



Statement of Community Involvement Addendum

Derril Water Solar Farm

13/07/2021



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NEO ENVIRONMENTAL LTD

Head Office - Glasgow:

Wright Business Centre, 1 Lonmay Road, Glasgow. G33 4EL

T 0141 773 6262

E: info@neo-environmental.co.uk

Warrington Office:

Cinnamon House, Crab Lane, Warrington, WA2 0XP.

E: info@neo-environmental.co.uk

T: 01925 661 716

Ireland Office:

Johnstown Business Centre,
Johnstown House,
Naas,
Co. Kildare.

T: 00 353 (0)45 844250 E: info@neo-environmental.ie

Rugby Office:

Valiant Suites,
Lumonics House, Valley Drive,
Swift Valley, Rugby,
Warwickshire, CV21 1TQ.
T: 01788 297012

E: info@neo-environmental.co.uk

Northern Ireland Office:

Unit 3, the Courtyard Business Park,
Galgorm Castle, Ballymena,
Northern Ireland,
BT42 1HL.
T: 0282 565 04 13

1.0202 303 04 13

E: info@neo-environmental.co.uk





Prepared For:

Renewable Energy Systems (RES) Ltd



Prepared By:

Simon Newall BA (Hons) MA MPlan MRTPI



	Name	Date
Edited By:	Simon Newall	29/06/2021
Checked By:	Nicole Beckett	13/07/2021
	Name	Signature
Approved By	Paul Neary	Q. L 15 -





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INTRODUCTION

Background

- 1.1. Neo Environmental Ltd has been appointed by Renewable Energy Systems (RES) Ltd (the "Applicant") to produce an addendum to the Statement of Community Involvement (SCI) which provides a summary of post-application stakeholder and community engagement.
- 1.2. This SCI accompanies a planning application for a proposed 42MW solar farm and associated infrastructure (the "Proposed Development") on lands circa 1.2km southwest of Pyworthy, Devon (the "Application Site").
- 1.3. Please refer to Figure 4 of Volume 2: Planning Application Drawings for the layout of the Proposed Development.

Development Description

- 1.4. The Proposed Development will consist of the construction of bi-facial solar photovoltaic ("PV") panels mounted on metal frames, new access tracks, underground cabling, perimeter fencing with CCTV cameras and access gates, a temporary construction compound, substation and all ancillary grid infrastructure and associated works.
- 1.5. The Proposed Development will result in the production of clean energy from a renewable energy resource (daylight) and will also involve additional landscaping including hedgerow planting and improved biodiversity management.

Site Description

- 1.6. The Application Site is located on lands circa 1.2km southwest of the village of Pyworthy and c. 1.8km southeast of Bridgerule in Torridge, Devon; the approximate centre point of which is Grid Reference E229936, N101914. Comprising 28 agricultural fields, the Application Site measures 66.33 hectares (ha) in total. See Figure 1 of Volume 2: Planning Application Drawings for details.
- 1.7. Land within the Application Site itself is gently undulating, ranging between 95 125m AOD and consists of fields typically of medium scale and generally well enclosed by a mixture of dense treelines, hedgerows and woodland shelter belt, limiting visibility for local settlements and receptors (See Figure 3 of Volume 2: Planning Application Drawings for field numbers).
- 1.8. The Application Site is in an area with existing electricity infrastructure, with a solar farm present c. 0.3km southeast and another c. 1.2km to the southwest. Additionally, WPDs electrical Pyworthy Substation, where the Proposed Development is planned to connect, is located c. 75m from the northern parcel's eastern boundary, adjacent to Field 16.





- 1.9. The local area is generally agricultural in nature, punctuated by individual properties and farmsteads; the nearest residential areas are Hopworthy and Yeomadon, located 0.7km northeast and southeast respectively.
- 1.10. There are no recreational or promoted routes within the Application Site and therefore the Proposed Development will not directly impact upon any existing Public Rights of Way (PRoW), footways, cycleways or bridleways. Three PRoWs are located to the east of the Proposed Development, two of which are linked (Footpaths 1 and 3). Footpath 3 is located southeast of the Application Site boundary and runs in a southwest-northeast direction through Crinacott Solar Farm.
- 1.11. While there are a number of drains and water courses throughout the Application Site, it is mostly contained within Flood Zone 1, an area described as having a "Low probability" of flooding. The exception to this is a small part of the Application Site within Flood Zone 2 and 3, towards the eastern boundary of Field 16. These areas have been avoided within the Proposed Development footprint.
- 1.12. The Application Site will be accessed from four existing entrance points on the unnamed minor road which splits the site into northern and southern parcels. From the western boundary of the site, the road runs in a southwestern direction for c. 0.5km before turning in a general east-northeast direction through the eastern section of the Application Site.





POST-SUBMISSION CONSULTATION

- 1.13. This SCI Addendum sets out RES' approach to post-submission consultation with the local community and key stakeholders.
- 1.14. The Applicant is committed to maintaining an open dialogue with the local community. Anyone wishing to contact the Applicant were able to directly, with contact details of the project manager and community relations manager freely available on the project website.
- 1.15. In addition, following discussions with a councillor for Milton and Tamarside Ward, an online Public Information Day was held on 13 May 2021. Due to Covid-19 restrictions it was not possible to hold a physical event, however, the Applicant offered an online alternative as an effective and meaningful opportunity for interaction, and an approach successfully used on other developments. The information day was hosted on the project website at http://www.derrilwater-solarfarm.co.uk/public-information-day/ and, with regard to some broadband connectivity issues in the area, hard copies of all information day materials were available on request. The local community were also offered appointments by video or telephone (for those with poor broadband connectivity) with representatives from the Applicant, if they wished to ask specific questions about the proposal. The half hour appointments offered allowed for a longer period of discussion, than that which could have been provided at a physical event.
- 1.16. In order to publicise the event, a range of communication methods were used to provide further information and ensure that the local community had the opportunity to provide their feedback. These methods included:
 - A letter to Parish Councils and Councillors notifying them of the Public Information Day;
 - Circulating a newsletter to the local community;
 - Publication of an advertisement in the Pyworthy Post; and
 - Updates to the project website to provide details of the Public Information Day.
- 1.17. All feedback received throughout the post-application engagement and during the online public exhibition is summarised below along with the Applicant's responses.

Purpose of this Addendum

1.18. This addendum has been prepared by Neo Environmental Ltd on behalf of the Applicant to provide an update to the previously submitted Statement of Community Involvement and a comprehensive record of the post-submission public consultation undertaken on the Proposed Development, which builds upon the pre-application public consultation process detailed within the original SCI.





1.19. Consistent with advice in the LPA's Statement of Community Involvement, this document forms a consultation supporting statement that summarises the ongoing consultation activities undertaken by the Applicant, a summary of discussions undertaken, and issues raised, and how the Applicant has had regard to these comments.





METHODS OF CONSULTATION

Post-submission Publicity

- 1.20. Following the submission and subsequent validation of the application on 11th March 2021, the project website (www.derrilwater-solarfarm.co.uk) was updated with copies of all documents submitted as part of the planning application. The project website has been continually updated with new information throughout the planning process (See **Appendix A**).
- 1.21. The Applicant also wrote to key stakeholders on 11th March 2021 in order to confirm the submission of a planning application and to provide a link to project website, including details of how to register comments via the Council's website (See **Appendix B**).

