

Our Ref: 77576  
Please ask for: Mr N. Hall  
Date: 4<sup>th</sup> March 2024



F.A.O Miss Kathryn Humber  
White Cross Offshore Windfarm Ltd  
12 Alva Street  
Edinburgh  
Scotland  
EH2 4QG

Dear Kathryn,

**Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (Regulation 25)**

**Town and Country Planning Act 1990 (as amended)**

**Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended)**

**White Cross Offshore Windfarm (Onshore Project) Application No. 77576**

**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.**

I write further to my letter of 5<sup>th</sup> December 2023 and our recent correspondence regarding the submission of further information that was due to be provisionally submitted on 23<sup>rd</sup> February 2024. Given the information has not been submitted to date and that I require further information beyond that which you originally intended to submit at that date; I am writing to formally request the following further information, under Regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

The request is also in accordance with the Environmental Impact Assessment Regulations guidance that further information requests should be limited to the "main" or "significant" environmental effects to which a development is likely to give rise. However, this does not preclude you from submitting additional information and clarification that you may deem beneficial. In respect of the latter, you may benefit from addressing other concerns expressed in responses from consultees and representations.

In respect of the above, I request the following information:-

At this juncture there is a lack of appropriate surveys and assessment relating, in particular to bats, wintering birds, Great crested newts, petalwort and badgers. Given the timings of some of these surveys, it is unlikely the information required will be available until June 2024. Further to this there may arise a requirement for a second year of survey work. I therefore request further information is submitted relating to these surveys and having

regard to Natural England's consultation response of 3<sup>rd</sup> November 2023 and Devon Wildlife Trusts letters dated 3<sup>rd</sup> October 2023 (Received 3<sup>rd</sup> November 2023) and 21<sup>st</sup> February 2024.

The above matters also have an impact on the Habitats Regulation Assessment process and as such need to be addressed in order to inform the Report to Inform the Appropriate Assessment which should be updated to reflect consideration of the new information. It should be noted that any similar requirements for the Offshore element of the application will also impact on the HRA and EIA in combination and cumulative impact assessments.

There is a lack of information relating to the likely significant impacts as a result of cable route construction activities. In particular relating to lighting, fencing, security, containment, noise/vibration, hydrology, drainage impacts, flood risk, ground investigations (geological), UXO onsite identification/detection and detonation methodology, coupled with the potential resulting impacts from these matters on ecology, designated sites, land, water bodies and drainage channels, the public and residential/holiday accommodation.

The potential impacts of maintenance activities requires a more precise detailed explanation/assessment.

The proposed chosen methodology for landfall will require explanation and reassessment of implications on duration of works, method of working, public safety and restrictions, car parking issues, and traffic implications together with any other associated direct or indirect impacts.

As previously advised the Waste Audit Statement is considered unsatisfactory and does not comply with the requirements of the DCC Waste Management and Infrastructure SPD and Policy W4 therein which requires a detailed statement at application stage. It is therefore requested said statement is submitted in compliance with the requirements.

More site specific detail is required for ALC and soil surveys and assessment to allow for an informed appraisal of compliance with development plan policy.

More detail, coupled with associated impact assessments are required for HDD activities and likely effects of potential "frac out" (Hydrofracture) relative to the precise geological characteristics of the areas subject to HDD operations. A Ground Investigations report should also be provided. An assessment of Impacts on hydrology and hydrogeology should be undertaken, particularly in relation to designated sites and flora/fauna. Impacts and containment methodology in general and specifically for TJB's should be assessed in detail.

The proposed submission of an interim LEMP is welcomed.

As previously advised it is considered the Flood risk and drainage assessments are considered inadequate and I refer you to responses from the Environment Agency and Lead Local Flood Authority. An adequate FRA and drainage assessment should be submitted.

Decommissioning impacts could benefit from further consideration in matters such as retaining the landscaping and attenuation measures associated with the substation if the substation is no longer required at the end of the project life. i.e likely beneficial environmental gains. Re use of cable corridor/ substation/ alternative uses. Further information should be provided as to likely impacts and outcomes of decommissioning. An assessment and details of a decommissioning bond to ensure finances are available for any works required should be provided.

You may also benefit from revisiting the alternatives, scrutinising robustly other potential engineering solutions for the cable corridor.

Generally, the Environmental statement is not easy to navigate. Clarification and signposting would aid the submission of further information.

The above request for further information and clarification does not bias any future course of action or decision by the Local Planning Authority in accordance with applicable legislation and regulations.

I would be pleased if you could confirm your intended date for the submission of the further information and clarification requested by the 18<sup>th</sup> March 2024.

Yours faithfully

Neale Hall

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