



26th October 2023

Planning Department
North Devon District Council
Lynton House
Commercial Road
Barnstaple
EX31 1DG

ATTN Mr. N Hall

Dear Sir

Re: 77576 - White Cross Offshore Windfarm (Onshore Project)

Full planning permission for the construction and installation of onshore electrical infrastructure required to export electricity from the White Cross Offshore Wind Farm to the national distribution network; including installation of 132kV underground electricity transmission cable(s) from landfall at Saunton Sands Car park to a new substation at East Yelland. Construction of temporary facilities required during construction to include haul road, vehicular access, compounds, associated works areas and a permanent substation access road. Construction of a new substation under the Rochdale Envelope Approach with additional information regarding architectural form and silhouette, design code, scale and layout, landscaping, lighting, and appearance and materials.

We strongly object to this proposal.

This application is driven solely by the applicant's agreement for a grid connection at Yelland having requested either Yelland or Alverdiscott. It is not clear why either of these connection points were requested given the location of the offshore site. Nor is clear as to why the applicant is progressing the Yelland substation given its capacity limitations which will be a significant constraint on the applicant given that the Crown Estates Celtic Sea has three Project Development Areas each capable of generating 1.5GW.

The applicant state this is currently a pilot project raising the question of what happens when their current project is deemed successful, and they seek to increase energy and revenue generation capacity? Given the development cost implications of the current proposal it is not unreasonable for us to assume that the applicant at some point in the future would look to develop further the onshore infrastructure if this application is approved.

Nor is it clear why the chosen landfall is Saunton Beach when there are more direct routes to this grid connection which would avoid sensitive landscape and disruption to the Parish of Braunton.

It is disingenuous of the applicant to say that "no significant adverse effects are predicted on socio economics or recreation in the local area". This conclusion appears to have been reached based on consideration of the local area as being North Devon and Torridge. It should have been very specific to the Parish. The Parish Neighbourhood Plan details the importance of tourism and recreational activities to our local economy. Local business that survived the impact of the pandemic should not have to go through another 24 months plus of disruption.

We note that the applicant has taken into account the Parish Neighbourhood Plan which has now been formally adopted so the proposal is required to be in compliance with it. In considering the application against the Neighbourhood Plan policies we believe that:

Policy NE1 Locally Valued Sites of Biodiversity and Habitat

This proposal will have adverse impacts. It is of great concern that the applicant proposes to use bentonite which poses a significant pollution risk to both land and water. We were encouraged that the proposed cable route had been revised following pre-application guidance and will no longer go through the centre of Braunton Burrows. However, the proposed route crosses landscape which may not be designated but is still sensitive as it includes the buffer zone for the core dune system, is in very close proximity to two SSSIs and a marsh habitat that evidences Braunton's agricultural history. This area is known for a rich and diverse wildlife and in particular resident and migrant birds. It is an important wildlife corridor that will be disrupted by construction activity specifically destruction of habitat as well as light and noise pollution.

Policy NE2 Protection of the Caen Valley Bats SSSI and the Parish Bat Population

The various bat surveys taken across the entire line of proposed construction could not illustrate more clearly the disturbance threat to the bat population. Nor has the proposal considered the cumulative effect on the bat population of this area through which the proposed route passes. The applicant suggests that in some instances the loss of habitat will only be temporary – temporary is not defined. The potential light pollution from construction activity does not appear to have been considered other than a broad statement of being addressed through “embedded mitigation” – also not defined by the applicant.

Policy NE3 Protecting and Increasing the Parish's Biodiversity

Policy NE4 Protecting Devon Banks, Hedgerows and Trees

Policy NE7 Protection of Parish's Strategic Nature Areas

The applicant's calculations show an unacceptable biodiversity loss across all three habitat modules (broad habitats loss of 24.22%, hedgerows loss of 36.52% and watercourses – 3.03%) in a location that is within the Parish's Strategic Nature Area. The potential loss of trees will also be a lost bat roosting habitat. Their proposed mitigation strategy is unlikely to repair the damage that the construction activity will inflict let alone increase the BNG by the required minimum of 10% net gain. We are greatly concerned that a significant proportion of this proposed mitigation is likely to be off site rather than on site and in some cases not necessarily in the local area at all.