Public Information Day

- 1.22. A key priority of the post-submission public consultation was to actively engage with residents close to the site and other key stakeholders located within the wider area.
- 1.23. An online Public Information Day was therefore held on the 13th May 2021 to provide local residents and other interested parties the opportunity to ask questions and learn more about the project. Individual telephone and video call appointments were offered between 10am 2 pm and 4pm 8pm as part of the event, which could be booked in advance by calling or emailing the Applicant direct.
- 1.24. In addition, further information on the solar scheme and key concerns were published on the project website at http://www.derrilwater-solarfarm.co.uk/public-information-day/. See Appendix C.
- 1.25. In order to publicise the event, letters were sent by email to both Pyworthy and Bridgerule Parish Councils (See **Appendix D**), and local Councillors on the 21st April 2021, notifying them of the Public Information Day. This was supplemented with a newsletter circulated to the local community on the 5th May 2021 (See **Appendix E**), and an advertisement in the Pyworthy Post on the 1st May (See **Appendix F**) in order to ensure that even those that are "hard to reach" were informed of the event and had an opportunity to participate.
- 1.26. For completeness, an introductory letter was also sent, on 11th May, to the newly-elected Devon County Councillor following elections on 6th May (See **Appendix G**).
- 1.27. The Applicant made themselves available on the 13th May 2021 to meet via telephone and online video conferencing (due to the COVID-19 pandemic) as part of their Public Information Day. Four local residents and members of the public booked appointments between 10:00-10:30, 11:00-11:30, 14:00-14:30 and 19:00-19:30, respectively.





- 1.28. The first meeting at 10:00 was with a resident of Derriton, who had already submitted an objection to the proposed development on business, environmental, local need, residential amenity, traffic and highways, and visual amenity grounds. The meeting was conducted via Microsoft Teams and attended by representatives of RES and Neo Environmental.
- 1.29. The second meeting at 11:00 was with a local resident, who had already submitted an objection to the proposed development on character, agricultural land classification, impact on businesses, ecology and safety grounds. The meeting was conducted via Skype and attended by representatives of RES and Neo Environmental.
- 1.30. The third meeting at 14:00 was with a local resident, who had already submitted an objection to the proposed development on scale and cumulative impact grounds. The meeting was conducted via Skype and attended by representatives of RES and Neo Environmental.
- 1.31. The fourth and final meeting at 19:00 was with a local resident, who had already submitted an objection to the proposed development on cumulative impact, agricultural land classification, ecological and performance-related grounds. The meeting was conducted via Skype and attended by representatives of RES and Neo Environmental.
- 1.32. How the points raised during the Public Information Day have been addressed by the Applicant are detailed in the "key concerns" section below.
- 1.33. Alongside meetings and calls with local residents and members of the public, an additional meeting took place with Councillor Kit Hepple, who is the Ward Councillor for Milton and Tamarside and had previously made a request on the 22nd March 2021 for the application be called-in to Planning Committee. The meeting was conducted via Microsoft Teams and attended by representatives of RES and Neo Environmental.
- 1.34. The discussion focussed on EIA screening opinion, the submitted request for screening report and the screening process itself. Neo Environmental's experience and qualifications relevant to preparing the planning application were also discussed.
- 1.35. More specifically, Councillor Hepple asked whether the proposed development had given sufficient regard to point (d) of Policy PYW: Pyworthy Spatial Strategy of the North Devon and Torridge Local Plan 2011-2031, which relates to retaining the character of the village and protection of the local and natural environment.
- 1.36. How the points raised above have been addressed by the Applicant are detailed in the "key concerns" section below.

Ongoing Consultation – Local Residents

1.37. In addition to the activities outlined above, since submission of the planning application, the Applicant has been receiving and responding to enquiries and comments from the local community, via telephone, email and post.





- 1.38. Twenty enquiries have been received in the period following submission of the planning application, from thirteen members of the public. Of these, three enquiries were requesting a hard copy of the planning application, which were provided by the Applicant. A number of enquiries sought clarity of pre-application consultation carried out by the Applicant and requests for face to face to meetings.
- 1.39. In all correspondence from the Applicant, an invitation to arrange a video or telephone call, to discuss the proposal was made. No such calls have been held with members of the public, outside of calls held on the Public Information Day.
- 1.40. An email in support of the proposed solar farm was received from a member of the public, who wished to remain anonymous. The comments below were submitted on the basis that the sender's name was not published on the Torridge District Council website or any other sites or correspondence.

To Whom it may concern,

I am in support of the solar project at Derril Water (1/0249/2021/FULM) as I believe renewable energy is required to fulfil the carbon free obligations that The Government have committed to on our behalf.

I would rather that it was more fragmented over a larger area but realise that the practicalities of connection, security, cost etc. come in to play. The land is marginal for farming and reasonably secluded, and having solar panels will still allow the land to be grazed by sheep.

- 1.41. A summary of the feedback received from members of the public, and the Applicant's response is included in the following sections.
- 1.42. The Applicant will continue to respond to any queries received in relation to the project from the local community, stakeholders and statutory consultees throughout the determination process.

Ongoing Consultation - Parish Councils

- 1.43. The Applicant wrote a letter to Pyworthy Parish Council and Bridgerule Parish Council on the 11th March 2021 in order to confirm the submission of a planning application and to provide a link to the project website, including details of how to register comments via the Council's website (See **Appendix B**).
- 1.44. On 21st April 2021 both parish councils were notified of the public information day to be held on 13th May 2021. No response was received from Bridgerule Parish Council. Pyworthy Parish Council were unavailable for an appointment on the public information day and a separate





- virtual meeting was held with members of the parish council, including the parish chair, on the evening of 19th May 2021.
- 1.45. Pyworthy Parish Council made a representation to the LPA objecting to the application, which was received on the 17th May 2021. The key concerns raised within the representation were discussed with the Parish Council during the meeting with the Applicant on 19th May 2021.
- 1.46. On 26th May 2021 an email was sent by the Applicant to the chair of Pyworthy Parish Council, summarising matters discussed at the meeting on 19th May 2021, and also containing further information on the proposal. (See **Appendix H**).

Ongoing Consultation – Other Stakeholders

- 1.47. The Applicant wrote a letter to Ward and District councillors on the 11th March 2021 in order to confirm the submission of a planning application and to provide a link to project website, including details of how to register comments via the Council's website (See **Appendix B**).
- 1.48. A telephone call was held with Cllr Hepple, of Torridge District Council on 12 May, when he enquired whether the planning application was expected to be heard by planning committee. Cllr Hepple also enquired if RES would join a public meeting to discuss the proposal with the local community. It was agreed that RES would investigate options for the public meeting, and revert to Cllr Hepple in due course.
- 1.49. Subsequent calls were held with Cllr Hepple on 22nd March and 12th April regarding the public information day. Along with other stakeholders, Cllr Hepple received a copy of the information advertisement on 21 April.
- 1.50. Two further emails have been exchanged with Cllr Hepple on 17 May and 1 June. A summary and the Applicant's responses are summarised in the following sections.





FEEDBACK AND KEY CONCERNS AND APPLICANT'S RESPONSE

1.51. The table below summarises the feedback and key concerns that have been raised during post-application engagement with the local community and stakeholders. The Applicant's response to each is included in the following table.

Table 1: Key topics arising and Applicant responses.

