



Limekiln Wind Farm

Section 36C Variation Application

INFINERGY

harnessing the power of nature

Statement of Community Consultation

June 2021



Cover image for illustrative purpose only

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Executive Summary

Infinergy Limited ('Infinergy') has undertaken consultation for its proposed Limekiln Wind Farm Section 36C application (hereafter referred as the 'Revised Consented Development') in line with Scottish Government Guidance: Coronavirus (COVID-19): development planning consultation and engagement advice - May 2020 by engaging with stakeholders virtually to present plans and gather feedback.

Consultation activity so far has included:

- distribution of newsletters to local residents;
- updates to the dedicated project website www.limekilnwindfarm.co.uk including an online consultation page;
- a Freephone telephone number and dedicated email address;
- virtual meetings with the Caithness West Community Council; and
- virtual community engagement live chat sessions held on 18th and 19th May from 2-4pm and 6-8pm and then again on 1st and 2nd June from 2-4pm and 6-8pm.

Infinergy has been engaged in dialogue with the local community council and residents since the Limekiln Wind Farm project was launched 10 years ago. Through the various planning applications and determination processes, we have maintained contact, and in the run up to the initial enabling works, increased engagement in order to ensure the public were fully informed and engaged.

Following a newsletter updating the local community on the enabling works in December 2020, Infinergy attended Caithness West Community Council virtual meeting on 12th April 2021 and subsequently distributed newsletters to the local community (409 properties) in May 2021. The newsletter provided an enabling works construction update and details of the proposed variation to the existing consent and invited recipients to engage via an online consultation website hosting two rounds of live chat with the team. The virtual consultation was also advertised in the local newspaper.

The virtual consultation replaced in-person community open days due to ongoing pandemic restrictions and aimed to explain the proposal and highlight the main issues being considered using the same information that would have been presented in person: information boards, landscape and visual assessment photomontages, and zones of theoretical visibility. In addition, members of Infinergy's project team were on hand to answer any questions via live chat sessions which were provided twice a day over 4 days in both the afternoon and evening.

During the virtual consultation period, which ran from 11th May to 4th June 2021, the attendees were invited to fill out a 'Voice Your Opinion' questionnaire. Only one response was received during this period.

Consultation is on-going and will continue post submission.

1. Introduction

Infinergy embraces community consultation; it is at the heart of its approach to development. This statement provides detailed information regarding the Revised Consented Development community consultation.

2. Framework for pre-application consultation, Limekiln Wind Farm Extension

The Applicant's public consultation plans for the Revised Consented Development are influenced by THC's Pre-Applications Consultation guidance, alongside PAN 3/2010 which includes the National Standards for Community Engagement and Planning Aid for Scotland's SP=EED framework and comply with Scottish Government Guidance: *Coronavirus (COVID-19): development planning consultation and engagement advice - May 2020 (Appendix 11)*

This outlines how applicants of major infrastructure projects should undertake pre-application consultation with the community during the global pandemic. The aim of this procedure is to make sure that communities are still made aware of and have an opportunity to comment on these types of development proposals before a formal application is made. This allows community views to continue to be reflected during the process and gives the Applicant the opportunity to incorporate them into the proposals where possible before making a formal application, as has been the case for the Revised Consented Development.

The Guide outlines the consultation and involvement activities:

- Community Council consultation;
- Advertising virtual events; and
- Virtual public engagement.

3. Infinergy's approach to community involvement

The Applicant's general approach to community involvement in projects has been adapted to comply with Covid-19 Guidance and includes the following:

- Consultation with community councils and interested community groups;
- A dedicated project website;
- Production and circulation of digital information material for local residents; and
- Hosting of virtual community events prior to submission of the planning application, when the development is at draft design stage.

4. Consultation

Consultation that has taken place so far in this pre-application stage has enabled Infinergy to take forward its commitment to continuing a constructive relationship with residents and local representatives within the local community which started with the consented Limekiln Wind Farm project.

To consult on the proposal with the local community, Infinergy undertook the following activities:

4.1 Online Consultation Website

In 2012 Infinergy launched www.limekilnwindfarm.co.uk to provide information for residents and their representatives about the proposal for a wind farm at Limekiln Estate and allow them to give feedback by completing an online questionnaire or asking specific questions via info@limekilnwindfarm.co.uk - the dedicated email facility. This website will continue to provide information and updates relating to both the Revised Consented Development application process alongside the construction process and details of the proposed Limekiln Wind Farm Extension (in planning).

4.2 Freephone

The Freephone telephone number launched at that time for specific enquiries relating to the proposal continues to be in use (0800 980 4299), enabling residents to speak to members of the project team and receive additional information.

4.3 Newsletter

In early May 2021, Infinergy distributed 409 newsletters (**Appendix 1**) to the local community including residents and businesses in the local KW14 postcode area surrounding the project. The newsletters were posted via Royal Mail (1st class), using a specifically sourced database to reduce the risk of non-delivery. The newsletter provided an invitation to the virtual consultation events, and an overview/update of the project to date, including the successful completion of the initial enabling works.

4.4 Social Media

At the same time, Infinergy used its Facebook site (**Appendix 2**) to promote the news that Scoping had been submitted for a Section 36C application and directed interested parties to the project website for updates.

4.5 Virtual Community Engagement

A new online consultation page was developed for the website which was live from Tuesday 11th May until 4th June 2021. This gave stakeholders the flexibility to view the information presented and give feedback over a longer period than the standard public community open days.

