

Representation for EN 010137

Rebecca Face affected party 20048555

Dear Exa Panel members,

I am writing to expand on my initial objection to the Mona offshore wind farm project.

My primary concern is that the river emanating from two springs, that border the B5381 between land plot 06-097 and 06-100, will be permanently and completely stopped, resulting in the total destruction of the 3 acre wetland in the valley below. Damage to these springs will also result in irreparable damage to the complex eco system that lives in this wetland and the wider area, and the death of several protected species. It will also result in irreparable damage to the trees and habitats that support all the wildlife that transit through this important and rare green corridor. The guaranteed damage to these springs will likely also cause severe flooding in the land plot 06-100 and associated road flooding, and extreme ice risk in winter.

Secondly there is a further spring in the field of land plot 06-097, that will be moved (if not stopped entirely) by these underground works. This will potentially cause the entirety of the agricultural plot to become agriculturally (and therefore commercially) unviable in perpetuity. There is also an important issue regarding loss of access to this land, and loss of pasture, which will force the permanent closure of the farming business.

Thirdly there is significant practicality, and environmental issues regarding the proposed location of the gateway access for TCC2.

It is important to note here that all of the problems outlined above, would not exist if the applicant's written application simply matched the verbal descriptions of what they intend to do.

The applicant's verbal description is as follows. During the on-site visit of the EXA to the area of TCC2, the two representatives of the applicant stood in the bus stop at the junction of the B5381 and the A548, behind the minibus and told the EXA the following FACTS:

!st rep "The gateway for TCC2 is going over there on the A548." Pointing towards the A548 at the north end of TCC2.

2<sup>nd</sup> rep "no its not, it's going right here" and he pointed to the hedge on the south side of TCC2 , opposite the bus stop. 2<sup>nd</sup> rep continued" and the cable is going through here, north to south, and continuing down to TCC3, over there." As he indicated the line of cable with his arm running north to south, crossing the B5381 at the eastern most side of the cable corridor alongside the A548.

If the applicant's written application stated either of those gateway options, and stated that the cable would run directly from plot 05-093, crossing the B5381 and entering plot 06-100; then I would whole heartedly support this project. However, at this time the application does not state any such thing, and in its current state constitutes an ecological disaster.

My primary concern are the two springs that form the river head on either side of the B5381. There is one spring on each side of the road. The spring on the south side (on the verge beside plot 06-100) is at the end of the flood plain ditch that prevents the 2 springs flooding into plot 06-100 when both springs are in full flow, (see picture 1). The flood plain also ensures that the river and wetland are not deprived of water. This hydrological system is stable and safe. It does not dry out and does not flood the road.

The surface water, once ejected from the underground fractures, is then channelled through pipes under the road to the outlet at the boundary between plot 06-097 and the small house on the west side. The surface water then flows between the house land's boundary and the ancient woodland, (see picture 1). The water flows along the riverbed until it runs across the flat wetland on the base of the valley between the two steep valley sides of ancient woodland (see picture 2).

The problem with the application is that they want to drill holes through the fractuous bed rock that the springs rise through, (see picture 2 for the cable route stated in the application and the cable route stated verbally). Any digging or drilling in this area will guarantee the movement of these springs. As with all springs, there is no underground mapping for the fractures that the water is travelling through. The applicant cannot avoid the fractures as they do not know where they are. They are unavoidable. Any disturbance of the ground in proximity to these springs will cause the crumbly fractures to shift and alter the pressures. The water will change track, it is unavoidable, uncontrollable and once it has moved it is irreparable. Any attempt to "repair" the damage or move it in a specific direction will simply result in further movement and damage.

Springs of this pressure have the potential to move miles when disturbed, will the DCO force the applicant to mitigate this damage by building a pumping station at the new site of the spring and pump the huge volume of water back to the current outlet so that the river can continue to flow, and keep that equipment pumping in perpetuity? (I will take this moment to point out that in perpetuity means forever, but I will limit this problem to a more manageable time span, the remaining life span of our sun, which is 4.5 billion years approx. I won't bore you with the math of what that mitigation would actually cost in build, maintenance and fuel to run the pumping station. I will simply point out that the cost would be vastly prohibitive.)

This is an uncontrollable movement of a river. The applicant has already stated that the council has refused them permission to move the controllable surface water of another river. The Exa and the council really must refuse the uncontrollable and unpredictable movement of this one.