Key concern	Applicant response
	Visibility of the Proposed Development will be limited to localised receptors due to the sites relatively flat lands, surrounding mature field boundaries and low heights of the proposed infrastructure (c. 2.7m).
	The Applicant has reviewed comments relating to visual impact and Neo Environmental Ltd have prepared a comprehensive landscaping plan including detailed screening (planting) proposals.
Landscape and visual impacts, size, scale and nature of the project	The proposed development has been through a number of design changes in response to local feedback and site survey work, in order to minimise and mitigate any impacts on the local area. Such changes include the removal of specific areas in order to reduce visual impact on properties immediately adjacent to the site and to the row of properties at Furze, and to minimise the cumulative impact with the neighbouring solar farm. As a result of these changes, the site area has been reduced from 123ha at pre-application stage to 66ha as part of the current planning submission. Perimeter fencing will consist of deer fencing with wooden posts at 3m centres, 2.4m high and with a 0.1m gap at the bottom. Although this type of fencing has been specified in order to be appropriate to a rural location, the majority will be at least partly screened from view by the proposed mitigation planting.
	Similarly, the proposed CCTV cameras will be mounted on wooden poles. In order to maintain privacy, the cameras will be fixed (i.e. non-rotating) inward facing focussed on the perimeter fence.
	In order to address the current climate emergency, the Government has set an ambitious target of net zero by 2050. New forecasting from the Department for Business, Energy & Industrial Strategy (BEIS) places solar as cheapest source of new power generation for the coming years, which means that large scale solar is an important part of the energy mix required to meet these net-zero ambitions.
	Multiple independent analyses, including those undertaken by the Committee on Climate Change have concluded that around 40GW of solar will be needed by 2030 to stay on track with net zero ambitions. In June 2021, Solar Energy UK, published a analysis estimating that, residential and commercial development is expected to account for nearly 37% (15GW) of the total 2030 solar PV deployment with the





remaining 63% (25GW) coming from large scale ground mounted solar farms¹.

In order to drive the cost efficiencies needed to keep the cost of electricity low for the consumer in a subsidy-free era, economies of scale are required. Thus, there is currently a general trend towards larger solar developments. The largest consented solar project in UK is now 350MW, with the majority of projects in the planning system currently around 40-50MW. In Devon in particular, this includes consent recently being granted for a 50MW scheme near Barnstaple.

Large scale solar is part of the energy mix required to meet net zero ambitions and when identifying viable sites many factors need to be considered - good solar resource, proximity to statutory environmental, archaeological and landscape designations, grid capacity and proximity to grid infrastructure for example. The solar potential in Devon will continue to be explored by the Applicant and other developers as many of these factors are favourable to the development of new solar. Although the Applicant can never explicitly rule out any extension or new site locally, at the current time our focus is on the Derril Water scheme as it is presented in the current application. Any potential new scheme(s) would require a separate planning application which the Applicant would consult with the local community about at the appropriate time. The Applicant has engaged with several landowners in the site selection process before identifying the final site.

A number of concerns have been raised in relation to the potential impact of the proposed development upon local biodiversity.

In relation to concerns regarding the timing of the ecological surveys, it should be noted that an extended phase 1 habitat survey does not aim to produce a full botanical or faunal species list or provide a full protected species survey but enables competent ecologists to ascertain an understanding of the ecology of the site. The survey was performed outside the optimal season for botanical surveys (which is April to September). However, given the habitats present, it is not considered that this places a significant constraint on the interpretation of the Application Site's habitat interest.

Appropriate mitigation measures (including pre-commencement surveys and ecological supervision) have been specified for works affecting protected species at sensitive times of year. These include measures for nesting birds and amphibians/reptiles, more information can be found in the Ecological Impact Assessment (EcIA) and Outline Construction and Environmental Management Plan (OCEMP), submitted as part of the application.

The site is currently arable land which is of low ecological value. With the introduction of a solar farm, the land would be converted from arable to

¹ https://solarenergyuk.org/resource/lighting-the-way-making-net-zero-a-reality-with-solar-energy/



Ecological impacts



pasture, with light grazing proposed (i.e. the site will be dual use; production of renewable energy and agricultural activities). Grazed pastures provide nesting and feeding habitat for various species of birds. In addition to this, the land will no longer be sprayed with artificial pesticides and fertilisers, improving the quality of the land for local pollinators. With the implementation of a Biodiversity Management Plan (BMP) and a Landscape and Ecology Management Plan (LEMP), there will be a net positive effect for local wildlife. These plans include new hedgerow planting, native species planting and the use of wildflower and species-rich grassland seed mixes, in addition to introducing hibernacula and beehives.

Design measures have also been introduced to protect local wildlife from the Proposed Development, including a 5m buffer from hedgerows and drains and a 10m buffer from the watercourse and woodland. Despite some concerns over the movement of mammals being restricted, a 10cm gap has been designed into the bottom of the perimeter fencing to allow mammals to pass through the Application Site.

As stated in the Ecological Impact Assessment report submitting alongside the application, the removal of any sections of hedgerow should ideally be undertaken outside of the relevant hibernation and activity seasons for key species. In the event that hedgerow removal does need to take place during these periods, any dismantling/removal works will be overseen by a suitably qualified and experienced Ecological Clerk of Works.

Concerns were raised over the potential for the solar panels to cause issues for owls. Conversely however, they actually have the potential to be of great benefit to owl species (particularly Barn Owls), as the array frameworks are typically at a height from which they can perch-hunt.

The design has also been amended to avoid the Culm Grassland Priority Habitat in Field 25. A small section of fence line passed through this habitat and no other infrastructure; however, this habitat has now been avoided completely, reducing the potential for any adverse impacts. The infrastructure drawings, Ecological Assessment, Biodiversity Management Plan and Net-Gain Assessment have also been updated to reflect this change.

It is not proposed that any mature trees within the site boundary will be removed as part of the proposed development. Similarly, the majority of hedgerows will be retained as part of the proposals. Where the removal of hedgerows is required, this loss will be offset by the enhancement of existing hedgerows and additional tree planting, as set out within the LEMP submitted in support of the application. As set out in the submitted Net Gain Assessment, the proposed development is expected to lead to a significant biodiversity net gain.

Furthermore, there is an ever-growing body of evidence that indicates that solar farms can support wildlife habitats and contribute to achieving





national biodiversity targets, and Solar Energy UK (of which the Applicant are members) have established a working group exploring the natural capital of solar farms, developing best practice guidance and reporting process. The submitted LEMP and BMP set out how the measures proposed will ensure that the project delivers a net biodiversity gain in the long term.

A number of concerns have been raised regarding potential highways impacts and how traffic will be managed during the construction phase of the development, with specific regard to the route to site, the provision of passing places and the volume of deliveries.

The Applicant is continuing to engage with Highways Authority on the comments raised in their response to the planning application, which includes some of the points raised by members of the local community and wider general public, specifically the proposed route to site.

In order to ensure that traffic management is adequately addressed if consent is granted for the proposed development, it is expected that there will be a condition requiring full details of the construction traffic route and the Construction Traffic Management Plan (CTMP) to be submitted to and agreed in writing by the LPA, prior to the commencement of any construction works. This will also include details of mitigation measures proposed in order to mitigate any identified highways impacts.

Highways impacts and traffic management

Regarding concerns over the traffic survey undertaken during lockdown: the purpose of the Automatic Traffic Count (ATC) survey that took place on the 23rd January 2021 and left in place for one week was to collect real time data to determine the speed of road users rather than the number. Furthermore, the reduction in the number of road users during this period is likely to have increased vehicle speeds, potentially increasing the dimensions of visibility splays for each proposed access point.

Increased volumes of traffic will indeed be generated by the Proposed Development during the construction period however, the overall volumes of traffic generated by the Proposed Development during the construction period are considered to be quite low. During the anticipated six-month construction period, a total of 783 HGV deliveries will be made to the Application Site. During the peak construction period there will be an approximate maximum of 20 daily HGV deliveries and no abnormal loads. This would apply only in the peak construction period and not throughout the entire construction phase. The assessment considered deliveries of all components to site (as set out in Table 5-2 of the CTMP this includes aggregate for construction and considered journeys in both directions).

