

Burstall Parish Council

Written Representation Deadline 1:

Application by National Grid
Electricity Transmission (NGET) for
an Order Granting Development
Consent for the Norwich to Tilbury
Project

Submitted to: The Examining Authority, Planning
Inspectorate

Interested Party Reference Number: [REDACTED]

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Introduction

This report builds on our initial Relevant Representation that was submitted to register our interest in the Examination process. It provides the detail and policies to support our topics of concern. In our Relevant Representation, we raised four key topics:

1. A Strategic Approach to Undergrounding
2. Construction Disturbance and Mitigation
3. Permanent Visual Impact (Wirescape) and Mitigation
4. Security & Resilience of Critical National Infrastructure

Burstall Parish Council continues to **OBJECT** to the DCO Application by NGET in its current form, and we propose specific, feasible modifications to avoid, minimise, mitigate, and compensate for the impacts it would cause. However, we also assert that **parts of the Environmental Statement (ES) remain incomplete** and the Applicant must provide additional information to satisfy this shortcoming.

Whilst the 400kV Bramford Substation sits within the parish of Bramford, it is actually closer to the village of Burstall. The impacts of the proposal at the substation, and the proposed wirescape to the south of the substation through our parish, will be significant.

Open Hearing

In the Open Hearing on Tuesday 10th February 2026, Councillor William Petersen spoke about the Security and Resilience of Bramford Substation. Due to time constraints, that was a summary of a primary concern. This Written Representation provides details of the specific policy failures relating to that concern, as well as the details of our other three significant concerns. Councillor

Petersen is submitting a document relating specifically to his presentation at the hearing and this will also meet Deadline 1.

AI Statement

This report has been prepared by a mix of professional expertise and volunteer experience. Due to our proximity to Bramford Substation, we have been learning extensively about energy infrastructure and planning over the past three decades. We have a number of professional experts in our parish and network, including careers within security and resilience of Critical National Infrastructure, as well as Planning and Scrutiny.

AI was not used to draft this response but was used to review the completed draft for flow, accuracy, and gaps. We used Claude, Gemini, and DeepSeek to get a range of responses. To prevent AI bias, we told it this draft belonged to someone else and we had been tasked to review it. As a result, a few paragraphs were reordered for flow, suggested locations for CSE Compounds in Chapter 1 were added, and some of our listed policy failures were made clearer. AI also suggested the restructuring of the Summary chapter from a repeat of text to a clear table summarising the Policies and Failures in this report. Other suggestions were discarded, or manually double checked for accuracy first and then discarded as fantasy/made up.

Summary

This report is focused on our four key topics, as listed in the Introduction, and summarised in our Relevant Representation. We will not repeat that information here.

Each topic is explained in greater detail in the Chapters of this report. Within each Chapter we include the:

- Relevant Policies
- Current Proposal and Impacts
- Conflict and Policy Failures
- Proposed Solutions

This summary provides a simple reference table for the Inspectors that identifies the Policy, the Failure, and where the detail to support our assertion can be found in the report.

Policy Note: We understand that the timing of the DCO submission requires that the application be judged against the National Policy Statements (NPS) that came into effect January 2024, and therefore these are the policies we have used in this report. We are also aware that the Applicant is to provide a NPS tracker at Deadlines 1, 4 and 7 which sets out any relevant changes and modifications to the NPS, and we reserve the right to amend our submission accordingly.

Policy	Failure	Supporting Information
NPS EN-1 & EN-5 Mitigation Hierarchy	Chooses to compensate – lower down the hierarchy - for visual impact instead of avoid.	Chapter 1 – Failure 1
Electricity Act 1989 Section 9	Fails to develop and maintain an efficient and economical network.	Chapter 1 – Failure 2
Horlock Rules p10 and Rule 5 & 11	Fails to keep visual impacts to a minimum by proposing an increase in visual clutter around Bramford substation.	Chapter 1 – Failure 3
NPS EN-1 3.3.66	Duplication of works required increases cost to consumers, delivery timescales, and community and environmental impacts.	Chapter 1 – Failure 4
NPS EN-1 4.1.7	Disengages the presumption in favour of consent.	Chapter 4 – Failure 7
NPS EN-1 4.4.4	Proposed diversion route goes from one closed road to another closed road, with no impact assessment of the diverted traffic – ES is incomplete.	Chapter 2 – Failure 1
NPS EN-1 4.4.5	Fails to assess cumulative construction impact in conjunction with Bramford to Tilbury NSIP - ES is incomplete.	Chapter 2 – Failure 2
NPS EN-5 2.9.14-15	Fails to assess a reasonable alternative proposed in Section 1.4.	Chapter 1 – Failure 5
NPS EN-1 and EN-5	Fails to assess security and resilience risks.	Chapter 4 – Failure 1, 3, 4, 5, 6
The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 Schedule 4.2	Fails to assess a reasonable alternative proposed in Section 1.4.	Chapter 1 – Failure 5
	Fails to assess alternatives from a security risk perspective.	Chapter 4 – Failure 2

