



Offshore Wind Farms

EAST ANGLIA ONE NORTH

PINS Ref: EN010077

and

EAST ANGLIA TWO

PINS Ref: EN010078

**SEAS comments on the APPLICANT'S
RESPONSE to**

**ExA WQ1s and WRITTEN
REPRESENTATIONS -**

Deadline 2 – 17 November 2020

SEAS (Suffolk Energy Action Solutions)

Unique Ref. No. EA1(N): 2002 4494

Unique Ref. No. EA2: 2002 4496



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**THORPENESS CLIFFS and CORALLINE CRAG
SEAS comments on the APPLICANT'S RESPONSE to
ExA WQ1s and WRITTEN REPRESENTATIONS**

Further to SEAS Written Representation on Thorpeness Cliffs and Coralline Crag (REP-329), we would like to respond to the Applicant's Deadline 1 Responses to ExA WQ1s and Written Representations as follows:

APPLICANTS RESPONSE to ExA WQ1 - 1.14.4 - CORALLINE CRAG

1.14.4 Interface with nuclear construction, operation and decommissioning at Sizewell Ltd. Are offshore works prospectively affecting the coralline crag sufficiently clearly described and controlled, given the protection to the Sizewell shore and to the nuclear sites afforded by it? If not, please indicate the additional analysis and actions required.

SEAS welcome the Applicant's commitment to use Horizontal Directional Drilling (HDD) and the introduction of a map showing a 'punch out area'¹ directing cables south of the Coralline Crag potentially avoiding and minimising disruption to the Crag, Thorpeness Cliffs and the Common.

However, it does not resolve the fact that no physical surveys have yet been conducted and without them there is no guarantee that HDD will be acceptable at Landfall.

In addition, we wish to flag paragraph 11 of Appendix C3 ², in which Natural England state "*Documentation and evidence presented for other offshore wind farm developments along the east coast of the UK has identified that 2 km horizontal directional drilling (HDD) is not viable. Please could more evidence be presented to support the viability of the proposal?*"

¹ https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-002599-ExAAS2D1V1EA1NOutlineLandfallConstructionMethodStatement_378408_1.pdf

² <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-002731-EN010078%20330917%20EA2%20Appendix%20C3%20-%20NE%20Comments%20to%20Draft%20Outline%20Landfall%20Construction%20Method%20Statement%20Deadline%201.pdf>



In the Outline Landfall Construction Method Statement (OLCMS) ³ the applicant states that “*Detailed onshore and offshore geotechnical investigations will be conducted at the Landfall*”.

As a matter of urgency, the Applicant should supply a timeline detailing when these investigations will commence. This list is taken from the OLCMS:

1. Offshore Investigations conducted offshore from a vessel:
 - Boreholes
 - Bathymetric survey
 - Geophysical survey
2. Onshore investigations at the landfall will include:
 - Boreholes
 - Hydrological monitoring
 - Trial Pits
 - Geotechnical, chemical and environmental laboratory testing
 - Cliff stability monitoring:

We assume these physical investigations will be conducted during the DCO examination otherwise it defeats the purpose of the Examination.

APPLICANTS RESPONSE to ExQ1 - 1.0.19 - LANDFALL

1.0.19 Site selection: Thorpeness landfall taken from Volume 2 – 1.0

Overarching, general and cross-topic questions⁴

The Applicant writes: An engineering feasibility study was undertaken to review landfall options in terms of construction and cost, including consideration of geology. The review and assessment of shoreline movement and stability, and the effects of coastal management plans over the next 50 years is presented within *Appendix 4.6 Coastal Processes and Landfall Site Selection* (APP-447).

³ https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-002599-ExAAS2D1V1EA1NOutlineLandfallConstructionMethodStatement_378408_1.pdf

⁴ https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-002691-ExAWQ1D1V102EA1NEA2ApplicantsResponsetoWQ1Volume210Overarchinggeneralandcross_378387_1.pdf

SEAS concerns detailed in section 4, page 40 of their Written Representation on Thorpeness Cliffs ⁵ still stand. With Climate Change accelerating at a pace that scientist worry will be irreversible,^{6, 7} resulting in sea level rises and more frequent storm surges the applicants survey cannot be taken seriously.