The operational phase of the solar farm is anticipated to have negligible trip generation potential with approximately 10-15 Light Goods Vehicles (LGVs) expected every year for scheduled maintenance checks, with





additional visits required to attend to remedial issues when necessary. This should be considered in the context of traffic movements associated with the existing dairy farm, including a milk pick up every other day and a feed delivery every week, which equates to approximately 200 vehicle movements a year that would stop following the development of the solar farm.

The Applicant will conduct a pre- and post-construction condition survey of the unnamed local road that the Application Site is accessed from, from the most western access point to the existing substation entrance point (approximately 1.1km), with the Applicant liable to repair any damage to the road attributed to the construction of the Proposed Development.

Based on feedback received, the proposed route through Holsworthy has been reviewed and a potential alternative route (along Underlane) discussed with the Highways Authority. The Highways Authority are agreeable to the alternative route, which is shown in the updated Figure 5.1 and if the project is consented, the CTMP will be updated prior to construction to take account of this.

By enabling further diversification, the solar farm will secure the future of two farms in the area, providing a secure income while allowing continued agricultural use. It will support the retirement plan for one farm, enabling a move to a less labour intensive, more environmentally friending farming practises, and the continuation of an existing holiday let business for the other.

The proposed site consists of a mixture of Grade 3a, 3b and 4 land with only 26.4 hectares (39.8%) being Grade 3a; this means that 60.2% is not considered Best and Most Versatile (BMV). In addition, it should be noted that just because there is an area of Grade 3a land within the site, that does not necessarily mean that it can be farmed as such. Individual site factors (such as topography or variances in ALC Grades), coupled with interactive limitations (principally wetness and/or droughtiness), all have a significant impact upon agricultural machinery use and crop production. This effectively means that in the majority of cases, the agricultural productivity of a parcel of land is restricted to the lowest grade of land present within it.

Loss of agricultural land

In this case, the 3a land comprises loamy soils over sandstone with imperfect drainage (Soil Wetness Class III). This combination means this land has wetness limitations, which in turn restrict machinery access in winter and early spring.

Part of the land in this subgrade is equally limited by moderately shallow depth to hard sandstone bedrock (less than 45 cm), which restricts rooting depth and the growth of arable crops.

The overall proposed footprint constitutes a relatively small percentage of the total area of the Application Site 3.7% or 2.4ha.





	In terms of food security, solar in general is expected to have negligible impact with just 0.06% of land in UK used for solar, compared with 28% and 29% for arable and livestock respectively ² .	
Decommissioning	A condition requiring a decommissioning statement to be submitted to and agreed in writing by the LPA prior to the commencement of development would normally be attached to any planning permission granted.	
	This would set out provisions for the future decommissioning of the solar farm and subsequent restoration of the site at the end of its operational life. The solar panels procured would also be subject to the WEEE directive, which sets out a legal framework for their safe collection and recycling at the end of their operational life.	
Consultation	Whilst the lifting of some Covid-19 restrictions is welcomed, RES' priority remains keeping our communities and staff safe by proceeding with caution and minimising non-essential travel. Our policy, at this time, is to continue to use video or telephone appointments, such as those that we offered for our Public Information Day or indeed at any time, as an effective form of interaction. This method of communication typically provides greater one on one time than that, that can be provided at a physical event.	
	The Applicant remains committed to maintaining open communication and would be very happy to arrange telephone/video calls with anyone in the community who wishes to discuss the proposals.	
	The Applicant is committed to ensuring that modern slavery, a term encapsulating human trafficking, forced labour and other forms of human exploitation, does not exist in our supply chain.	
Modern Slavery	RES, alongside many members of the UK solar industry, condemn and oppose any abuse of human rights, including forced labour, anywhere in the global supply chain. We support applying the highest possible levels of transparency and sustainability throughout the value chain, and commit to the development of an industry-led traceability protocol to help to ensure our supply chain is free of human rights abuses. This pledge forms part of Solar Energy UK's supply chain sustainability workstream. The pledge and its signatories can be found here. If/when constructing the project we would seek to maximise inward investment through the use of local contractors, however, given the specialist nature of some of the equipment, it is inevitable that there will be a need to source equipment from a wider supply chain which may be within the UK, Europe or worldwide. We would expect anyone in the supply chain to adhere to UK law on aspects related to quality, safety and ethical standards.	

² https://solarenergyuk.org/resource/natural-capital/





Impacts relating to security infrastructure	The proposed development includes the installation of deer fencing around the site perimeter, with security fencing only proposed around the substation compound. The deer fencing will also include mammal gates to ensure the free movement of wildlife. The deer fencing figure had been missing from the original application and was submitted to Torridge DC on the 7 th May 2021. The project website was also updated with the new figure and a hard copy sent to those members of the public who had requested a hard copy of the planning application. In terms of concerns relating to the CCTV cameras, the mounting posts are required to be 3.5m high to ensure they have adequate visibility of the site. It should be noted that the cameras would face inward to the site and be fixed (i.e. non-pivoting). Full details of these and any other security measures would be confirmed and agreed with the Designing Out Crime Officer prior to commencement, however it is intended that lighting and alarms would only be specified for the substation buildings, with no further lighting is proposed apart from security lighting at the substation compound.
Impacts on economy, tourism	Tourists travelling through the area are considered to be no more or less sensitive than local residents. Impact on the local road and footpath network has been assessed as part of the application. The solar farm could deliver direct benefit to the area - generating jobs during construction and decommissioning. Inward investment can be significant as a range of services will be required including haulage, onsite welfare facilities, refuse and recycling facilities, transport and local accommodation for construction workers. In addition, the solar farm would be paying business rates of around £162,000 a year, money which goes direct to Torridge District Council to support local services. RES also has a large and growing O&M business, which is continuously recruiting for skilled staff to oversee the operations of solar farms. In many cases, it is essential that these roles are based local to the sites.
EIA requirement	The EIA Regulations set out thresholds for Schedule 1 developments for which Environmental Impact Assessment (EIA) is mandatory and Schedule 2 development for which an EIA may need to be undertaken. The Proposed Development does not fall within any of the developments listed in Schedule 1, but falls within Schedule 2; Section 3(a), i.e. 'installations for the production of electricity, steam and hot water (unless included in Schedule 1)', where the site exceeds 0.5 ha in area. The need for an EIA for development listed in Schedule 2 of the EIA Regulations is dependent on whether the development is "likely to have significant effects on the environment by virtue of factors such as its nature, size or location". Schedule 3 of the EIA Regulations outlines the selection criteria for screening Schedule 2 developments which include: the characteristics of the development; the environmental sensitivity of the geographic





	location; and the types and characteristics of the potential impacts (e.g. its magnitude, nature, probability and duration).
	A Request for a Screening Opinion under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 was submitted to Torridge District Council for the proposed development on the 14 th December 2020. On the 23 rd December 2020 a letter was received from the LPA stating that there was no requirement for an EIA, on the basis that the proposed development would not result in significant environmental effects at any stage.
	Nevertheless, comprehensive supporting documentation has been submitted in support of the planning application, which is consistent with the level of detail that would be expected if the proposals were considered to require EIA.
Flood Risk	Based on Devon County Council's comments, the drainage design has been amended to accommodate swales and infiltration trenches within the entire site, regardless of gradients (see Figure 4.4). This will ensure that water and potential erosion across the site are managed and controlled.
	The proposed filter drains / infiltration trenches will have an overall combined length of approximately 1,948m, with a base width of 0.5m, a 0.5m design depth and a 0.15m freeboard. They will be filled with crushed rock with a void ratio of 20%. These will provide a total storage volume of approximately 97.4m ³ .
	The proposed swales will be of an overall length of approximately 291m, with a base width of 500mm, a 500mm design depth, 150mm freeboard and a maximum side slope of 1 in 3. These will provide a total storage volume of approximately 291m ³ .
	In total, proposed drainage strategy will provide a storage volume of approximately 388.4m ³ . This is greater than the volume of additional runoff generated as a result of the impermeable buildings (109.0m ³). It is therefore considered that this not only adequately mitigates the increase in flow rates as a result of the minor increase in impermeable area, but provides improvement.
Noise	The Applicant has engaged further with the Environmental Protection Officer (EPO) to clarify property ownership and have agreed to a draft condition proposed by the EPO to ensure that the 35dB noise limit will be met at all properties.