The application acknowledges that ground water in this area rises through fractures in the bedrock, ie springs. The application does not acknowledge that these two springs, flood plain ditch, river or wetland even exist.

The stopping up or drying of this river, due to the springs moving away, will obviously cause the complete drying up of the wetland below. Wetlands are protected habitat. When the wetland is drained the entire eco-system will die. All the plants and animals within this environment are

specially adapted to extreme wet conditions and cannot survive being dry. This includes the long stand of trees that grow along side the flood plain next to the B5381, labelled G42 on the tree surveys and the trees labelled T87 (which grows directly over one of the springs) and T88 (which grows close to the river outlet) and T86 who's root spread also taps into the spring.

There is also a significant risk to road safety in winter from the movement of the water flow. If the water moves to 06-100 it will then flow out of the gateway and onto the B5381, away from the A548 and into the valley. This section of road is extremely steep and national speed limit. The risk from sheet ice (which this area experiences regularly in winter, this is a high elevation area) on this section of road is a very high risk of death to humans.

I quote Mona's application document- environmental statement F3.2 hydrology and flood risk page 9 of 82- "the secretary of state must refuse development consent where a project is likely to cause deterioration of a water body or it's failure to achieve good status or good potential"

This problem, and the following problems, can all be resolved by simply narrowing the corridor to keep all the cable trenches within 100m of the A548. This will give the applicant the max work area that they say they need and will give the springs the max possible buffer to prevent damage.

During my discussions with the applicant, the only reason they have ever given me for the extra width that they're asking for at this location, is that they want to avoid a "hard bend". The angles of turn between TCC2 and TCC3 are 29 degrees and 55.5 degrees (see picture 3). This is a very gentle sweeping curve which will not be altered by reducing the width of the corridor. This is in comparison to a 96.5 degree bend followed by a 68 degree bend on works plan onshore sheet 10, (see picture 4) and an 100 degree bend on sheet 7, where the corridor appears to be at its minimum width of 74 m, (see picture 5).

My second concern is the spring within the field, (see picture 1). The problem is essentially the same as for the road springs, any ground disturbance will move the spring. It's location is the road's edge. It would only need to move a few inches and it will no longer flow across the field it would flow down the road or into the field across the road, leaving this land parcel with no water for either livestock or horticulture, which will force the closure of the farming business.

The gateway and unnamed road that it turns off are also severely affected during construction. The application states the land will be fenced off and the road closed. The applicant does not seem to be aware of the law, livestock must be fed, watered and checked every day. It is not possible for any farmer to simply close the gate and walk away for four years + until they decide that they've finished their project.

The third biggest concern is the access gateway into TCC2. The simple fact of this issue is that the applicant's cable delivery truck will NOT fit through the gate. The specification of this truck is an astonishing 28.816 meters long by 4.5 meters wide, ( see picture 6). The gateway is 61 meters down the road, past a choke point, with an 85 cm high verge on the opposite side. To facilitate this truck getting through this gateway would require the complete removal of the verge and trees on the opposite side, or the expansion of the bell mouth to such an extent that there will

be no safe separation from the A548, and the removal of 30+ meters of bat feeding hedge. The drawings and descriptions in the application are hopelessly inaccurate.

In summary, the 100m of land that the applicant needs is available and suitable next to the A548 and should result in a successful project. Whereas the land that the applicant wants, desires and has described in their heads of terms as land for the applicants "enjoyment" will cause irreparable ecological and economical damage.

I do have a few other concerns, which I will very briefly mention -

The rights that the applicant are seeking are entirely disproportionate to the verbal description of what they need to do at 06-097. They say they only need access for one person to walk across one time, on one day to guide the trenchless cable underground. So I have to ask why they feel the need to place any restrictions on plot 06-097 at all, let alone full cable rights?

When the applicant was asked about funding for the project at one of the hearings, the applicant basically answered that BP would be paying. My concern with this is that, to my knowledge, there is no law that can force a third party to pay Mona's bills for them, even a majority shareholder. Therefore unless BP supplies in writing that they agree to that and accept full financial responsibility and liability for the entire project and all associated cost arising, including court costs, compensation etc etc, then the Secretary of state must refuse permission as Mona has clearly stated that they do not have the money to cover the project.

