



## **White Cross Public Consultation sessions May 2024 – suggested areas of the proposal to raise with the applicant’s team**

### Context:

At this time the applicant has not provided any new or additional information in respect of their proposal. They have indicated to the LPA that this requested information will be submitted to them by July 1<sup>st</sup> 2024. However this date does not imply that it will immediately be available to the public.

So, this round of consultations is a PR/marketing exercise to tick the box and help them identify areas that will cause the applicant most trouble going forward.

We are sure that LB residents will be only too happy to help them in this exercise!

The suggested areas are topics which the applicant has to date not provided either sufficient detail, disregarded or treated as of low impact.

### Suggested Areas:

#### 1. Alternative cable routes:

The applicant claims that in direct response to concerns raised by the local community, they have had two separate independent reviews of Chapter 4: Site Selection and Assessment of Alternatives completed.

These were:

- A 'cold eyes' external third-party technical review, which was conducted by an independent industry expert without any prior project knowledge.
- Independent legal review by in-house counsel from our retained project lawyers. The in-house counsel formally advised that the 'site selection process and treatment of alternative sites has been dealt with systematically and clearly'.

Raises three questions:

What were the terms of reference given to the authors of these reports?

How independent is the applicant's in house counsel?

Why are these documents not in the public domain?

#### 2. Cable route construction:

The applicant's April press release refers to "cable of 25cm diameter" being laid. Why this disingenuous description? Shouldn't the press and public be told all of the facts regarding the construction activities known so far?

Current detail in public domain indicates construction of haul roads cutting swathes through undeveloped countryside, permanent structures of cable link boxes, loss of mature trees and vegetation. Mitigation measures will take up to 15 years to provide benefit.

### 3. Key documents requested by LPA

The applicant has yet to provide:

- Lighting Impact Assessment (including assessment of the impacts from the construction phase)
- Flood Risk Assessment (to be updated)
- Geotechnical Investigation Interpretative Report
- Bentonite Management Plan
- Hydrogeological Risk Assessment

When will these be available? What will the consultation period be given that these are very technical documents?

### 4. Horizontal Directional Drill (HDD):

Horizontal Directional Drilling carries a high risk of being a pollution source within the sensitive landscape where it is proposed to be used.

How does the applicant intend to address:

- Natural England has identified a risk to natural groundwater migration from having large plastic ducts buried in areas with a high water table. This risk is highly likely to be considerably increased where large amounts of Bentonite have been used, as the natural waterways in the existing ground material surrounding the ducts will be effectively sealed.
- Any loss of pumped drilling mud into the surrounding formations introduces the risk of it finding its way to the surface. Whether in an SSSI, prestigious golf course, popular beach or major river, this would probably cause long-term or irreversible damage.
- Other considerations are the source of the fresh water, the final disposal of the drilling mud and contaminated arisings and the leakage of drilling mud into the sea when drilling towards it.

### 5. Final proposed route of the on land cable:

Applicant states that "Pre-construction we will prepare a full UXO Risk Mitigation strategy, specific to the final detailed route."

This appears to infer that the final detailed route is still not being put in the public domain – why?

### 6. Ecology Surveys

The applicants' response dated 18<sup>th</sup> March to the LPA's request for further surveys indicates a reluctance to do any further work after May 2024, particularly in respect of second full year of surveys as it would adversely impact their timelines. The applicant has stated the requirement for second year of surveys is a significant concern.

So what is driving their timelines – highest environmental protection of our landscape or least cost to them?

### 7. Wintering birds and high tourist season

When will these requested additional survey details be available?

- Wintering Bird Survey Report (Braunton Marsh and River Taw)
- Approach to Lapwing Mitigation (to be supplied as an Annex to the survey report)

How does the applicant intend to avoid construction activity impacting on both these key seasons?

### 8. Decommissioning:

Applicant is claiming further detail will be provided. Further to what?

No detail was provided by applicant who actively discounted this activity in submitted documents.