The proposed S106 has not been submitted with this application as we understand it is still being negotiated with NDC. We also note that the actual strategy for 10% BNG has not yet been written. This application is not compliant with NE7 and appears not to be compliant with NE3 given the lack of detail. It is also not compliant with NE4 which requires replacement to an equivalent scale effect or massing to ensure a minimum 10% net gain to local biodiversity on site or in close proximity within the Parish.

Policy NE6 Protection of Landscape Character

The proposed onshore cable route and associated construction works will have a negative impact upon the landscape and in particular landscapes 2, 3 and 7 as detailed in the Neighbourhood Plan.

Policy NE8 Water Courses and Drainage

The applicant has described the numerous potential impacts that construction work could have on the water courses and drainage along the proposed route, but has given no specific mitigation details other than high level statements of intent. Again, the applicant is indicating the approach of embedded mitigation to the problems.

Policy BE4 Adoption of Appropriately Scaled Renewable Energy

The proposal for the associated infrastructure of the offshore windfarm has an unacceptable impact on local amenity, the enjoyment of or access to public rights of way and other access routes, and public safety. These impacts cannot be mitigated.

Policy BE9 Vehicle Movement Assessments

Policy BE10 Improving Transport Accessibility and Connectivity

The applicant has carried out a transport assessment, however the way it is structured (over a different four chapters) makes it difficult to assess whether it addresses the required areas in policy BE9. In particular the way in which it "will mitigate impacts of additional traffic onto the local road network."

The applicant in table 19.11 lists the mitigation to be embedded which is mostly through a Construction Traffic Management Plan – the outline of which is provided though the detail has yet to be filled in.

We have grave concerns about the impact of construction traffic on the local road network particularly the junction of A361 / Caen Street and then the approach road and access road for Saunton Beach.

The applicant's documentation downplays the significant impact that the additional construction traffic will have on the local community and its safety.

Policy BE12 Protection and Improvement of Air Quality

We are disappointed that the Environmental Health Consultant for North Devon District Council agreed that no site-specific surveys needed to be undertaken. We believe that in order to be compliant with this policy the applicant should carry out an air quality survey in respect of PM2.5 and PM10 levels across the proposed cable corridor and construction traffic routes paying particular regard to Brauntons' AQMA. This would then establish the baseline against which air quality during the construction period could be monitored.

The applicant's documentation indicates unacceptable levels of particle pollution on the ecology of the area whilst relying on the prevailing wind to disperse the particles away from "human receptors".

Chapter 13 Paragraph 165 states that: *Emissions of exhaust pollutants, especially NOX and PM10 from construction traffic on the local road network, have the potential to impact upon local air quality at sensitive receptors situated adjacent to the routes utilised by construction vehicles.* Given this statement we are very concerned about the lack of consideration of the impact on Caen Street business, pedestrians, cyclists and the primary school playground that fronts onto the road.

Policy BE13 Protect and Promote Dark Skies

The applicant has carried out a Light Impact Assessment, but it is only in respect of the Yelland substation.

It is clear that should this proposal go ahead there will be illuminated construction compounds, illuminated night time working and construction traffic lights during winter months given the proposed hours construction. The applicant's figure 20 – 25 in Chapter 20 Appendix D clearly shows the proposed cable route as being an area that is below 0.5 lux. Construction activity will have a significant impact on the intrinsically dark areas across the Parish. We draw attention to the impact on nighttime wildlife in particular the bat population as evidenced by the applicant's own bat surveys in Chapter 16.

In summary it is clear that the proposal, when considered against many of the Parish Neighbourhood Plan policies, cannot be described as being in compliance with them and therefore it should be refused.

Love Braunton

Cc Braunton Parish Council