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Subject: Written Representation by Fiona Gilmore EA1N 20024391/EA2 20024393
Date: 30 November 2021 23:58:20

RE : Response to the Secretary of State : Letter 2 November 2021

The Secretary of State
Department for Business, Energy and Industrial Strategy
1 Victoria Street
London SW1H 0ET

Invitation from Secretary of State to comment on EA1N and EA2 as stated in Letter of 2 November 2021

To: The Secretary of State (BEIS) The Rt Hon Mr Kwasi Kwarteng MP

Dear Sir

We thank you for inviting comment on the question of flooding with regard to climate change caused or exacerbated by the above project. We note that you have asked the Environment Agency to consider and report back to you on all relevant flood events.

“Look. See around you. Flood plains. Flat land. Fragile land. Rare habitats. Precious lowland heathland. And this is where they want to build the largest wind energy infrastructure hub in the UK. Not on a brownfield site. Here. You must be joking.” (New resident to Suffolk Coast and Heaths : Ecologist : 2021)

“ Wrong environment. Wrong plans.” (Developer : 2021)

SASES has already written to you and to the Environment Agency concerning flooding events in and around the proposed substation site in Friston.

1. FLOODING

I would like to endorse SASES written submissions and their most recent paper submitted on 30 November 2021, relating in particular to the significant risk associated with construction works for this substation site at Friston. Numerous photos have been supplied bearing testament to the recent floods and the damage to the village and dwellings. We believe that the possibilities for the disturbance of flood plains, around and south of landfall have not been explored by the Applicant.

SEAS has written about the wider area in its latest submission. The River Hundred's coastal floodplain in the north of Aldeburgh has not been assessed for its vulnerability to the trenching of its wetlands, nor have the downstream possibilities for silting, flooding and shifting drainage caused by the permanent removal of wetland and wet woodland in the valley of the River Hundred, been adequately explored. Aldeburgh Marshes are vulnerable to overtopping events which also threaten the dwellings of the town.

In 2013 a tidal surge caused the River Alde to burst its banks at Snape, causing flooding at surrounding houses and closing The Crown pub for six months due to flood damage.

This region is typified by its numerous river estuaries. The natural beauty around these vast dome skies, rare lowland heathland, marshes and estuaries has inspired composers, painters and poets from Britten to Hambling, from Crabbe to Constable. Nature based

tourism has brought visitors flocking to Aldeburgh and Thorpeness for the bird life, rambling, fishing, cycling, swimming, and for the tranquillity; yet, this same wilderness and lowland heathland has an exceptional fragility and vulnerability about it. These river estuaries can become water funnelling channels during storms and tidal surges. The existential threat from tidal surges and monsoon rains is a constant. Thorpeness crumbling cliffs, which are composed of Norfolk Crag, sand in essence, are further evidence of the immense fragility. The Coralline Crag and unique far-reaching Aquifer network are vulnerable to long-term damage and contamination caused by drilling. We can compare this threat with that facing Dunwich in the 13th and 14th centuries. Dunwich sits on sandy cliffs whose sides have been continually cut away at their bases, causing them to collapse. Over the centuries this coastal erosion has destroyed the Roman settlement, Saxon city and medieval port. The town was hit by a succession of storms in the 13th and 14th centuries and is now largely below the sea. The local community around Aldeburgh and surrounding villages is working ceaselessly through organisations, such as the Alde & Ore Estuary Trust to strengthen our defences against the natural threats and to make sure that we don't have another Atlantis. The community is doing everything possible to protect a much loved, fragile coast and heathland.

2. WRONG ENVIRONMENT: BIODIVERSITY THREAT

It continues to defy belief that ScottishPower and National Grid could have seriously considered this region for planning their mega energy infrastructure hub. We said at the outset that these plans were conceived by careless executives and consultants, remunerated for coming up with the lowest cost solution.

The NSIP system is clearly not fit for purpose. These plans should have been halted at the earliest CION stage of investigation. It should never have come to this. How much heartache and sickness has been caused by the cloud hanging over the community. We have lost one notable campaigner, Chris Wheeler and we know how tirelessly he worked to present better alternative solutions. For Chris and for future generations, we are determined to oppose these plans and to present the evidence which calls into question whether these examinations have been undermined from the outset, through "sharp practice" (SEAS 30 November 2022 ; submission paper 2).