Due to the heavy-handed nature of the proposal, I have serious doubts as to whether it will have any positive effect on reducing co2 emissions. Draining a wetland will release thousands of tons of co2. Then take the haul road- levelling a mountain so they can put it through a crusher, transport it in hundreds of trucks to a processing plant, transport again to site, spread it out as a road, cut down a forest to make fence posts to protect the road, fire up a steel plant to make the fence wire to go on the posts.....i can go on but I won't. when you stack all those emissions against the tiny lifespan estimated to be 35 years. I really don't believe the project would stand up to scrutiny on the co2 issue.

The surveying for the project is entirely inadequate, by there own paperwork the two trees at 06-097 are likely bat roosts, and yet no bat monitoring was done in the area, they also missed the purpose-built bat roost in the area that the council holds the key for.

There was no adequate consultation prior to the application. I only became aware of the project 2 days before the deadline for the first response of AP's to the EXA. I had looked at all posted notices, but the only land pictured and mentioned was 06-100. I am also very restricted in my ability to take part in the exa process as I have no internet signal or connection, so I apologise if I am talking about things that have already been dealt with, but I have no ability to download updated documents.

I do not seem to be on the compensation list and neither is the owner of plot 06-097, as far as I can see.

Your sincerely

Rebecca Face

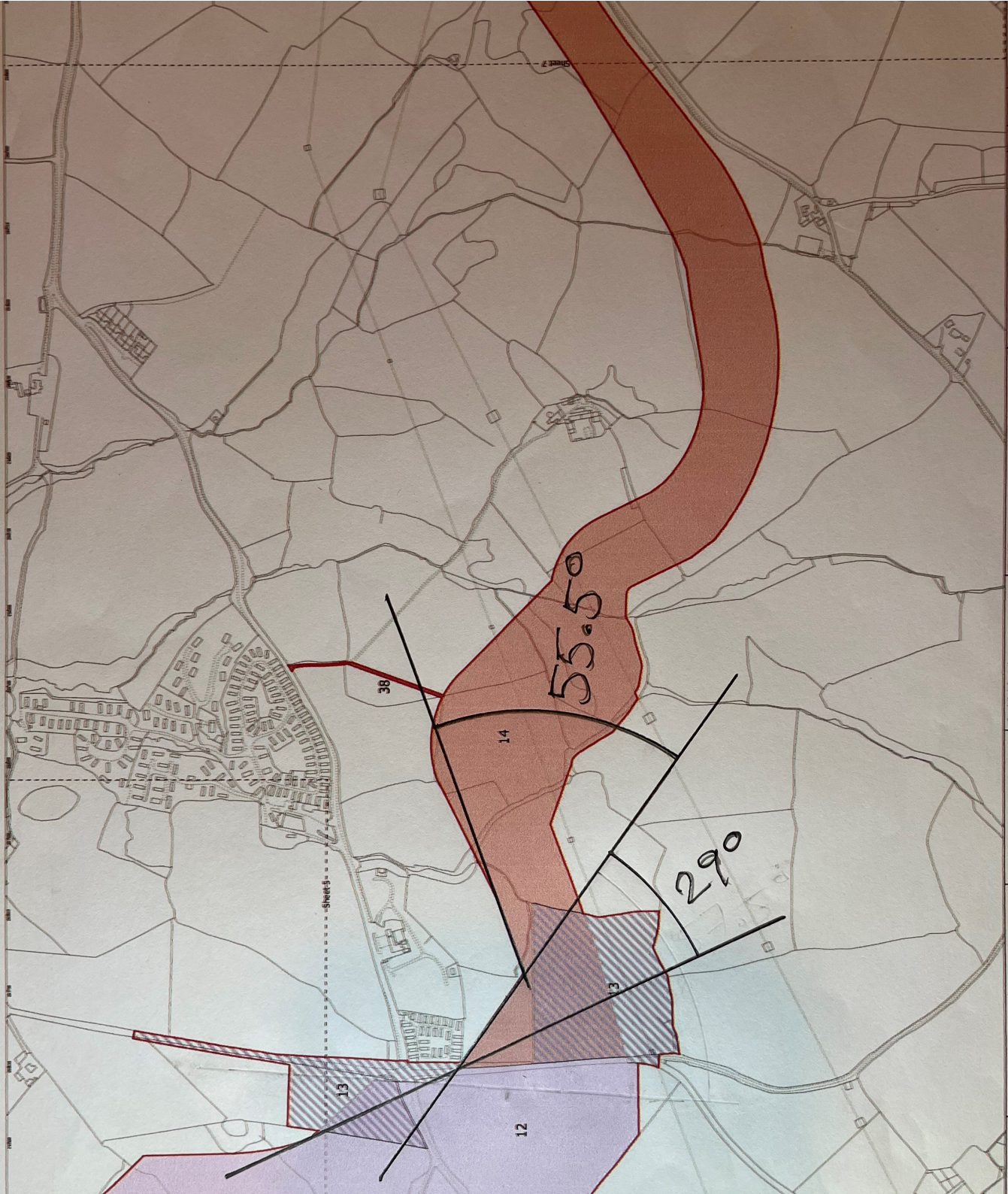
Figure 1



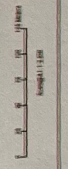
rule 2.



Structure 3



Drawing Title  
WORKS PLAN - ONSHORE  
SHEET 6



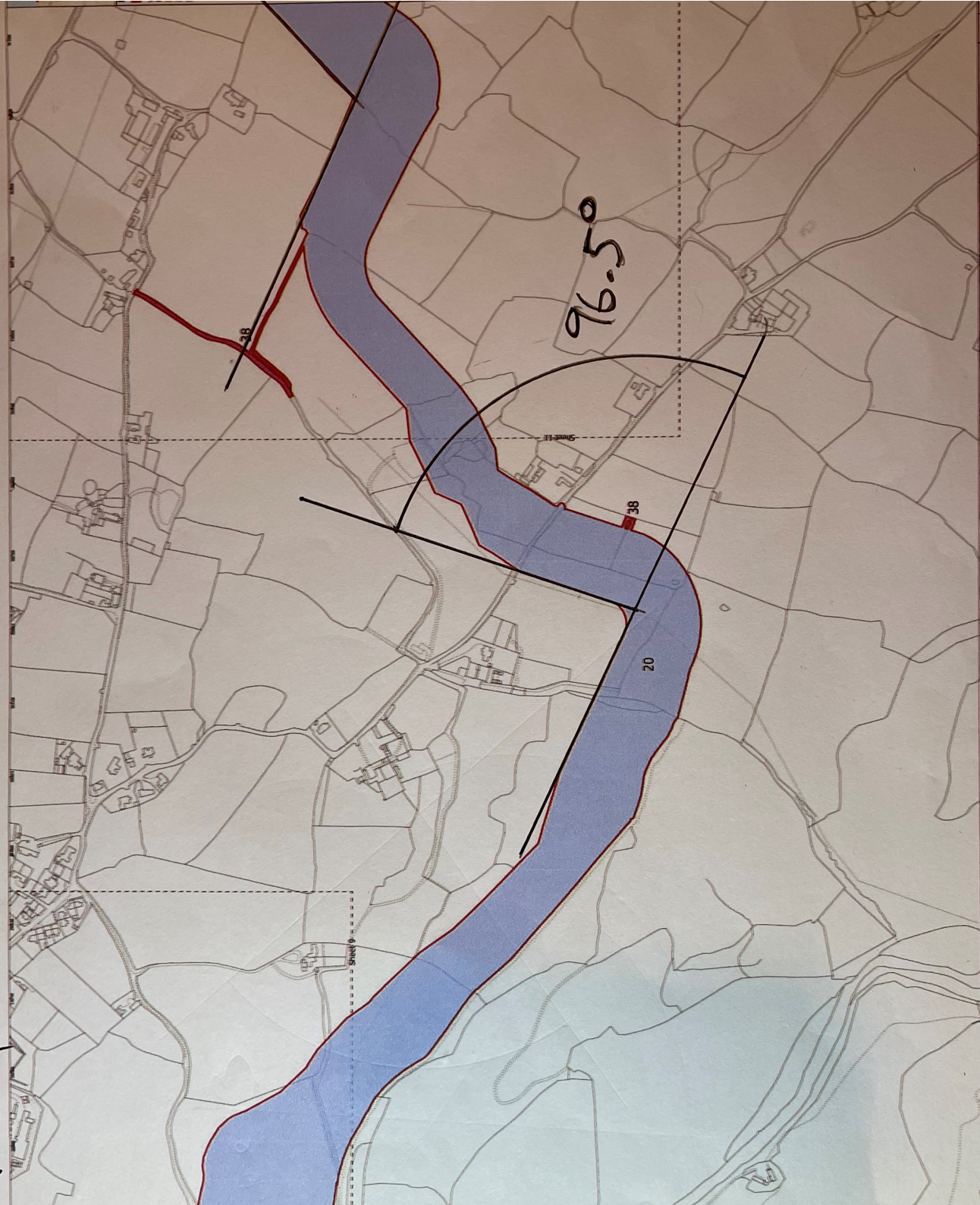
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DATE: 06/10/14  
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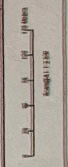
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| VER | DATE     | DETAILS            |
|-----|----------|--------------------|
| 01  | 09/01/23 | Updated Work Plans |
| 02  | 08/02/23 | Updated Work Plans |

