



10th March 2026

Planning Department
North Devon District Council
Lynton House
Commercial Road
Barnstaple
EX31 1DG
ATTN Mr A Sierakowski

Dear Sir

Re: 81428 White Cross Offshore Windfarm (Onshore Project)

Approval of details in respect of part discharge of condition 31(a) (Bat Mitigation Strategy - Pre-construction survey data in relation to 'The Scope' of the surveys only) attached to planning permission 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)

We object to this application as currently submitted.

The document WHX001-FLO-CON-CAG-STR-0001 White Cross Offshore Windfarm Bat Survey Plan is very limited in both scope and detail.

- WHX001-FLO-CON-CAG-STR-0001 White Cross Offshore Windfarm Bat Survey Plan refers to two interactions with Natural England in Jan and Feb 2026 but no detail as to what these exchanges addressed other than Natural England required the survey to start mid – March.
- The application is poorly timed given that Nat England advice is to start mid March - the same time that LPA consultation ends. Presumably this is why WX are asking the LPA to accept an end of March survey start.
- This ask is assuming that the application is approved very soon after public consultation closes - on what basis is this assumption?
- Reference is made in the applicant's document to the Bat Conservation Trust Guidance but the applicant's proposed 12 month survey effort falls far short of what is required. For example it is not clear how the proposal aligns with the guidance given in Chapter 8 in respect of bat activity surveys. This chapter details the questions that the survey should be addressing. These questions are not considered in the applicant's scoping document.

- The applicant states that they are using prior knowledge to shape their proposed approach by relying on data that is over 3 years old to inform the scoping document. This is unacceptable as the guidance clearly states at Chapter 2.6.18 that reports based on survey data older than 3 years are likely to require the surveys to be repeated.
- Natural England were not happy with the limited surveys that the applicant originally carried out. This was/is evidenced by Natural England's final consultation response in February 2025 to the LPA and the supporting Annex B3.1 Protected Species detailing the outstanding Risks and Issues. The two sheets (Annex B2.1 and Annex H) in this Annex are explicit in respect of their concerns about the missing information in respect of bats and what Natural England advised the /required from the applicant.
- The proposed survey document Figure 1 indicates where static detectors will be placed and where limited night walkovers will occur. When compared with the applicant's own mapping of the cumulative manual dawn and dusk bat activity survey results for April - October 2022 in Environmental Statement Chapter 16 Appendix D Figure 3-1 the lack of coverage of the proposed survey area can be seen.
- Similarly, the Environmental Statement Chapter 16 Appendices 16C to 16G illustrate the required coverage and type of surveys that need to be undertaken – emergence, buildings and trees for roosting. These activities have not been addressed by the applicant.
- Reference is made to the use of Night time Bat Walkovers(NBW) for a small section of the route. The Bat Survey Guidance section 8.2.14 – 8.2.28 details why, how and when of this type of survey activity. It is not clear from the applicant's document how they will comply with this guidance particularly paragraphs 8.2.14, 8.2.27 – 8.2.28.
- The proposed survey activity is totally inadequate when viewed across the entire zone of influence, the development corridor and where bat presence / activity was recorded 3 1/2 years ago!
- The majority of the route area lies within the 5km Caen Valley SSSI foraging range of the Greater Horsehoe Bat, has a significant new roost at Saunton opposite where the proposed access and construction site will be as well as two buildings that have been identified as roost sites.
- No details are given as to the competency of the author of the proposed scoping document or details of the team that will undertake the proposed survey activities. This is contrary to guidance of both Natural England and Bats Conservation Trust.

The applicant should withdraw this document and revise it so as to provide the baseline for information required to address the ongoing outstanding issues detailed by Natural England and shape a robust best practice mitigation strategy for the Parish' bat population who inhabit this area of sensitive landscape.

We ask that the application as it currently stands is either withdrawn by the applicant or refused by the LPA.

Love Braunton

Cc Braunton Parish Council