The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 Regulation 4	Fails to provide a complete ES – consent prohibited.	Chapter 1 – Failure 1, 3, 4, 5 Chapter 2 – Failure 1, 2 Chapter 4 – Failure 1, 2, 3, 4, 5
The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 Regulation 5, and Schedule 4 paragraphs 5 and 8	Fails to assess cumulative impacts of a reasonably foreseeable project – Brunfort BESS – ES is incomplete.	Chapter 4 – Failure 4
	Fails to assess risks from major accidents or disasters – ES is incomplete	Chapter 4 – Failure 5
National Risk Register 2025, National Protective Security Authority, and The Electricity System Restoration Standard (ESRS)	Fails to assess reasonable worst-case scenarios on the regional and national electricity network.	Chapter 4 – Failure 1
	Fails to conduct a Site-Specific Risk Assessment for major CNI projects.	Chapter 4 – Failure 3
Rochdale Envelope	Fails to assess the worst-case scenario.	Chapter 4 – Failure 8

1. A Strategic Approach to Undergrounding

1.1 Relevant Policy

Electricity Act 1989

Section 9 1 *It shall be the duty of an electricity distributor— (a) to develop and maintain an efficient, co-ordinated and economical system of electricity distribution;*

NPS EN-1

3.3.66 *The security and reliability of the UK’s current and future energy supply is highly dependent on having an electricity network which will enable new renewable electricity generation, storage, and interconnection infrastructure that our country needs to meet the rapid increase in electricity demand required to transition to net zero while maintaining energy security. The delivery of this important infrastructure also needs to balance cost to consumers, accelerated timelines for delivery and the minimisation of community and environmental impacts.*

4.2.11 *Applicants must apply the mitigation hierarchy and demonstrate that it has been applied.... Applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated...*

4.3.23 *The Secretary of State should be guided in considering alternative proposals by whether there is a realistic prospect of the alternative delivering the same infrastructure capacity (including energy security, climate change, and other environmental benefits) in the same timescale as the proposed development.*

Mitigation hierarchy: *A term to incorporate the avoid, reduce, mitigate, compensate process that applicants need to go through to protect the environment and biodiversity.*

The designation of Norwich to Tilbury as a CNP project is identified in paragraph 4.2.5

...For electricity grid infrastructure, all power lines in scope of EN-5 including network reinforcement and upgrade works, and associated infrastructure such as substations...

NPS EN-5

2.1.1 *As set out in Section 1.3, this NPS is additional to EN-1. Therefore, applicants and the Secretary of State should consider this NPS and EN-1 together. Applicants should show how their application meets the requirements in EN-1 and this NPS, applying the mitigation hierarchy, as well as any other legal and regulatory requirements. This includes the assessment principles as set out in Part 4 of EN-1, and the consideration of impacts as set out in Part 5 of EN-1....*

2.1.6 *The assessment principles outlined in Section 4 of EN-1 continue to apply to CNP infrastructure. Applicants must show how any likely significant negative effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy. Early application of the mitigation hierarchy is strongly encouraged, as is engagement with key stakeholders including SNCBs, both before and at the formal pre-application stage.*

2.9.14 *Where the nature or proposed route of an overhead line will likely result in particularly significant landscape and visual impacts, as would be assessed through landscape, seascape and visual impact assessment, the applicant should demonstrate that they have given due consideration to the costs and benefits of feasible alternatives to the overhead line. This could include – where appropriate – re-routing, underground or subsea cables and*

the feasibility e.g. in cost, engineering or environmental terms of these...

2.9.15 The ES should set out details of this consideration, including the applicant's rationale for eschewing feasible alternatives to the overhead line, and the mitigation cost-calculation methodology that this rationale may rely upon.