The UK has such little lowland heathland remaining and 5% of it is here at the Sandlings and the largest patch in the UK is at Thorpeness. As cable trenches gouge out 32m wide corridors, Priority species and other wildlife will be displaced. The red deers' grazing areas near Thorpeness will be lost. River Hundred otter and water vole will disappear as the River is dammed. Nightingale and turtle dove will abandon Fitches Lane ancient hedgerows where children have walked to school for hundreds of years.

In the pursuit of green energy, we destroy Nature and our wildlife. Needlessly. The new Environment Bill suggests that we should be aiming for net gains, not net losses of Priority species.

Our Priority species were not seen by ScottishPower. If one conducts surveys at the wrong time of year, in the wrong place it is not surprising that you fail to notice the River Hundred valley is brimming with over 870 species, and notably four Priority species - water vole, otter, bat and great crested newt. An inconvenient truth.

Our claim that the River Hundred valley is a wet woodland was disputed by ScottishPower. Our evidence including the sighting of Himalayan Balsam was swept aside. An inconvenient truth.

As campaigners stood at Friston's St Mary the Virgin, on Friday afternoon, looking towards the designated site, just 20 meters from where the construction site will abut Church Road, I imagined what it could become. Close your eyes and imagine the monolithic concrete buildings, the steel towers and hear the low constant hum. If this

Application gains consent, it will rip the heart out of Friston. Let's be upfront and admit it. Are villagers going to be sacrificed?

3. FASTER, GREENER SOLUTION. WIN/WIN/WIN. OR RISK ENVIRONMENTAL CATASTROPHE.

There is of course a better solution. SEAS has consistently campaigned for a brownfield site and a modular offshore grid (MOG). We do not promote National Grid solutions because we cannot trust an organisation who is responsible for designing a master plan, which is ten years overdue and who is at the same time a developer making profit out of outdated, radial Grid Connections. Why depend on National Grid MPIs which may not be ready in time? The news headlines this afternoon states that National Grid and ScottishPower are to pay £158million in penalty charges due to delays in delivering subsea power cables. Are these trusted developers or do they obfuscate? There are other specialist developers overseas who are nimble and have been more forthcoming and receptive to questions asked by James Cartlidge MP and by this author when they both individually interviewed in the same week in 2020 the same CEO.

Let us be bold and make the step change to a well-considered spatial strategy and make these projects the first OTNR Early Opportunity Pathfinder projects. Thus far, National Grid and ScottishPower have chosen not to opt in. The incentives and Anticipatory Investment scheme have yet to be presented. Recalcitrant developers may need some coaxing.

A 22 year old student, my nephew, described his feeling about this energy infrastructure onslaught.

“To disregard Nature is sad.
To disregard lives and livelihoods makes me despair for the future”.

This environmental catastrophe, because it is nothing less, has to be reassessed in the context of the cumulative impact of the panoply of substations and connectors.

Flood risk. Environmental long-term damage. Ecocide. The new Ecocide International Law is likely to be introduced within the next few years, in time to be used to challenge ScottishPower and National Grid for their negligence and long-term damage to protected areas and Priority species. Long-term disruption to the communities. Long-term damage to the landscapes and cultural heritage.

Cumulative impact was not fully assessed in the Examinations. ScottishPower was disingenuous and did not present the full collection of projects. Not once was ScottishPower upfront. ScottishPower did not once present the “hub” and explain the full implications of years of construction for Friston in the context of such a massive industrialisation programme.

Another inconvenient truth. An environmental catastrophe. Nothing less.

We have the power to stop this. Right now.

Face up to our responsibility and green aspirations. We appeal to the Secretary of State to halt these onshore plans. There is time. Our MP Dr. Therese Coffey has signalled a practical way forward. The proposal for a “split decision” can allow the BEIS/Ofgem team to step change, granting permission for the offshore wind farms, not giving consent to these ill-conceived onshore plans. Onshore and offshore solutions are merging as more integration starts to be managed offshore. The proposed brownfield site is located closer to

where the power is needed and to the shoreline thereby reducing onshore long term damage. Integrated offshore platforms can enable power from more than one wind farm to be merged at sea. Faster, greener solutions will be the way forward if the framework is in place for these projects and the others following on.

“It’s surely our responsibility to do everything within our power to create a planet that provides a home not just for us, but for all life on Earth.” Sir David Attenborough.

Best wishes
Fiona Gilmore
SEAS and a local resident

Sent from my iPad