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To: [East Anglia Two](#)
Subject: Richard Reeves, Affected Person EA1N AFP 133 / Interested Party IP 2002765
Date: 02 November 2020 19:09:04

Submission from

Richard Reeves, Affected Person EA1N AFP 133 / Interested Party IP 2002765

With reference to:

Application by East Anglia ONE North Ltd for East Anglia ONE North Offshore Wind Farm
Application by East Anglia TWO Ltd for East Anglia TWO Offshore Wind Farm

The Examining Authorities' written questions and requests for information (ExQs1) Issued on 12 October 2020

Questions:

1.0.19, / 1.2.91 / 1.7.5. / 7.9. SCC 1 2 / 1.11.4. / 1.11.6.

In this submission I would like to expand, with further detail, on a major part of my initial RR from Jan 2019, on the unsuitability of the proposed landfall site at Thorpeness Cliffs.

I would like to start by asking, as a matter of urgency, what actual surveys, if any, has SPR itself completed on east Suffolk coastal erosion, and specifically the stability of the cliffs at the proposed landfall point? To date, it seems that only desk-based assessments have been referred to; some are ten years out of date, others 15 years (Black and Veatch, 2005 / Brooks, S.M., 2010)? Without an urgent survey in order to establish whether the shoreline and cliff conditions are suitable for Horizontal Directional Drilling, the situation is that most critical aspect of the whole project in terms of its actual physical feasibility is a complete unknown. More delinquent even than this glaring omission, it is understood that the Applicant will be leaving it up to an outsourced contractor, post DCO, to determine this fundamental building block of the project. How can this be thought to be acceptable, and what contingency for an alternative landfall site does the Applicant have in place should HDD prove not to be a viable?

Overwhelmingly, there is also a considerable problem with assessing and understanding recent coastal erosion as the works undertaken by ESC to stabilise the beach with gabions and geo-bags may well have masked, and altered, the natural processes in the immediate area and some indefinable distance beyond. This is particularly the case as both these forms of defence appear to have failed in short periods of time. Whilst a survey of recent local coastal erosion may pick up some trends, surely the above works will make interpretation questionable/unreliable. Further, a short time period impact may reflect an abnormal situation that will not be a true reflection of future coastal processes.

Additionally, is it not extremely questionable whether any study will reliably inform everyone of future erosion/accretion over periods of a century or more. It is clear all advice on SZC states reliable prediction beyond the next few decades is not feasible and it purely a 'most likely' assessment of how things will develop. SPR evidently has chosen a predicted 'conservative' 100-year retreat line for locating the landfall distance from the current coastline. Given the likely minimal cost, in relation to the whole project, of extending that further inland would it not be sensible to move it substantially further inland?

Question 1.11.2.

Please review in connection with attached photographs of dangerously exposed cabling. The coastline is influenced every now and again by currently unexplainable events which radically alter the coastal process regime. I happened to be present at one of these events, on 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, and event not uncommon in Autumn / Winter.

As one example of inadequate research and study, the whole incident illustrates the 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.

Additional

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. Dated photograph attached.

With thanks
Richard Reeves