CONCLUSION

- 1.52. This Statement of Community Involvement (SCI) Addendum has provided an overview of the post-submission engagement and consultation activities that have been, and continue to be, undertaken by the Applicant on the Proposed Development.
- 1.53. The Applicant has undertaken a comprehensive programme of post-submission engagement in order to proactively inform and engage with the local community and key stakeholders, including the Parish Council, District and County Councillor and individual residents.
- 1.54. This process has allowed the Applicant to identify and respond to local issues and potential concerns. Of the issues raised during the consultation, issues relating to visual impact, local ecology and biodiversity, and traffic and transport were of particular importance to the community. Comments on these topics have been and will continue to be taken into consideration by the Applicant.
- 1.55. The Applicant is committed to continuing the open dialogue they have established with the local community during public consultation and as the application process continues, as outlined within this SCI addendum.





APPENDICES

Appendix A – Updated Derril Water Website – Planning Application Submission

Appendix B – Example Stakeholder Engagement Letter

Appendix C – Updated Derril Water Website – Public Information Day

Appendix D – Stakeholder Letter Notifying of Public Information Day

Appendix E – Newsletter

Appendix F - Pyworthy Post Advertisement

Appendix G – Letter to County Councillor

Appendix G – Pyworthy Parish Council Meeting Minutes

Appendix H – Response to Pyworthy Parish Council

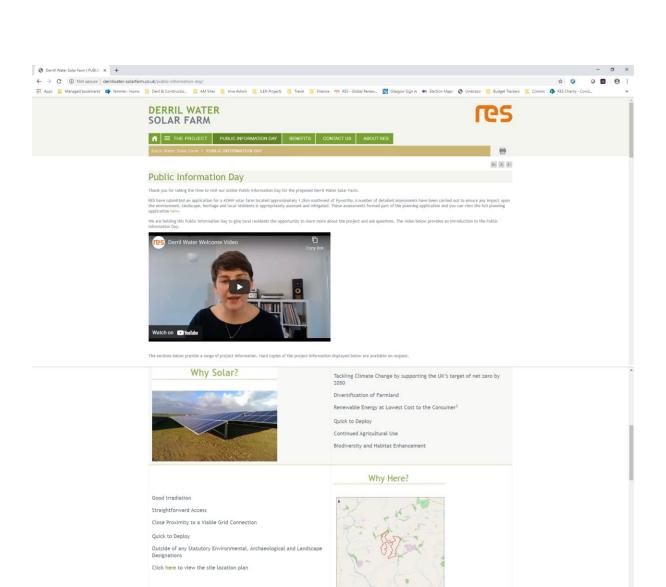






Appendix A





What Would the Solar Farm Look Like?



We have sensitively designed the solar farm to minimise the visual impact

Click here to view a range of visualisations showing what the solar farm would look like immediately following construction and what the solar farm would look like, in year 5, with the screening measures we propose as part of the planning application



Land Use

Over 55% of the agricultural quality of the land has been graded subgrade 3b or below

The project has been designed in such a way that less than 4% of the land is physically occupied by the arrays and infrastructure, allowing agriculture in the form of sheep grazing to continue on over 96% of the site during operation

Click here for more information



Construction



Short Construction Period - Typically 6 Months

Pre and post-construction road condition survey will be conducted with RES liable to repair any damage to the road attributed to the

Dedicated community liaison officer to engage with local residents

Hours of Operation and traffic movements limited to 07:00-19:00 on Monday to Friday and 08:00-16:00 on Saturdays, and scheduled to avoid morning and evening peak hours

Comprehensive pollution prevention measures to protect soils and watercourses and Ecological Clerk of Works appointed full-time during construction phase, to prevent habitat disturbance or destruction

Operating plant noise kept within the legal standards and Hours of Operation. Any noncomplying plant stopped and stood down until it can be rectified or removed

Ecological Benefits

We propose a number of biodiversity enhancement measures, including the planting of native trees and hedgerows to provide a plentiful source of food and shelter for a range of fauna

Please click here for more information



Environmental Benefits



Renewable energy at lowest cost to the consumer¹

Approximately 41,000MWh of clean, green electricity produced each year

Equivalent to the electricity usage of around 12,100² homes each year

Over 744,338t³ tonnes of carbon emissions saved during its operational lifetime³

Valuable contribution to the UK's renewable energy targets and helping tackle climate change $\,$

Economic Benefits



The main opportunities arise during the construction phase when suitably qualified local firms are invited to bid for different aspects of construction, such as haulage, on-site welfare facilities, refuse and recycling facilities, transport and local accommodation for construction workers

Please click here for more information



Ouestions?

ware holding telephone and video appointments between 10am - 2pm and apm - 8pm on Thursday 13th May, for people to ask questions about the proposal. We have been encouraging people to book these appointments in advance and so availability may be limited, however, please call us on 01872 226930 If you would like to book an appointment and we will do our best to find a time which suits you (this may mean arranging a call with you on a different date if necessary).

2 The 13,00 homes figure has been colculated by taking the predicted curval interfally generation of the site (based on 455 assessments Serril Vister has a predicted capacity factor of 11.8% and dylding this by the annual overage electricity figures from the Department of Business, Energy and industrial Strategy (80%) showing that the annual UK average dementic household consumption is 1,578 kHH (Dec 2005).

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Appendix B





Renewable Energy Systems Ltd

Beaufort Court, Egg Farm Lane, Kings Langley Hertfordshire, WD4 8LR, England, UK +44 (0)1923 299 200 | info@res-group.com

Mrs Cathy Withall 4 Stanhope Close Holsworthy Devon EX22 6HT

11 March 2021

Dear Mrs Withall,

RE: Derril Water Solar Farm Proposal, Pyworthy

I am writing to let you know that RES has submitted a planning application for the 42MW Derril Water Solar Farm, located approximately 1.2km southwest of Pyworthy village.

The planning application contains a number of detailed assessments each of which evaluate the proposal in relation to the environment, landscape and cultural heritage. Over the previous few weeks we have refined the design of the solar farm, based on the feedback received from the local community, which has helped us to develop a sensitively designed project which maximises the low carbon, low cost electricity the site would be capable of producing.

Alongside onshore wind, solar is now the cheapest form of new electricity generation, making its development not only beneficial for the environment but also for the bill payers. If consented, Derril Water Solar Farm will be capable of producing clean, green electricity for approximately 12,100 homes every year. The project will also make CO2 savings of over 18,600 tonnes per annum and will support our transition to net zero by 2050.

Due to Covid-19 restrictions, we have not placed any hard copies of the planning documents in public locations. However, electronic copies of the planning application and accompanying documents can be viewed or downloaded from the project website at http://www.derrilwater-solarfarm.co.uk/. Hard copies of some planning documents can be arranged on request.

