

From: [REDACTED]
To: [East Anglia Two](#)
Subject: Responses to Secretary of State
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From

Richard Reeves, AP EA1N AFP 133 / IP 2002765

Onshore Siting, Design and Construction.

I would like to put forward the following points for urgent consideration by the Secretary of State, which I sincerely believe make further consideration of the Applicant's entire proposed project extremely difficult, if not impossible adequately to assess within the timeframe of the examination process. I am putting them forward now because time constraints and connection difficulties made it impossible to include them in my oral submissions at the hearings.

In terms of the choice of the specific proposed landfall site and cable corridor, the Applicant claimed, at great length, that there was a "compelling" case that the beach and clifftop site north of Thorpeness Point was the only viable choice of location at which to bring cabling ashore. Indeed, as laid down most unequivocally in environmental statements, by the AONB organisation itself, and in all governmental guidelines, this would need to be proven in order to justify any use whatsoever of AONB territory.

It was gratifying, if at first surprising, therefore, that in the pre-amble to explaining the choice of Landfall site the Applicant identified multiple alternative sites that had been considered, namely at Bawdsey / Bramford; Thames estuary; the Lowestoft area and inland from there; all extensive areas of land and seaboard comprising multiple viable brownfield sites, both for landfall and cable corridor routing.

Given the existence of these viable sites, identified by the Applicant's own officers, what then could be the "compelling" case for the choice of a nationally and internationally highly significant AONB for the massive-scale industrialisation proposed by the Applicant? In every example, the Applicant's answer was that at all of the viable sites apart from Thorpeness a longer cable-route would be required, which would be more costly and less convenient for the Applicant. No other reason was presented. Quite bluntly, the reason given by the Applicant itself, the "compelling" reason for industrialisation of an AONB, was that it would be cheaper and easier. Cheaper and easier only for the Applicant. "Compelling" therefore, only to the Applicant.

That the Applicant should believe that economic convenience to themselves should strike anyone else as "compelling" is almost breath-taking in its naïveté and bespeaks a woeful lack of professional judgement on the part of the Applicant. On assessing the case for the justification of site selection I would therefore like to submit that, even in the Applicant's own words, the proposed project has demonstrably failed to satisfy the paramount of the three tests for even the most minor building on, or industrialisation of, an AONB, namely that no alternative site is available. Since the Applicant itself has made it clear that this is not the case, can there be any reason at all for the Inspectorate to continue to consider the current proposed landfall site and cable corridor?

As was heard with general surprise during the course of the hearings, the Applicant's negligence in having conducted no prior surveys or examination of the landfall site and proposed cable corridor route is exacerbated by future plans. To the near disbelief of all attending not of the Applicant's party, surveying work will not be completed until approximately 6 months after the closure of the hearings, putting the Inspectorate in the position of having to deliberate on these issues without even the benefit of the relevant information.

General surprise turned to palpable shock when the representative of the Applicant specifically briefed to comment on the engineering plans for the proposed works disclosed that the process

of HDD, on which the Applicant has relied as the chief driver of potential environmental mitigation throughout the whole consultation and examination process thus far, presenting it at every meeting, on every occasion, and in all its literature and online material as a process to which the Applicant is fully committed, is merely one of several possible means of cable laying the Applicant is considering. One, furthermore, that the Applicant will be unable to assess the viability of prior to the surveys which will post-date the examination process. And indeed, one that the Applicant will not even be involved in, as the drilling and engineering process itself would be outsourced.

Effectively, the Applicant is asking for consent without divulging, or even knowing, what may be consented to. Surely this extraordinarily unprepared and unprofessional approach to such a major proposed undertaking can only leave the Inspectorate in the position of being unable, through no fault of its own, to complete its examination process. For this reason, and in concert with the Applicant comprehensively failing, by its own admission, to satisfy the conditions required for any use of AONB territory, I respectfully ask that the Inspectorate call a halt to proceedings, and advise the Applicant that key basic research and preparation, key operational and engineering decisions, and compliance with environmental regulations must be completed prior to attempting to bring the proposed project before the Planning Inspectorate again at a later point in time.

With thanks for your consideration of these points.

Yours sincerely

Richard Reeves

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