

22nd June 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 maintain our objection to this application following review of the revised scoping document which continues to be limited in both scope and detail.

The applicant appears to have added specific detail in respect of equipment to be used, grid references for the static bat detectors, nighttime bat walkover survey effort and restated Figure 1 to reflect increase in transect routes. Their proposal for the surveys – walkovers, static, buildings and trees continue to be predicated on findings of their initial surveys carried out between April to October 2022 – some 4 years out of date.

This is clearly not compliant with best practice articulated in the Bat Trust Survey Guidelines section Age of Survey Data paras 2.6.16 - 2.6.22 which indicates that data should be no more than 2/3 years old.

- The proposal's description of Condition 31(a) is very limited referring only to preconstruction survey data. The actual wording of Condition 31(a) states "Pre-construction survey data across the entire development area for a full calendar year. The scope (i.e. aims, objective and methodologies) of the survey will be agreed with the LPA (in consultation with Natural England). The scope is greater than defining survey data and has not been explicitly addressed in the revised document. This omission was flagged in Natural England's response 16th March 2026. Specifically: *"There is little detail provided on the potential impacts of the White Cross development on bats and how the proposed survey coverage plans to address them outside of the hedgerow removal and proximity to the satellite roost at East Saunton Farm. Locations for*

static and transect surveys should be designed in reference to activities such as proposed hedgerow removal, habitat fragmentation, temporary and permanent impacts and details of how these locations were selected should be provided. No details have been given regarding how the bat data from the static and transect surveys will be analysed and used to assess these potential impacts. Natural England requests that this is provided to ensure the data collect from the bat surveys will be sufficient to inform a Bat Mitigation Strategy.” The revised document now has a general paragraph at bottom of page 1/10 that refers to this element of the condition but gives no detail against which an informed Bat Mitigation Strategy can be developed. It certainly does not address the points made by Natural England.

- Given the applicant’s failure to address the above point it is not certain as to how or indeed if the amended document addresses the subsequent advice received from Natural England between March - May 2026 as stated. There is no actual detail as to what that advice was other than the applicant claiming that it has informed the amended document. This is of concern as to date the applicant has not fully addressed any advice given to them by Natural England. As we have previously observed 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 /required from the applicant.
- Condition 31 states that a full calendar year of data is required. The timing of these proposed surveys only indicate the months they will be conducted not the year. E.g. Nighttime bat walkovers (NBW) every month from April to October, 6 static detectors for a full year starting mid-March. Does this mean the survey activity starts in 2027 or does the applicant intend to commence the surveys once this application is approved? The revised document does not address/acknowledge when surveys will commence given that this is now mid-June 2026.
- Reference continues to be made in the applicant’s document to the Bat Conservation Trust Guidance, but they have not evidenced how their proposal aligns with the guidance given in Chapter 8 Bat Activity Surveys. E.g No detail in respect of questions that survey will be addressing, no daytime bat walk over to inform the nighttime bat walkovers, dusk or dawn to dusk surveys depending on time of year.
- The revised survey scoping document Figure 1 indicates where the static detectors will be placed and where the 4 night walkovers will be done. The proposal continues to be very limited in coverage 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. It disregards the zone of influence which is greater than the onshore development area given the distances that bats fly as well as Devon Wildlife Trust response 18th March which advised that there should be a NBW for each static detector.
- No consideration has been given to or details provided for potential impacts of WX development on bats or monitoring activities during construction phase as advised by Natural England in their March 2026 response.
- First new section 1.2 Building Surveys appears to be predicated on the belief that the onshore development area will not impact any of the buildings. It is unclear why buildings deemed outside the red line boundary will not be impacted as they fall into a zone of influence. It appears that Natural England have raised a query in respect of this exclusion. The proposed approach is very limited and does not appear to follow the guidance in Bat Survey Guidelines Chapter 5 figure 5.1.
- Second new section 1.3 Tree Survey states that Ground Level Tree Assessment (GLTA) will adhere to Bat Survey Guidelines Chapter 6 with findings reported back to Natural England by 21st August 2026. To adhere to the GLTA guidance then the survey should be carried

out during winter months when there are no leaves on the trees as stated Chapter 6 Figure 6.1 4b and paragraph 6.7.15.

- The proposed approach takes no account of the 29 trees already identified as having roost potential in the WX Environmental Statement Chapter 16 Appendix 16G nor does it follow the advice given in Appendix 16G Discussion section 4. This section suggests that the next survey stage should be that of Potential Roost Features (PRF).
- There continues to be no details given as to the competency of the author and reviewer of the proposed scoping document; or details of the team that will undertake the proposed survey activities, subsequent analysis of the survey outcomes and drafting the strategy. This is contrary to guidance of both Natural England and Bats Conservation Trust.
- Given that Application 77576 required both an HRA and EIA then the required level of competency should be at least 4/Authoritative as defined in the Bat Survey Guidelines Table 2.3.
- We are concerned by the proposed approach to species identification as stated on page 5/10 paragraph 7 "*Where species-level identification is not considered reliable from acoustic data alone, including for some Myotis species and Plecotus species, calls will be assigned to genus or species-group level. The limitations of acoustic identification will be clearly stated in the reporting.*"

The applicant's bat surveys of 2022 identified the presence of Plecotus (grey and brown long eared bats) and Myotis (mouse eared bat) species. WX Environmental Statement Chapter 16 Appendix 16D details the areas along the development corridor where these species were recorded. Of particular note is the table for Sandy Lane Farm/agricultural fields, Saunton Golf Course & Saunton Sands Dunes/Beach and Saunton Road. The grey long eared and mouse eared bats are endangered species.

We are aware that a resident who lives in this area has taken part in two citizen science surveys with Deven Wildlife Trust and North Devon National Landscape – 2025 and 2026, and that both surveys recorded possible Grey Long Eared Bats. To differentiate between Plecotus Austriacus (grey) and Plecotus Auritus (brown) and overcome "*the limitations of acoustic identification*" DNA testing of bat droppings needs to be done. Natural England has been made aware of the resident's findings and we understand that bat species type are a material consideration in the issuing of bat licenses. Given the potential presence of grey long eared bats then the precautionary principle should be applied and the applicant required to specifically identify the bat type at individual level.

The applicant must make further revisions to this document so as to ensure that the scope clearly defines what information is required, how that information will be collected, analysed and then used to inform the Mitigation Strategy that will protect the Parish's bat population who inhabit this area of sensitive landscape.

We ask that the scoping document as it currently stands is either further revised by the applicant to address all the issues or is refused by the LPA.

Love Braunton

Cc Braunton Parish Council
 Natural England
 Devon Wildlife Trust