Additionally, the planning application and associated documents are available to view on Torridge District Council's website - https://publicaccess.torridge.gov.uk/online-applications/. The planning reference number is 1/0249/2021/FULM. A statutory consultation period will be advertised and held by Torridge District Council to enable the public, as well as statutory consultees, to submit their comments on the proposal. These comments will then be assessed against the proposal and a determination made in due course.

If you have any questions or you would like further information, please don't hesitate to get in touch.

Yours sincerely,

Sarah Rocks

Development Project Manager

D +44 282 8440615 | M +44 797 9202995

E: sarah.rocks@res-group.com



Appendix C





Renewable Energy Systems Ltd

Beaufort Court, Egg Farm Lane, Kings Langley Hertfordshire, WD4 8LR, England, UK +44 (0)1923 299 200 | info@res-group.com

Mrs Cathy Withall 4 Stanhope Close Holsworthy Devon EX22 6HT

21 April 2021

Dear Mrs Withall,

RE: Derril Water Solar Farm Proposal, Pyworthy

I am writing to provide an update regarding the Derril Water Solar Farm Proposal.

On Thursday 13th May 2021 we will be holding a virtual Public Information Day to provide local residents with an opportunity to learn more about the project and ask questions. Project information including FAQs and visualisations will be hosted on the Derril Water project website at www.derrilwater-solarfarm.co.uk, with hard copies of all materials available upon request. In addition, we will be offering individual telephone or video call appointments, with the Derril Water project team, between 10am and 2pm and between 4pm and 8pm for anyone wishing to discuss the proposal further or ask specific questions.

We will be placing an advertisement, for the Public Information Day, in the next edition of the Pyworthy Post. We will also be distributing a newsletter, including information on the Public Information Day, to the wider community, in early May.

If the parish councillors would like to discuss the Derril Water proposal with the project team, we would be very happy to set up a telephone or video call at a convenient time.

If you have any queries or need further information please get in touch.

Yours sincerely,

Sarah Rocks

Development Project Manager

D +44 282 8440615 | M +44 797 9202995

E: sarah.rocks@res-group.com



Appendix D





Derril Water Solar Farm Proposal

RES has submitted a planning application for a 42MW solar farm located approximately 1.2km southwest of Pyworthy.

Tackling Climate Change by supporting the UK's target of net zero by 2050

Diversification of Farmland

Renewable Energy at Lowest Cost to the Consumer¹



Quick to Deploy

Continued Agricultural Use

Biodiversity and Habitat Enhancement

Why Here?

- The site has been chosen as it has good irradiation levels, can be easily accessed and is close to a grid connection point. In addition the site lies outside of any statutory environmental, archaeological and landscape designations.
- Views of the solar farm would be limited to a small number of receptors and such views will be further limited to only parts of the overall project.
- Mitigation measures including tree and hedgerow planting, infill planting and enhancement of existing hedgerows will help to further reduce views of the solar farm.
- The solar farm is expected to have minimal impact on ecology and we propose a number of biodiversity enhancement measures, including the planting of native trees and hedgerows to provide a plentiful source of food and shelter for a range of fauna.
 We will also develop species-rich grassland across the site, and install dormouse, bat and bird boxes, hedgehog houses, reptile hibernacula, invertebrate hotels and bee banks. These measures coupled with retaining and maintaining existing grassland and hedgerow will lead to a net gain for local wildlife,

- with a gain of over 29% in hedgerow units and over 90% in area habitat units.
- Over 55% of the agricultural quality of the land has been graded subgrade 3b or below and the project has been designed in such a way that less than 4% of the land is physically occupied by the arrays and infrastructure, allowing agriculture in the form of sheep grazing to continue on over 96% of the site during operation.
- If consented, the project could generate a range of direct benefits for the area both in terms of its construction and operation, by generating jobs for installation, maintenance, and its eventual decommissioning and remediation. The scheme represents a significant financial investment as a range of support services will be required including haulage, on-site welfare facilities, refuse and recycling facilities, transport and local accommodation for construction workers. In addition, we estimate some £162,000 will be payable in business rates, each year, which support vital local services.

What Would the Solar Farm Look Like?

We have sensitively designed the solar farm to minimise the visual impact. The visualisation below shows what the solar farm would look like, immediately following construction, from the minor road south of Monks Farm/New Park.



With the screening we have proposed as part of the application, the visualisation below shows what the solar farm would look like, in year 5, from the same location.



Visulations from a number of other viewpoints can be viewed on our website at www.derrilwater-solarfarm.co.uk.

Public Information Day

We are holding an online Public Information Day on Thursday 13th May, to give local residents the opportunity to learn more about the project and ask questions.

The Information Day will be hosted on the Derril Water project website at www.derrilwater-solarfarm.co.uk. Hard copies of all Public Information Day materials will be available.

RES will be offering individual telephone or video call appointments between 10am - 2pm & 4pm - 8pm, on the day, for anyone wishing to discuss the proposal further or ask specific questions. Appointments must be booked in advance with RES by emailing carey.green@res-group.com or by calling 01872 226 931.



Please note that comments submitted to RES at the Public Information Day are not representations to the determining authority (Torridge District Council). Representations to Torridge District Council can be made through their website at https://publicaccess.torridge.gov.uk/online-applications/ quoting planning reference number 1/0249/2021/FULM.

In line with current Government guidance, the Public Information Day is being held online due to the current covid-19 pandemic.



Appendix E





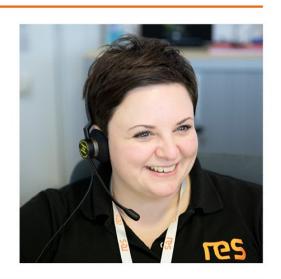
Derril Water Solar FarmPublic Information Day

RES has submitted a planning application for a 42MW solar farm located approximately 1.2km southwest of Pyworthy.

We are holding an online Public Information Day on Thursday 13th May, to give local residents the opportunity to learn more about the project and ask questions.

The Information Day will be hosted on the Derril Water project website at www.derrilwater-solarfarm.co.uk. Hard copies of all Public Information Day materials will be available.

RES will be offering individual telephone or video call appointments between 10am - 2pm and 4pm - 8pm, on the day, for anyone wishing to discuss the proposal further or ask specific questions. Appointments must be booked in advance with RES by emailing carey.green@res-group.com or by calling 01872 226 931.



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In line with current Government guidance, the Public Information Day is being held online due to the current covid-19 pandemic.



Appendix F





Renewable Energy Systems Ltd

Beaufort Court, Egg Farm Lane, Kings Langley Hertfordshire, WD4 8LR, England, UK +44 (0)1923 299 200 | info@res-group.com

Cllr K Hepple Flat 1 Molesworth Arms Holsworthy Devon EX22 6SU

21 April 2021

Dear Cllr Hepple,

RE: Derril Water Solar Farm Proposal, Pyworthy

I am writing to provide an update regarding the Derril Water Solar Farm Proposal.

On Thursday 13th May 2021 we will be holding a virtual Public Information Day to provide local residents with an opportunity to learn more about the project and ask questions. Project information including FAQs and visualisations will be hosted on the Derril Water project website at www.derrilwater-solarfarm.co.uk, with hard copies of all materials available upon request. In addition, we will be offering individual telephone or video call appointments, with the Derril Water project team, between 10am and 2pm and between 4pm and 8pm for anyone wishing to discuss the proposal further or ask specific questions.

We will be placing an advertisement, for the Public Information Day, in the next edition of the Pyworthy Post. We will also be distributing a newsletter, including information on the Public Information Day, to the wider community, in early May.

