



EAST ANGLIA ONE NORTH OFFSHORE WINDFARM EAST ANGLIA TWO OFFSHORE WINDFARM DEADLINE 8

Beach View Holiday Park - Prepared by Nicholas Thorp 24th March 2021
East Anglia One North: IP 20024928 / East Anglia Two: IP 20024929

Outline Landfall Construction Method Statement

Requirements 13: Landfall Construction Method Statement (LCMS)

On inspection of SPRs submission of Outline Landfall Construction Method Statement Document (Reference: ExA.AS-2.D6.V2). We reiterate our concerns to the Planning Inspectorate examining team (EA1N & EA2) and to East Suffolk Council (district authority Coastal Management) & Suffolk County Council.

Scottish Power's proposals for cable landing and HDD cables under the cliff could have a serious impact on the subsea Coralline Crag which provides immeasurable protection to the subsea sand bar, the beach and the cliffs at Thorpeness on this stretch of fragile coastline. We are only considered an Interested Party however as our business is located just north of the proposed landing zone, we have to submit concerns that SPR have misled themselves and others in these examinations:

In **Environmental Statement - 6.3.4.6 Appendix 4.6 Coastal Processes and Landfall Site Selection** - .83 SPR suggest the selected landing zone is in a location where cliff retreat is 'very low'

...Over much of the local study frontage the retreat of the cliffs is very low at present. Greater erosion has been shown to occur to the south of Thorpeness."

It is our understanding from being on the ground the opposite is true - The area to the south of Thorpeness benefits from a wider beach. The beach at the North of Thorpeness, immediately at the southern end of the landing zone features some of the narrowest stretch of beach and this is metres from where the cables are due to land

SPRs Outline Landfall Construction Method Statement 3.19 / 20 states:

"The HDD design will be undertaken post consent and will rely on inputs from onshore and offshore pre-construction site investigations as well as information from the detailed cable system design."

How can SPR make assumptions on the method or suitability when they haven't even carried out Geotechnical investigations?

This was highlighted previously by National England (**Point 2** - Appendix C3 Natural England's Comments to the Draft Outline Landfall Construction Method Statement).

Section 7 Cliff Stability

We are concerned the applicant has failed to fully explore obvious issues arising from construction processes. SPR attempt to provide a basic reassurance that their drilling method will cause minimal vibration and that they will monitor vibration levels throughout. This is pretty much useless if the cliff is destabilised by drilling

How is minimal vibration qualified & quantified when drilling under a soft sand cliff?

There has been in our opinion a clear failure to carry out due diligence and this is extremely concerning as we know the cliffs here are fragile and unstable.

Potential to exacerbate cliff falls at Thorpeness, triggering man made erosion of the cliffs.

There are regular small cliff falls due to natural movement, weather and environment. However, a more significant cliff fall in January 2017 resulted in the fatality of a walker on the beach in the exact cable landfall location.

We would argue even minimal vibrations could trigger cliff falls (*we submit weblink 'Appendix 1', a video posted on social media by the Norfolk Coast Guard capturing a cliff fall at Gorleston*). These cliffs in Norfolk are identical soft, sheer sand cliffs. It is thought this cliff fall was caused by high winds.

We submit 'Appendix 2' a photo of the warning signs erected at Thorpeness beach shortly after the cliff fall fatality in 2017.

SPR have confirmed they plan to HDD cables under the cliffs. HDD will cause both vibration and movement, SPR's use of 'desk based' assessments to consider and select this location is completely inappropriate. Even the most basic assessments surely should have ruled out this whole stretch of coastline where the cliffs are sheer sand cliffs, over 5 metres in height (both apply in this location). The fact that the applicant has proceeded with this location is ill-conceived and seemingly without expert structural engineering appraisal (these are all to come later post DCO).

In our opinion there is no question the HDD works will threaten the stability and integrity of the cliff and this whole section of coastline. We are not engineers but believe that the location and approach drilling under sheer faced, sand cliffs are totally incompatible. Further a potential requirement to pile close to the cliffs has not been explored and this could add more stresses on the stability of the sand cliff.

- **We would question why East Suffolk Council have not been more robust against these proposals which in terms of Coastal Management represent a preventable erosion threat, effectively a disaster in the making.**
- **We provide this evidence to be added to the many other issues identified in these examinations. SPRs chosen cable landing zone is dangerous and unsuitable. SPRs DCOs are inadequate, a danger to the sustainability of the coastal cliffs, the wider coastal landscape and even human life.**
- **We would also ask examiners to seek more details from SPR as to whether piling will be required into and around the cliffs, if so to seek clarification of the exact locations. We know piling can cause significant vibrations over a large distance, as we witnessed from Galloper and Greater Gabbard projects closer to Sizewell, both projects carried out piling over numerous days where ground vibrations could be felt many metres away. If piling is required close to the cliffs, why have locations and details not been included in the Landfall Construction Method Statement?**

See attached Appendices 1&2

Appendix

1: Cliff Fall captured in Gorleston Norfolk <https://www.facebook.com/watch/?v=1574321129421108> (7th March 2021 - HM Coast Guard Gorleston)

2: Image of signs erected on Thorpeness Beach March 2021 (Suffolk CC & East Suffolk Council – Coastal Management)



Beach View Holiday Park – Sizewell Common, Leiston, Suffolk, IP16 4TU

Tel: 01728 830724 email: enquiries@beachviewholidaypark.co.uk website: www.beachviewholidaypark.co.uk

Partners Mr. D. M. Thorp and Mrs. S. G. Thorp