



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

NORTH FALLS OFFSHORE WIND FARM

Appendix L7 to the Natural England Deadline 7 Submission

**Natural England's comments on 7.10 Offshore In-Principle Monitoring Plan (Rev 1)
(Tracked) [REP6-032] with regards to Migratory Bats**

For:

The construction and operation of North Falls Offshore Wind Farm, located approximately 40 km from the East Anglia Coast in the Southern North Sea.

Planning Inspectorate Reference EN010119

15 July 2025

Appendix L7 Natural England's comments on 7.10 Offshore In-Principle Monitoring Plan (Rev 1) (Tracked) [REP6-032] with regards to Impacts to Migratory Bats

In formulating these comments, the following documents have been considered:

- [REP6-032] 7.10 Offshore In-Principle Monitoring Plan (Rev 1) (Tracked)

1.Detailed Comments

1.1 Although the evidence gaps pertaining to bats and offshore wind turbines are acknowledged and a literature review conducted, the Applicant is not proposing to undertake any site-specific offshore monitoring of bats, contrary to the recommendations within Natural England's Deadline 5 Examiner's Questions response [REP5-110]. Use of acoustic detectors attached to buoys, boats or existing wind turbines, and surveys utilising night vision aids to gather data on presence/absence and offshore bat behaviour are not proposed, and the Applicant's review of existing offshore wind farms has for the most part only highlighted the limitations and difficulties existing schemes experienced surveying for bats at sea.

1.2 The Offshore In-Principle Monitoring Plan (OIPMP) [REP6-032] states that '*There is potential that existing conservation and monitoring projects in the area would have the capabilities to conduct migratory bat monitoring on behalf of North Falls. For example, this could include providing funding to the BCT National Nathusius' Pipistrelle Project (NNPP) or collaborating with the Motus Wildlife Tracking System*'. We consider that, it is not sufficient for commitments to undertake monitoring for migratory bats to be unspecified and lack any certainty at this stage in the process. The Applicant, if relying on third parties to provide monitoring on their behalf, should have correspondence with these organisations to confirm if this is possible. Likewise, the OIPMP states that '*where practicable, the project should work collaboratively with Five Estuaries Wind Farm*'. It is not clear what constitutes this collaboration, which we consider essential, being practicable and under what conditions this will or will not be possible.

1.3 Financially contributing to NNPP or MOTUS, even if possible and agreed with the third parties, is not sufficient in our view. This is because it will not provide site-specific data or evidence on which to inform whether mitigation is required or what measures are necessary, as there is no feedback loop proposed to utilise the data being gathered. It will also not address the issue of cumulative impacts from four different wind farm schemes operating in proximity to each other within a potentially important migratory corridor for bats; not least because the impacts of the two existing windfarms (Greater Gabbard and Galloper) on migrating bats are not currently being monitored. Therefore, as well as financially contributing to both these bat monitoring projects and this being secured with the relevant organisations as a feasible option, we advise that there needs to be a commitment to review North Falls's operation in light of the data and information gathered by those bat monitoring projects.

1.4 Furthermore, a mechanism needs to be established to design and deliver a future collaborative strategy for monitoring and, if needed, mitigation. We recommend that the Applicant should together with Five Estuaries convene and promote a Migratory Bat and Offshore Wind Working Group with the operators of the operational wind farms in the vicinity,

(currently the two 'parent' sites Greater Gabbard and Galloper offshore wind facilities), Natural England, and other relevant stakeholders.

1.5 The Working Group should collaborate to carry out migratory bat monitoring in the area; support, develop and utilise national data gathering projects; and, if required, devising and agreeing mechanisms to reduce impacts to migratory bats. This would reduce the risk posed by the complex of wind farm schemes in this part of the North Sea, which may be having cumulative impacts that could be exacerbated by the North Falls project. Another benefit of working collaboratively is that should monitoring indicate that mitigation is required, it can be applied consistently across the different projects and can be periodically reviewed and adapted as new technology and guidance emerges.

1.5 We also consider that the duration of the OIPMP of six years (including five years construction and one-year post-construction/operation) is not adequate for offshore impacts. If evidence gaps are to be addressed and the potential impact on migratory bats of North Falls OWF scheme properly identified and if required mitigated, contribution to monitoring projects and utilisation of this data should continue for at least 6 years of operation (NatureScot 2021, Rodrigues *et al* 2015). Mitigation measures, if needed, would need to be enacted for the duration of the operation of the scheme.

1.6 It is not possible to provide detailed comments on the onshore proposals for bat survey for migratory bats. It is not clear what surveys would involve as the OIPMP states; '*A survey effort using static detectors and walked transects, as conducted for the ES, specifically in habitat areas at the project's landfall*' and that it will be in line with BCT Survey Guidelines (Collins 2023; or equivalent up to date guidelines at the time). However, the surveys set out in the guidance are not designed for this purpose and therefore may not assist in assessing potential impacts on migratory species specifically. The reasons for onshore monitoring are given as '*To improve the evidence base of bat activity at the landfall location of the Project, including identification of individual bats which have migrated between mainland Europe and Essex*'. However, acoustic monitoring cannot be used to identify individual bats. This is only achievable through trapping and ringing and/or radio tracking.

Therefore, the Applicant needs to set out the full scope of the surveys, including seasonality and timing and how data will be analysed, and how this will allow them to identify individual bats which have migrated.

2. References

Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition). The Bat Conservation Trust, London.

NATURESCOT (2021). Bats and onshore wind turbines - survey, assessment and mitigation. Version: August 2021

Rodrigues, L. Bach, L. Dubourg-Savage, M.-J. Karapandža, B. Kervyn, T. Dekker, J. Kepel, A. Bach, P. Collins, J. Harbusch, C. Park, K. Micevski, B. Minderman, J (2015). Guidelines for consideration of bats in wind farm projects. Revision 2014. Eurobats Publication Series. 6. UNEP/EUROBATS Secretariat, Bonn, Germany