If you would like to discuss the Derril Water proposal further with the project team, we would be very happy to set up a telephone or video call at a convenient time.

If you have any queries or need further information please get in touch.

Yours sincerely,

Sarah Rocks

Development Project Manager

D +44 282 8440615 | M +44 797 9202995

E: sarah.rocks@res-group.com



Appendix G



Minutes of the Meeting of Pyworthy Parish Council – Thursday 22nd April 2021 via Zoom

Present: Cllrs. R. Skinner, J. Davey, A. Parrish, D. Glessing, N. Lock, I. Cleave and R. Moores.

Parish Clerk in attendance

Cllr. Kit Hepple and Cllr. Ken James (TDC)

18 members of the public.

1389. Welcome

Cllr. Skinner welcomed all to the meeting. A minutes silence in memory of HRH The Duke of Edinburgh was

1390. Apologies

None

1391. Minutes of the last meeting

Minutes of the last meeting on Thursday 11th March 2021 via Zoom were agreed and signed.

1392. Matters arising

Cllr. Lock asked if the matter of the dog bin had been addressed, as he had permission from the landowner to install, and Cllr. Skinner said this had been overlooked and would be addresses at the next meeting. Cllr. Lock also asked if there had been any progress on the vehicles parked outside The Old Forge. The Clerk confirmed that she had written to MP Geoffrey Cox, who was unable to assist, and also to the owner Mr Bone, who had not replied.

1393. Public open question time

Mike Godfrey, Adrian Oliver, Mark Marriott, Jan Spencer, Ken Watson, Jane Oliver, Maria Barlow, Vincent Sullivan, David Hillebrandt and Bill all spoke objecting to the application. TDC Cllr. Kit Hepple also spoke against the application.

1394. Planning application Derril Water Solar Farm - 1/0249/2021/FULM

Cllr. Parrish said that he had read through the application over the past weeks, in his opinion it was 900 pages of misleading information, and he objected strongly. He said that the amount of traffic, the fences and security cameras would all have a detrimental effect. He added that as the Council were CPRE members he didn't see the need to engage a planning consultant as they had access to this service as part of the membership. He said that TDC should hold their planning committee meeting in Pyworthy, if the application was not decided by the planning officer. His opinion was that Pyworthy stood as good a chance as any parish council of getting the application refused. Cllr. Skinner said that she had asked TDC to hold the planning meeting in Pyworthy, and delay this until the end of June when Covid restrictions would hopefully be lifted. Cllr. Parrish said that Cllr. Leather should be canvassed as chair of the planning committee.

Cllr. Lock said that he was totally against the application. He had major concerns for wildlife in the area, as the fencing would restrict movement of mammals and the panels would cause issues for owls. He had viewed the site that day, and the area that the panels would cover was unbelievable. The roads were not suitable for the volume of traffic. Cllr. Davey said that it was good to see the strength of feeling in the parish, and she totally objected to the plans. The site was massive, and would have a huge impact on the landscape.

Cllr. Moores said that the upgrade to the electric substation was something the Council was not aware of until recently, and meant that it could receive power from several sites this size. Cllr. Cleave said that Phase 2 of the plans could be bigger that they imagined. He added that 20,000 tonnes of stone would be needed just to create the roadways, and he could not support the application in any way. Cllr. Lock added that RES were part of the much bigger McAlpine group. He also said that there were plenty of industrial buildings locally to put solar panels on, including the cattle market which had none.

Cllr. Skinner said that RES had done their traffic survey at the end of January 2021, when due to lockdown there were no schools or non-essential businesses open, and traffic would have been particularly quiet. They had only carried out a Phase 1 habitat survey in October, and this should be done again now when there was more activity. They wanted to remove hedges between March and September, when farmers and contractors are not allowed to do so due to nesting birds and wildlife. The grading of the land in parts as moderate to good - the farm is in a less favoured area -as are all the farms in this area. Whilst it is not necessarily suitable for tilling corn - it is a very successful dairy farm. The fields being used for cattle grazing and also growing grass for the 2/3 cuts of silage, being fodder for the winter. The plan was for 783 HGV's and each journey was only counted one way, and didn't include contractors or staff vehicles. During the building phase they would operate from 7am to 7pm Monday to Friday, and 8am to 4pm on Saturdays, which equated to an HGV on average every 15-20 minutes. The route from Coles Mill, up Chapel St and turning left into Bodmin Street was challenging normally, not to mention the narrow traffic lights and small bridges at Derriton and Derril Water. They were also suggesting creating more passing places – would this require more hedges to be removed? She said that for all these and personal reasons she objected, if the solar application went ahead it would have a severe impact on the area.

Cllr. James said that agricultural tenancy of the property would remain. He said he would ask about holding the planning meeting in Pyworthy, and he had confidence in his planning officers. Cllr. Glessing said that this was a waste of a good farm, and Pyworthy already had its fair share of solar parks. Cllr. Skinner said that she had spoken to one of the landowners, and in his opinion RES were unlikely to attend any meeting in person, although they had proposed an online meeting for the 13th May. This was discussed, and it was agreed that the Council would attend the online meeting, whilst pushing for in person attendance when this was possible. Calls were made for the application to be delayed until later in the year, when Covid restrictions were lifted and open meetings could be held. Cllr. James (TDC) said that there was a statutory time frame in which applications had to be decided, but he would look into whether TDC had sufficient grounds to delay the decision. If the reasons were insufficient, RES would be able to bypass TDC and go straight to the planning inspectorate. The Clerk asked if the closing date on the application could be changed, as it was showing as closed on the TDC website which could put people off submitting their comments. Cllr. James said he would try, and also confirmed that all comments received in good time before the decision (at least 48 hours) would be considered.

Cllr. Lock proposed that the application be opposed, this was seconded by Cllr. Parrish and agreed unanimously. Cllr. Lock suggested a petition, and that Tamar Trading be contacted. The Clerk suggested that the CPRE be contacted for assistance in writing the objection in the first instance, and Councillors could all contribute salient points. She also suggested contacting neighbouring Councils and the local press, and would co-ordinate this with the Chair and Councillors.

1395. Date of next meeting

Thursday 27th May 2021 at 7.30pm in the Village Hall (dependant on Covid regulations at the time). The meeting was closed at 21.31.



Appendix H



Simon Newall

From: Sarah Rocks <sarah.rocks@res-group.com>

Sent: 26 May 2021 18:53 **To:** ros.skinner@hotmail.com

Cc: pyworthy@yahoo.co.uk; Laura.Davies@torridge.gov.uk; Carey Green

Subject: Derril Water Solar Project **Attachments:** Figure 15 - Deer Fencing.pdf

Dear Ms Skinner,

Thank you for taking the time to meet with us last week. We appreciate this further discussion which enables us to get a better understanding of some of your key concerns in relation to the project. Please find below some notes following the call, which cover some of the key areas discussed and provide some further clarification where relevant.

Traffic Management

We note your concerns regarding the route to site, passing places, volume of deliveries etc.

As discussed, we are continuing to engage with Highways Authority on the comments raised in their response to the planning application (which includes some of these points) and the proposed route to site.

It is expected that, if consented, there will a condition indicating that full details of the construction traffic route and the Construction Traffic Management Plan (CTMP) are to be agreed in advance of construction starting.

Regarding the traffic assessment we clarified the following:

- the ATC speed survey assesses the speed of road users (rather than the volume of traffic) and is used to calculate the dimensions required for visibility splay dimensions;
- the assessment considered deliveries of all components to site. As set out in Table 5-2 of the CTMP this includes aggregate for construction and considered journeys in both directions;
- the daily maximum of 20 deliveries/day that is indicated in the CTMP would only apply during the peak delivery period.

