicant adherence to HC-SCI
Table 3.	Consultation programme at West

- Table 3:Consultation programme at WesthidTable 4:Impact of consultation on key issues Consultation programme at Westhide

Appendices

- Appendix 1 Project website (landing page)
- Appendix 2 Announcement letter (text)
- Project brochure Appendix 3
- Appendix 4 Consultation update (June 2021)
- Draft design (October 2021) Appendix 5
- Consultation update (October 2021) Appendix 6
- Noise assessment (October 2021) Appendix 7
- Appendix 8 Screening planting consultation (October 2021)
- Appendix 9 Access route/traffic management consultation (October 2021)

1. Introduction

Ersun (Westhide SPV) Ltd (the applicant) is submitting a planning application for a groundmounted solar power proposal on land to the north-west of Westhide, Herefordshire. The proposal is for a scheme of approximately 34.6 megawatts (MW) of installed capacity on land that forms part of the Westhide Estates.

The planning application is required to be supported by a range of documents and assessments to enable the determining authority (Herefordshire Council) to make a decision on the proposal, supported by a full suite of information.

Pre-application consultation has been undertaken with relevant officers from Herefordshire Council, alongside a range of statutory and non-statutory consultees, including the local community.

This document is the Statement of Community Involvement (SCI) submitted in support of this application. Other documents that accompany this application are listed below:

- Application Form & Ownership Certificates
- Agricultural Land Classification
 Report
- Arboricultural Report
- Core Strategy Policy SS6 and LD2 Biodiversity & Ecology measures compliance checklist
- Biodiversity Net Gain
- 3.0 Metric Westhide BNG
- Community Infrastructure Levy (CIL) – Planning Application Additional Information Requirement Form
- Core Strategy Policy SS7 and SD1 Climate Change Measures compliance checklist
- Confidential Badger Report to follow
- Construction Traffic Management Plan
- Cumulative Impact Assessment to follow
- Design & Access Statement
- Ecological Appraisal

- Flood Risk Assessment
- Heritage Desk Based Assessment
- Landscape & Visual Impact
 Assessment
- Landscape Environmental Management Plan – to follow
- Solar Type 3 Visualisations
- Landscape Mitigation & Enhancement Plan (including insets 1-3)
- Natural Assets & Environmental Gain Report
- Noise Impact Assessment
- Planning Statement
- Topographical survey
- Site location plan
- Site masterplan
- PV mounting system detail
- CCTV detail
- Fencing & gate detail
- Transformer substation detail
- Access track detail
- Inverter detail
- Spares container detail

3 Westhide Solar Power Proposal Ersun (Westhide SPV) Ltd

December 2021

2. Project overview

The proposal at Westhide is for a ground-mounted solar power schemes of approximately 34.6 megawatts (MW) of installed capacity. A site of this size would be expected to generate approximately 36,300 MWh of green electricity per year – enough to power over 12,500 medium-usage UK households (and equivalent to around 38% of the number of households in the Hereford locality). This would also displace around 8,400 tonnes of CO2 every year.¹

The site consists of eight arable fields, access tracks, a permitted path and incorporates some of the woodland within and at the boundaries of the site, to ensure protection and management for screening purposes. The site totals approximately 152.5 acres combining all these elements.

As well as the solar panels installed on steel frames, the proposal includes approximately 14 central inverters, a substation compound, security fencing and CCTV cameras.

Ecological protection and enhancement measures, additional screening planting and the inclusion of a new permissive footpath ensure that the site will have a minimal impact on residential amenity and bring additional benefits, such as improved biodiversity and an increase in public access across private land.

¹ The environmental benefit figures are based on 34.6MW of installed solar PV, operating with a 12% capacity factor, a Typical Domestic Consumption Value (TDCV) for a medium-use household of 2900kWh per annum (Ofgem 2020), UK government figures on the carbon emissions for homes on the average energy fuel mix (2019) and 2011 Census figures.

Site location map and masterplan



3. Herefordshire Council Statement of Community Involvement

Herefordshire Council's Statement of Community Involvement (HC-SCI) was adopted in December 2016. The HC-SCI sets out how the Council will engage with the community in respect of planning matters and how it will build on existing consultation mechanisms to continue to make community involvement more effective.