The recent high winds of 9 and 10 November 2020 saw a further cliff fall and the seasonal winter storms haven't even begun. Stormy high tides eat at the shore line leaving an overhang which inevitably collapses from sheer weight.

This photographic evidence is alarming.



Sandmartins at Thorpeness, Suffolk

Notwithstanding the erosion of the cliff, or perhaps because of it, the Sandmartins have found something super-soft to create their nests in at Thorpeness. [©Barry Hughes](#) ⁸ 18/07/2005

⁵ [https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-002779-DL1%20-%20SEAS%20\(Suffolk%20Energy%20Action%20Solutions\)%20Campaign%20Group.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-002779-DL1%20-%20SEAS%20(Suffolk%20Energy%20Action%20Solutions)%20Campaign%20Group.pdf)

⁶ <https://www.nytimes.com/2019/12/04/climate/climate-change-acceleration.html>

⁷ <https://climate.nasa.gov/faq/16/is-it-too-late-to-prevent-climate-change/>

⁸ <https://www.geograph.org.uk/photo/42939>



The Sandmartins nests are no longer there. © G Robertson 14/11/2020



No matter what defences are installed in this particular part of the shoreline, the sea reclaims them at a rapid rate. © G Robertson 14/11/2020



Coastal Erosion at Thorpeness, Suffolk

This wartime "pillbox" was at least 50ft from the cliff edge when I first saw it in 1997. No doubt it was even farther inland in the 1940s. [©Barry Hughes](#)⁹ 18/07/2005



The pillbox is reclaimed by the sea. © G Robertson 14/11/2020

⁹ <https://www.geograph.org.uk/photo/42936>

This small collection of photographs only serves to highlight the findings of previous studies that concluded that coastal erosion has continued to have a serious impact in this area.

Combine this devastation with the future risks associated with climate change and one can only conclude that the Thorpeness Cliffs are dangerous and not suited to cable landfall.

SEAS therefore take issue with the Applicant's comments:

“Section 4.8.3 of Chapter 4 (APP-052) explains how the onshore landfall area was refined and the rationale for selecting an area north of Thorpeness, summarised as follows:

- The landfall can accommodate onshore cable requirements for both the Projects; “*

UNDERGROUND CABLE EXPOSURE & HISTORIC ORDANANCE

Mr Richard Reeves wrote in his Written Representation ¹⁰ of two alarmingly dangerous scenarios that the Applicant has not responded to:

- 1. “25th October 2018, when a major international communications cable, Concerto, currently undergrounded at the proposed SPR landfall site, was dangerously exposed more than two feet above beach-level, for an extensive length of its passage across Thorpeness Point beach toward the provenly unstable cliffs SPR is proposing to HDD. On investigation I was informed by the cable company that the Concerto cable had originally been laid at a depth of 3 metres below beach level / seabed. The cause of the exposure had been a simple, regularly occurring spring tide coinciding with a tidal surge along the east Suffolk coast, an event not uncommon in Autumn / Winter. As one example of inadequate research and study, the whole incident illustrates the*

¹⁰ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-002782-DL1%20-%20Richard%20Reeves.pdf>



unprofessional approach that has characterised every aspect of SPR's approach to this project. Both the fact that SPR was completely unaware of the existence of a major cable at the proposed landfall site, and the fact that Suffolk coastal tides and weather can, and do, move massive quantities of shingle and sand without warning clearly illustrates a complete lack of understanding of local conditions. Furthermore, the proposed cable corridor route itself crosses and re-crosses, and may adversely affect, damage, and potentially destroy the Concerto heavy communications cable, since SPR has to date also failed to identify the cable's subsequent inland route."

2. "On 5th January 2019 a cache of unexploded, historic ordnance was discovered in the vicinity of the landfall site. Both this location, and the surroundings of the cable route in the vicinity have historic military use as firing ranges and weapons usage from both World Wars."

It is apparent that the Applicant needs to urgently complete their physical investigations to correctly assess landfall and to include how they intend to mitigate or deal with any future encounter of cable exposure and historical ordnance.

As Mr Reeves states: "*Suffolk coastal tides and weather can, and do, move massive quantities of shingle and sand without warning*". That along with eroding cliffs do not make a good Landfall site.

G. Robertson

17.11.2020