We have taken on board comments received during pre-application consultation in relation to the route to site and also concerns regarding traffic impacts and have proposed mitigation to address these as far as possible, including:

- Creation of CTMP;
- A delivery booking system will be used and will have limitations on working times/HGV scheduling;
- A Community liaison officer will be appointed in advance of and throughout the construction phase;
- Pre and post construction condition survey to be carried out of the unnamed local road with applicant liable for repair of any damage;
- Additional mitigation such as site security and signage, measures to control dust, etc.

Based on comments included in the public representations we are looking again at the proposed route through Holsworthy and welcome any additional comments on specific points of concern along the proposed access route.

Impact on ecology, timings of works, etc.

As discussed, we are not proposing to remove any mature trees within the site. The <u>Landscape and Ecology</u> <u>Management Plan (LEMP)</u> sets out where it is proposed to remove hedgerows, where these will be retained and enhanced and where new hedgerow and tree planting will be undertaken. As set out in the <u>Net Gain Assessment</u>, the proposed development is expected to lead to a significant biodiversity net gain.

There is a growing body of evidence that indicates that solar farms can support wildlife habitats and contribute to achieving national biodiversity targets. The LEMP and <u>Biodiversity Management Plan (BMP)</u> set out the measures proposed by RES to ensure that the Derril Water project delivers net biodiversity gain in the long term. Regarding the timing of the surveys, we advised that Phase 1 Habitat Surveys can be carried out year-round. Different wildlife

constraints exist at the site at different times of year. In light of this, appropriate mitigation measures (including precommencement surveys and ecological supervision) have been specified for works affecting protected species at sensitive times of year. These include measures for nesting birds and amphibians/reptiles, more information can be found in the Ecological Impact Assessment (EcIA) and OCEMP)) submitted as part of the application.

It is expected that, if consented, there will a condition indicating that full details of the LEMP, BMP and OCEMP are to be agreed in advance of construction starting. It would also ensure mitigation measures proposed are managed and monitored throughout the solar farm's operational life.

Security

As discussed, we propose to install deer fencing around the site perimeter. Security fencing is proposed around the substation compound only. The deer fencing will include mammal gates to ensure the free movement of wildlife. A copy of the deer fence figure, which was missing from the original planning submission, is now attached for information.

The CCTV posts are required to be 3.5m high to ensure they have adequate visibility of the site. The cameras face inward to the site. Full details of any security would be confirmed pre-construction (and agreed with the Designing Out Crime Officer) but we would expect lighting and alarms for the substation buildings only. No lighting is proposed apart from security lighting at the substation compound.

Decommissioning

If consented, we would generally expect a condition to state that prior to commencement of works a decommissioning statement will be agreed with the local authority. This would set out provision for decommissioning of the solar farm and restoration of the site at the end of the project's operational life. The solar panels we procure are subject to a WEEE directive which sets out a legal framework for their safe collection and recycling at the end of their operational life.

Size of project, design, lot of solar already in the area

As you know, in order to help address the climate emergency, the government have set an ambitious target of net zero by 2050. New forecasting from BEIS places solar as cheapest source of new power generation for the coming years, which means that large scale solar is an important part of the energy mix required to meet these net zero ambitions.

Multiple independent analyses, including those undertaken by the Committee on Climate Change have concluded that around 40GW of solar will be needed by 2030 to stay on track with net zero ambitions. Analysis from Solar Energy UK, in a report expected in June 2021, estimates that 24GW of this would be from ground mounted solar farms, 10GW from residential and 6GW from commercial and industrial development.

Economies of scale are required, in this subsidy-free era, to drive the cost efficiencies needed to keep the cost of electricity low for the consumer. There is a general trend towards larger solar developments. The largest consented solar project in UK is now 350MW, with the majority of projects in the planning system currently around 40-50MW. In Devon, as you may be aware, consent was recently granted for a 50MW scheme near Barnstaple.

The site has been through a number of design changes in response to local feedback and site survey work, in order to minimise and mitigate any impacts on the local area. These changes include removal of areas to reduce visual impact on properties immediately adjacent to the site, and to the row of properties at Furze and to minimise the cumulative impact with the neighbouring solar farm. As a result of these changes, the site area has been reduced from 123ha at pre-application stage to 66ha in the planning submission.

Community Benefit

In the subsidy-free era we've had to adapt our business model to prioritise clean electricity generation at lowest cost to the consumer. We still firmly believe, however, that our projects should deliver benefits to the local community. We welcome input from you on how best to maximise the impact of a community benefit and hear about priority schemes, projects and aims in the area, which we may be able to support. Examples of some

initiatives we have supported on other projects include a bursary and apprenticeship schemes and support of community assets.

RES Experience

RES is a British company and is the world's largest independent renewable energy company active in onshore and offshore wind, solar, energy storage, transmission and distribution. At the forefront of the industry for 39 years, RES has delivered more than 20GW of renewable energy projects across the globe. In the UK and Ireland we have developed and/or constructed 266MW of ground mounted solar projects.

Whilst Derril Water, if consented, would be our largest solar development to date in the UK, we have a proven track record of developing and constructing similar and larger sized renewable energy developments. These include the recently consented 105MW solar farm in County Galway, the recently consented 99.9MW Lakeside Energy Storage Project, the 46.9MW Evishagaran Wind Farm currently under construction and the 67.2MW Cairn Duhie Wind Farm which is in planning. We currently operate over 200MW of solar farms across the UK.

Additional comment/points discussed

We are continuing to engage with other statutory consultees to close out comments raised in their responses to the planning application.

Regarding the opportunity for in-person meetings, as explained, we, like everyone, welcome the further lifting of Covid restrictions. Our priority remains keeping the community and our staff safe by proceeding with caution, not taking unnecessary risks and minimising non-essential travel. Our policy, at this time, is to continue to use video or telephone appointments, such as that offered for our Public Information Day or indeed at any time, as an effective and safer form of interaction. This policy is kept under constant review by our management team.

We remain committed to maintaining open communication and would be very happy to arrange telephone/video calls with anyone in the community who wish to discuss the proposal.

Please feel free to contact us with any questions or if you would like another meeting to discuss anything further.

Best regards, Sarah

Sarah Rocks

Development Project Manager, UK & Ireland

D +442828440615 | M +447979202995 sarah.rocks@res-group.com | res-group.com





Committed to a future where everyone has access to affordable zero carbon energy

Renewable Energy Systems Limited, registered in England and Wales with Company Number 1589961 Registered Office: Beaufort Court, Egg Farm Lane, Kings Langley, Hertfordshire WD4 8LR



GLASGOW - HEAD OFFICE

Wright Business Centre, 1 Lonmay Road, Glasgow G33 4EL T: 0141 773 6262 www.neo-environmental.co.uk

N. IRELAND OFFICE	IRELAND OFFICE	RUGBY OFFICE	WARRINGTON OFFICE
83-85 Bridge Street	Johnstown Business Centre	Valiant Office Suites	Cinnamon House, Cinnamon Park
Ballymena, Co. Antrim	Johnstown House, Naas	Lumonics House, Valley Drive,	Crab Lane, Fearnhead
Northern Ireland	Co. Kildare	Swift Valley, Rugby,	Warrington
BT43 5EN	T: 00 353 (0)45 844250	Warwickshire, CV21 1TQ	Cheshire
T: 0282 565 04 13	E: info@neo-environmental.ie	T: 01788 297012	T: 01925 661 716