The HC-SCI states that the Council has a strong commitment to community engagement and has adopted the following objectives through its Strategy for Community Involvement:

- Purpose should be clear
- Consultation should be well planned, timely and inclusive
- Methods should be appropriate and well-managed
- Relevant documentation should be accessible to all, so opinion is fully informed
- Decisions should be based on all relevant evidence
- Results should be acknowledged and fully considered
- Accessible feedback should be given
- Effectiveness should be evaluated
- Opportunity should be given to public wherever possible to register ongoing interest

3.1 Community involvement in the planning application process

The HC-SCI includes a section on community involvement in the planning application process, where the Council sets out how residents can find out about and get involved in the planning application process in Herefordshire.

Herefordshire Council is responsible for the processing and decision making of planning applications. This work, which is undertaken by the development management team, involves handling a wide range of planning and related applications ranging from house extensions to large housing and employment development and minerals and waste proposals.

3.2 Finding out about planning applications

When a planning application is received, the Council is first required to confirm that it is a *valid* application; that is, to check that it contains all the correct documentation. Once the application is confirmed as being valid (and is 'validated') the Council are required to carry out certain publicity:

- Planning applications online Details of all applications that are received are displayed on the Council website. During the processing of the application these details are updated with any new information received, such as consultation responses. The record will include the officer's or Planning Committee report, the decision notice, the discharge of conditions and any subsequent appeal.
- Site notices For every planning application at least one site notice will be displayed; in some cases, there will be more than one notice. The notices are coloured yellow and are displayed at public vantage points on and/or near the site.
- **Press notices** Certain types of application will additionally be advertised in the local press. Currently the adverts are placed in the Hereford Times. These include applications for sites with an area of one hectare or more and those which are likely to be of a wider community interest.
- Weekly lists A weekly list of applications received is available on the Council website.
- **Parish council notification** The local council are notified of all applications within their area. Neighbouring parishes are consulted on applications where it is considered they will be impacted.

Methods	Main considerations
Council website	Information can be provided quickly and efficiently and accessed by the public from their own home or office at a time which is convenient to them. This can overcome the problems of trying to consult over dispersed rural communities. However, access to the internet is not universal and therefore may disadvantage certain groups. The Council has web access at all Customer Service Centres and libraries and will continue to consider ways in which access to web based information can be improved. Web pages should be user friendly. Use is likely to continue to increase.
Email	Information and responses can be provided quickly and efficiently. Increased use of this means of communication is sought with Town and Parish Councils, specified consultees and all other parties will be communicated in this way wherever possible. Every effort will be made to gather and maintain email addresses, unless an individual specifies otherwise.
Social media	Use of sites such as Facebook and Twitter keep users informed with regular updates for low cost. Likely to be utilized as a means of keeping people informed, rather

Table 1 sets out engagement methods used by Herefordshire Council.

7

	than a formal part of consultation. Still many people not using these mediums. Therefore, where appropriate, pages should be referred to on literature & website to raise awareness.
Formal advertisements in local press	Statutory requirements to publish notices advertising certain planning applications. It is cost effective in terms of bringing local issues into the broader local arena. Releases will be sent out to all major county publications. Items may only be reported if they are considered newsworthy by the newspaper editors, therefore publication is not guaranteed.
Consultation documents	Traditional means of consultation and the information
available for sale, CD or	supplied can be in detail. Information needs to be in plain
inspection at Council offices,	English with simplified formats. Due to limitations for
by post and on the web	people with mobility or sight disabilities and where
	English is not a language that is understood, modified
	versions need to be made available at no extra cost to the individual.
Leaflet, newsletters and	Can publicise and explain in simple language and invite
brochures	comment. The Parish newsletters are a good
	communication link and should be utilised where
	appropriate. Newsletters can be sent to all residents;
	however, may be viewed as junk mail and disregarded.
	Can be expensive to distribute.
Formal written letter	Letters will be sent when there is no other means of
	communication or a person has requested to be written
	to by post specifically. High postage and administration
	costs.
Public Exhibitions/Public	Can be used to circulate information, seek views and
meetings/presentations	endorse proposals. Gives residents some flexibility in
	deciding when to visit and can encourage feedback. Takes planning issues to the people and provides an opportunity
	for people to discuss local issues directly with planning
	officers in an environment which local people will be
	familiar and therefore comfortable with. However, people
	attending may not be representative of the whole
	community and there is no guarantee of turn out. High
	staff and material costs. Countywide consultations
	require extensive coverage and numbers of events.
	Displaying information in local shops where people
	frequent should be considered as an alternative, where
	appropriate.
Notices displayed on a site	Direct and local notification of proposals to those around
	a site and in local area, however notices can be