Two rounds of live virtual community engagement 'chat' were held on 18th and 19th May from 2-4pm and 6-8pm and then again on 1st and 2nd June from 2-4pm and 6-8pm. Previous community virtual events held by Infinergy guided the times and format in order to ensure as many stakeholders as possible had the opportunity to engage. One person, known to the team, engaged in the first live chat session and was able to continue an existing and ongoing discussion. The use of live chat also meant that the Managing Director of Infinergy was able to join due to the nature of the event. The remainder of the chat sessions attracted only one other member of the public. Copies of the digital information panels can be found in **Appendix 3** and **4** and consultation webpage in **Appendix 5**.

Publicity

Invitations to the public exhibitions were sent as part of the newsletter, to all households within a 10km radius of the project, see **Appendix 1**.

In order to publicise the exhibition to the wider community, a press advertisement was also placed in:

- Caithness Courier – 7th May 2021

The same advert was shared with other relevant stakeholders, including the anti-wind group Caithness Wind Information Forum (CWIF), who also published details and informed their subscribers.

See **Appendix 6** for a copy of the advertisement.

Media

Press coverage both before and after the open days was extensive in the local papers (**see Appendix 7**):

- John O'Groats Journal
- Caithness Courier

Attendance

Based on online tracking data, the dedicated consultation page, over the period it was live, where they had the opportunity to inspect the draft proposal, contact the project team either via the live chat sessions or by email and complete a feedback form had 43 views in total. The link provided on the home page of the project website was used 16 times. Over the same period, the home page itself, which contains project updates, was accessed 162 times (**Appendix 7**).

5. Consultation Feedback

Throughout the community consultation programme we have received limited feedback and listed below is a summary of the key findings obtained thus far.

5.1 Newsletter

Due to covid restrictions, the usual tear-off feedback form included was not used. Instead, recipients were encouraged to email comments and questions.

Following the delivery of the newsletter, a handful of emails has been received regarding the project, one noting objection to the Variation proposals and others asking about community benefit and forest felling plans.

Copies of the email feedback can be found in **Appendix 9**. All personal details have been removed in accordance with the Data Protection Act.

5.2 Online Consultation Page

The online consultation page over the period 11th May – 4th June had 43 views.

5.3 Online Consultation Feedback

Online Consultation feedback forms were completed by only 1 attendee, living well over 5km from the project.

A copy of the returned open day questionnaire can be found in **Appendix 10**.

5.4 Summary of Feedback

Overall feedback for the Revised Consented Development was extremely limited, with engagement primarily coming from a small number of individuals who continue to be opposed to the project.

6. Community Benefit

Infinergy wants to help the communities surrounding its renewable energy projects benefit from it in as many ways as possible. Infinergy has committed to uphold the Scottish Government's guideline figure of £5000 per MW of installed capacity for the Revised Consented Development.

The most recent edition of the Good Practice Principles state that:

"There may be an opportunity to be more flexible in terms of widening the geographical area of benefit to reach a greater number of individuals and organisations who could support projects that are area-wide."

In light of this, Infinergy is considering using the same area of benefit as the North Highland Regeneration Fund, known as the 'Dounreay Travel to Work Area'.



The NHRF Area of Benefit.

6.1 Community Liaison Group

During the original application process for Limekiln Wind Farm, Infinergy brought a group of people together who represented local interests, including representatives from local Community Councils, Reay Primary School, the Chamber of Commerce, Highland Council, Highlands & Islands Enterprise and University of the Islands and Islands to form a Liaison Group to look at key strategic priorities for the local area. Infinergy plans to reinstate this group in due course.

6.2 Community Fund

A fund will be established for the Limekiln Wind Farm project to manage the cash element of the community benefit package. This will have a board of trustees supporting initiatives within the identified 'Travel to Work Area'.

Via the exhibition opinion forms and website, local residents have been encouraged to give suggestions as to what they would like to see such a fund used for. Suggestions to date have included:

Suggestions received (quoted from previously filled in feedback materials)

- I suggest that the money is spent to create training programmes and actual jobs within the Caithness and Sutherland area. People can be trained in a huge number of areas (renewable energy, engineering, ICT, ecology, lab analysis) and their jobs could be directly supported by the fund.
- Decrease the local energy bills.
- I think there should be a community enterprise project to invest in local facilities, improve opportunities for business and increase the villages attractiveness for new people to move in. A community enterprise would create employment, training opportunities, services for the elderly - meal on wheels, lunch club, and hopefully a vibrant sustainable village.
- Outdoor charging points for e-bikes.

7. Response to Consultation Feedback

Further to the consultation process outlined in this statement, a number of activities have or are being undertaken in order to respond to feedback received. These are detailed as follows:

Web/email

Everyone who submitted a question or query either via the website questionnaire or by email direct has been responded to electronically, or in the case of the live chat event, followed up by telephone directly.

8. Future Consultation

Next Steps – Pre and Post Submission

Infinergy is committed to the continued involvement of and consultation with the local community and other stakeholders throughout the planning process.

Even though the pre-application consultation has been completed, this does not mean that the consultation will end. Infinergy is committed to further consultation during the planning determination period, ensuring that local residents and stakeholders continue to be involved in the process and are kept informed of the proposal's progress.

Newsletters

Following the newsletter distributed in May 2021, a further newsletter encouraging feedback to be submitted to the appropriate planning authority will be distributed when the application has been submitted.

Stakeholder/Interest group briefings

Infinergy will continue to attend local community council meetings in order to provide continuity throughout the whole development process as well as through the ongoing construction process.

Media relations

Media relations activity will be ongoing. Once the application has been submitted, a news release detailing the submitted proposal and consultation outcomes will be issued to the media. Infinergy will respond to media enquiries and requests for information throughout the determination time period.

Ongoing response to queries

Infinergy will continue to respond to queries that are received via the various consultation channels i.e. email, Freephone telephone number, freepost address, website and newsletters.