ure 4



Drawing Title  
WORKS PLAN - ONSHORE  
SHEET 10



Geospatial Information  
Datum: OSGB 1936  
Projection: British National Grid

Sheet No. 10/10  
Plot No. 10

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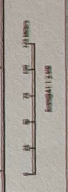
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| 01  | 28/01/23 | Updated Work Plans | JAH |
| 02  | 08/02/23 | Updated Work Plans | JAH |



area 5



Drawing Title:  
WORKS PLAN - ONSHORE  
SHEET 7



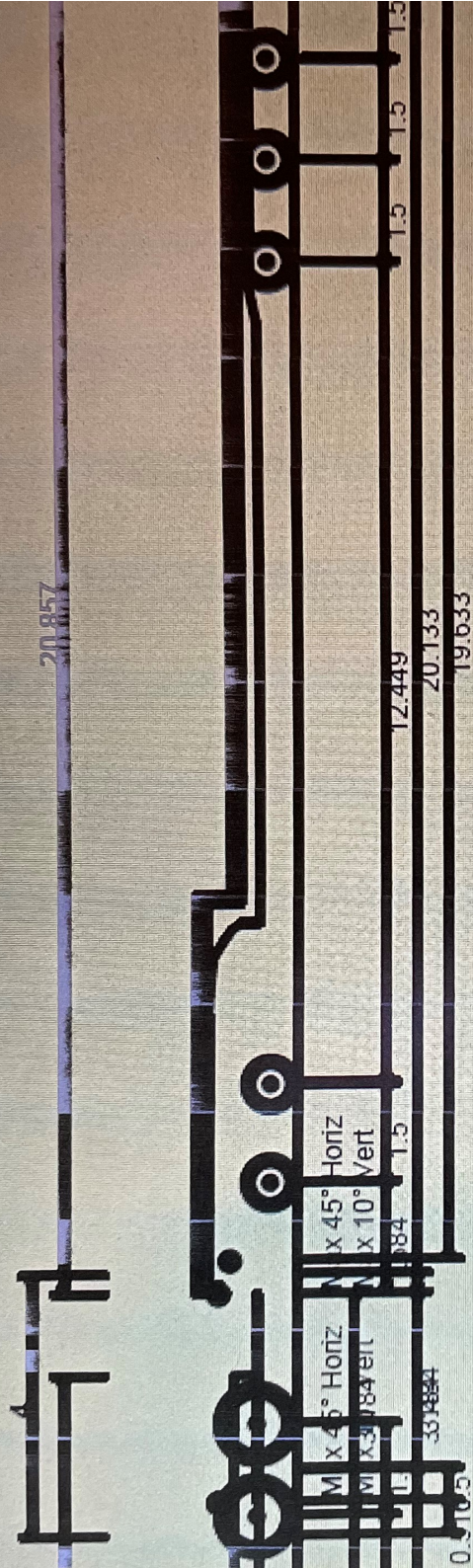
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Revision: [Illegible]

| VER | DATE     | DETAILS            |
|-----|----------|--------------------|
| 01  | 20/01/23 | Updated Work Plans |
| 02  | 04/03/23 | Updated Work Plans |

# END



heavy load mover 4.5m wide load bed

- Length 28.816m
- Height 4.500m
- Wheel Diameter 2.818m
- Wheel Center Distance 0.567m
- Wheel Center Distance 2.500m
- Turning time 6.00s
- Turning Radius 18.862m

6

## Extent of public highway