	vandalised or removed before the end of consultation
	period.
Through partnership	Useful for topic based discussions and to find out what
organisations and focus	specific groups feel. Provides opportunity to discuss issues
groups, existing	in depth and to have ongoing dialogue. However high
forums/panels	direct costs of facilitating. Important to build on existing
	networks rather than reinvent with new ones.
Councillor networks	Councillors play a very important role in terms of
	community engagement. They are a recognised point of
	contact for the local community to go to with regard to
	Council matters. It is vital to ensure that Councillors are
	kept well briefed.
One to one meetings and	Useful for seeking views from targeted groups/individuals
briefings	however they are time consuming and require costly staff
	resource.
Parish and Town Council	If Town and Parish Councils are effectively involved with
networks	consultation exercises they can provide an invaluable
	contact with local communities. Many have developed
	their own websites and social media pages and should be
	used as a platform to provide information relevant to
	parish residents. There is also opportunity to assist in the
	preparation and distribution of consultation material e.g.
	on town, parish and village notice boards and other
	locations deemed appropriate.
Questionnaire/surveys	Enables quantifiable information to be collected.
	Questionnaires need to be well designed. There is no
	guarantee of response rate. Likely to be time consuming
	and costly.
Workshops	Organised discussion-based event to present and gather
	information. Can be targeted at key stakeholders.
	Requires skilled facilitators to ensure objectives are
	achieved. Requires costly staff resource.

Table 1. Engagement Methods

3.3 Commenting on a planning application

Members of the local community can comment on active planning applications. This can be done in the following ways:

- Using the online comment form on the Council's website
- By emailing planning_enquiries@herefordshire.gov.uk
- By writing to Planning Services, PO Box 230, Hereford HR1 2ZB

3.4 Relevant planning matters

With respect to commenting constructively on planning applications, planning matters that are considered relevant include:

- Planning policy
- The design and visual impact
- The impact on privacy/daylight/sunlight
- Environmental factors noise, smell, pollution
- The economic benefits
- Highway issues access, traffic, parking
- Impact on the landscape and ecology (nature conservation)
- Impact on the historic environment, heritage assets and their setting

Matters which are not normally relevant include:

- Loss of a view
- Impact on property value
- Land ownership/property covenant
- Effect on trade/competition
- Personal circumstances of the applicant (except in exceptional circumstances)
- The number of representations

Any comments stakeholders may wish to make should be received within the time period which will be specified on the website or the site/press notice and will be open to public inspection. All comments made are taken into account in the making of the decision.

3.5 Significant planning applications

There will be certain developments which in the view of the Council are likely to generate public interest which should be canvassed prior to any formal application. This includes applications where development is on a site greater than 1 hectare. The Council strongly encourages applicants to involve the community for these types of application.

In the Council's view, the duties of an applicant include:

- Identify groups and/or individuals who should be involved
- Agree a method for their involvement
- Agree a timetable for their involvement
- Set out how any feedback from the consultation will be assessed
- Identify where the feedback has resulted in a revision to the proposal
- Include in the planning application a statement on the consultation exercise

10

Westhide Solar Power Proposal Ersun (Westhide SPV) Ltd December 2021

4. Consultation & communications programme at Westhide

4.1 TEKSS Ltd

Community consultation for the solar power proposal at Westhide was undertaken by TEKSS Ltd, one of the owners of Ersun (Westhide SPV) Ltd and the company leading on the development of the proposal.

Inclusive and transparent communications lie that heart of the TEKSS approach to development. The development team has worked at the forefront of consultation best practice for many years and understands the critical value of well-conducted, thorough and inclusive consultation.

TEKSS uses a variety of consultation and communications tools and approaches, including:

- Project websites
- Letters
- Meetings & presentations (online and in-person)
- Public exhibitions
- Online consultation
- House visits
- Site visits
- Questionnaires
- Webinars
- Phone calls and emails

4.2 Impact of Covid-19

Some of the tools and methods were unavailable at the start of the consultation programme for the Westhide proposal due to Covid-19 restrictions that were in force at the time and all consultation was taking place remotely in this period (April 2021). However, as soon as Government guidance allowed it, in-person consultation resumed (May 2021).

4.3 Duties of an applicant

Table 2 sets out how TEKSS Ltd has ensured that its approach to consultation of the local community has adhered to the principles set out by Herefordshire Council in the HC-SCI.

Duty	How applied
Identify groups and/or individuals who should be involved	Prior to commencing consultation TEKSS Ltd carried out a stakeholder mapping exercise, with input from the landowner of the site.
Agree a method for their involvement	As an initial priority TEKSS Ltd sought to establish awareness of the proposal amongst local residents and councillors and to create communication channels to ensure that the local community had a direct point of contact for any project queries. The focus then became seeking input into the assessment and design processes of the scheme.
	The method for this was a mix of consultation tools and approaches as used by TEKSS Ltd (section 3.1), including letters, phone calls, onsite meetings, a project website, house visits and in-person consultation events.
Agree a timetable for their involvement	The intention was to consult the community from the early stages of the assessment process, allowing for ample time and opportunity to become involved in the development and design of the project.
Set out how any feedback from the consultation will be assessed	The purpose of consultation was not only to inform the local community of the project itself and the work being undertaken to develop it, but also to seek views of the community on the project, its (evolving) design, proposed mitigation measures and to find out any issues that were of material concern in order that they could be addressed from the outset.
Identify where the feedback has resulted in a revision to the proposal	Please see section 5.
Include in the planning application a statement on the consultation exercise	Please refer to this SCI.

Table 2. Applicant adherence to HC-SCI

4.4 Consultation and communications programme at Westhide

Table 3 sets out the programme of consultation and communications actions that were undertaken as part of the consultation efforts at Westhide.

Date	Action
21 st April 2021	Letters and a project brochure were sent out to approx. 50 local residents living in the vicinity of the site and within Westhide village to inform them of the proposal and inviting queries and questions.
	Letters and brochures were also sent out to the relevant ward councillor and the relevant parish council, offering meetings.
	The project website went live, containing relevant project information.
April 2021	The development team engaged with a number of local residents via phone calls and emails in response to the announcement letter.
19 th May 2021	Two site walkovers were organised with approximately 30 local residents and a few parish councillors (from Withington Group Parish Council) attending.
5 th June 2021	Two councillors (Herefordshire Council), including the relevant ward councillor, attended a site walkover to find out more about the proposal.
7 th June 2021	A consultation update was sent out to residents and other stakeholders (and a copy uploaded to the project website) providing responses to queries that were raised during the site walkovers.
May-November 2021	The development team continued to engage with residents and councillors directly, responding to additional queries and follow-up questions.
20 th October 2021	Consultation drop-in event held in Withington to present stakeholders with a draft site design, alongside draft proposals for screening planting and draft construction traffic management measures.
December 2021	A consultation update to be sent out with details of the final design and information on how further feedback has been incorporated.
January 2022 (tbc)	A public exhibition to be held in Withington Village Hall to present the final planning application and the supporting

assessments to the local community once the planning
application has been validated.

Table 3. Consultation programme at Westhide

4.5 Going forward

It is envisaged that the project team will continue to consult and liaise with local stakeholders during the post-submission period and beyond (including through the construction period, should the planning application be approved).

5. Key issues at Westhide

During the consultation process (April 2021 onwards) members of the local community have raised a number of issues and questions in relation to the project itself (including the design & scale of the site), the way it was being assessed and the impacts on the local community both during construction and beyond, during the operational phase.

This was done by letter, email, phone call and in person during site visits and other consultation events.

The main issues of material concern to the residents with respect to the assessment, the design and the construction and operation of the project were:

- Landscape & visual impact A number of residents expressed concern about the scale of the proposal and its potential visibility from particular viewpoints, including properties.
- Noise A few of the nearest residents expressed particular concern about potential noise from the central inverters and the substation compound impacting ambient background noise levels.
- **Construction traffic** Residents were particularly concerned about the potential use of Withies Road for construction traffic, in particular in relation to the use of larger delivery vehicles and potential impacts on other (recreational) road users.
- **Grid route** Several residents expressed concern about potential disruption to existing road users if the connection cable (between the site and its grid connection point in Dormington) were to be installed solely along the highways network.
- **Community benefits** Several residents raised the issue of the project providing more tangible and direct benefits to the immediate community.

Questions were also asked about impacts on listed properties, the decommissioning process, land grade, the energy/carbon payback of the solar panels/the project, the ecological impacts and benefits of the proposal, impacts on house prices, impact on flood risk and more.

However, it is the 5 key issues identified above that raised the largest number of queries.

6. Impact of consultation on the development

The main purpose of the consultation carried out by TEKSS Ltd was to establish as early on as possible the key points of concern for the local community in order that the development team could seek to address these concerns and incorporate relevant considerations from the outset.

Table 4 sets out how the key issues identified in section 4 have been addressed as part of the development of the proposal at Westhide.

Concern	How addressed/how impacted the development
Landscape & visual impact	Although field selection for the site already reflected the careful consideration of the topography of the land (i.e. certain fields that had been assessed in the very early stages of development were discounted due to potential visual impact on properties), views on this issue were sought, in particular in relation to the use of proposed mitigation measures such as hedgerow height management and the use of additional screening planting.
	Local residents were consulted on draft screening planting proposals in October 2021 and suggestions were then further incorporated into the final masterplan, as well as the Landscape & Ecology Maintenance Plan.
	It was also agreed that central inverters would be placed as far north as possible to mitigate views from the south of the site, and as far west as possible to mitigate views from the east.
	The design team sought to take advantage of the existing planting as much as possible for screening purposes whilst still adhering to the full range of technical constraints on central inverter locations.
	As a direct result of consultation, the final design also incorporates a different location for the substation compound, locating it further away from residential properties.
Noise	Due to the distances involved between the proposed substation compound location (alongside the likely

16 Westhide Solar Power Proposal Ersun (Westhide SPV) Ltd December 2021

	central inverter locations) the development team were confident (based on years of experience of designing and developing solar sites) that noise from the substation and central inverters (produced by their internal cooling fans) would not pose an issue for existing background noise levels as experienced at third-party residential properties.
	To further ensure this, it was agreed that all central inverters would be micro-sited as far away as possible from residential properties.
	In addition, because some of the residents living closest to the site expressed particular concern on the issue, in order to assuage concerns, the development team offered to carry out a full noise assessment for the site. This included the measurement of existing background noise levels at a number of local residential properties and a noise modelling exercise based on a range of technical options, to ensure a range of equipment was accounted for.
	Findings from the noise assessment were then fully incorporated into the final site design.
Construction traffic	The use of Withies Road for all construction traffic proved to be particularly worrying for nearly all the residents that were involved in the consultation. As a result, the development agreed to explore ways of minimising the use of that road as much as possible. The development team ultimately found and secured
	an option for avoiding the use of Withies Road for the vast majority of construction traffic, by introducing an alternative main construction access route from the north-west of the site.
	This resulted in the proposed use of Withies Road to being downgraded for use as a supplementary route, as well as for the delivery of the transformer, and for operational/maintenance traffic once the scheme is constructed.
Grid route	In relation to traffic and transport, some residents also expressed concern about the potential impact of laying the connection cable along the local highways network.

	The development team has sought to engage with landowners along the grid connection route to find opportunities for the cable to be laid across agricultural land where possible, with the view to reducing the length of cable to be laid along the highways system. This process is ongoing.
Community benefits	During the consultation process a number of residents raised the issue of the project having more tangible benefits for the immediate community.
	At the same time, a number of residents expressed a wish that further public access opportunities were available on estate land.
	The landowner of the site has from the outset expressed an interest in providing increased public access as a benefit of the scheme. Bearing this mind and taking on board comments from residents the development team sought to offer a permissive path as part of the proposal.
	Residents were consulted on the routing of the proposed permissive path pre-submission.
	In addition, and as a result of consultation, a community benefit fund is being proposed to accompany the project. As community funds are not considered material to the consideration and determination of planning applications (and bear no relation to the design changes), no further detail is provided here.

Table 4. Impact of consultation on key issues

7. Conclusion

The Applicant has undertaken a comprehensive programme of public consultation during the development of this proposal. Public engagement has been successful insofar as all key stakeholders were identified and engaged from the outset and feedback from the local community materially influenced the final design of the scheme.

TEKSS Ltd will continue to liaise with the local community throughout the planning and postplanning stages (including construction, if successful) to ensure concerns continue to be dealt with in a timely and effective manner.

> 19 Westhide Solar Power Proposal Ersun (Westhide SPV) Ltd December 2021