Mitigation hierarchy: *A term to incorporate the avoid, reduce, mitigate, compensate process that applicants need to go through to protect the environment and biodiversity.*

The Horlock Rules

The Horlock Rules are the industry-standard guidelines for substation siting, including extensions. They include rules that require NGET to keep environmental effects to a reasonable minimum and to avoid the prominence of structures on main viewpoints and prominent ridges or skylines.

Section 2, paragraph 10: *The purpose of each proposal for substation, sealing end compound or line entry development should be set out in a brief, and a range of system and siting options should be evaluated and documented as part of the selection of the preferred solution. In each case the effects of the overall development on the environment should be assessed, prior to a commitment to a particular site or design.*

Rule 5: *The proposals should keep the visual, noise and other environmental effects to a reasonably practicable minimum.*

Rule 11: *The inter-relationship between towers and substation structures and background and foreground features should be studied to reduce the prominence of structures from main viewpoints. Where practicable the exposure of terminal towers*

on prominent ridges should be minimised by siting towers against a background of trees rather than open skylines.

The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

Schedule 4 Paragraph 2: *A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.*

1.2 Current Proposal and Impacts

The current proposal south of Bramford substation requires a significant and complex change to existing infrastructure and the addition of new infrastructure. ES Chapter 4 includes the Project Description, and the application documents and Work Plans indicate:

- The removal of three 132kV overhead lattice style pylon lines and installation of new 132kV underground cable systems, including the PLD overhead line, PHB overhead line, and PCB overhead line;
- The creation of a new double-circuit 400kV overhead line of lattice style pylons, which would follow a similar path as the current 132kV pylons.
- Separate haul roads, access tracks, and work compounds for the conflicting needs of undergrounding cables, dismantling pylons, and erecting pylons along two different routes.

This proposal also requires two sets of environmental surveys and assessments and mitigation requirements.

It is important to note that the undergrounding of the 132kV lines and dismantling of the associated pylons is not a direct aim of this project. It is classed as associated development and listed under document 5.14 Details of Associated Development.

1.3 Conflict and Policy Failure

The current proposal represents a significant and undeniable doubling up of visual impact, works and access requirements, costs, and environmental disturbance, directly contradicting the established policy.

Failure 1: Under NPS EN-1 and EN-5 the mitigation hierarchy makes it clear that the priority is to AVOID impacts first. It is feasible to avoid the visual and environmental impacts at this location, however NGET have not done so. Instead, NGET choose to COMPENSATE for the impact by undergrounding a smaller line instead, which is further down the mitigation hierarchy.

Failure 2: The applicant's current proposal fails the efficient and economy requirement of Section 9 of the Electricity Act 1989. Paragraph 3.5.9 of ES Chapter 3 states that *“technical and cost factors were assessed in parallel with environmental considerations, including construction and delivery complexity, engineering feasibility and constraints....”* However, by choosing to underground a smaller 132kV line while simultaneously building a more intrusive 400kV overhead line the applicant is multiplying the construction and mitigation work required. It is creating two sets of environmental assessments, construction routes, work compounds, work schedules, and mitigation requirements, where realistically only one would suffice. Further, if the PCB, PHB, and PLD lines are all operationally sound, removing them is a luxury option that adds complexity and cost. This is not economical for the consumer, or efficient for delivering the benefits of the network reinforcement, and NGET fail to

comply with their duty under the Electricity Act.

Failure 3: Under the Horlock Rules, NGET are required to: consider the relationship between the towers and substation to reduce visual impact; to keep the impacts to a minimum; and to reduce the prominence of structures.

By erecting 400kV pylons around the Bramford substation, while only undergrounding the smaller 132kV pylon line, NGET are creating a net **increase** in visual clutter, prominence, and environmental impacts.

Failure 4: NPS EN-1 3.3.66 makes it clear that the delivery of infrastructure must balance cost to consumers, accelerated timelines for delivery and the minimisation of community and environmental impacts. As a CNP project the delivery of the reinforcement works are deemed as urgent.

The current proposal to double up work is contradictory to achieving this. Building extra and unnecessary construction routes into the proposal creates extra cost, increases delivery timelines, and increases community and environmental impacts.

Failure 5: Under The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 Schedule 4 Paragraph 2, NGET are required to assess the reasonable alternatives. The Alternatives section does not provide a comparison of our proposed option below, i.e. Underground the 132kV line + Build 400kV pylons versus Retain 132kV line + Underground 400kV line. This is a reasonable and technically feasible alternative, as set out in our Proposed Solution below, and so the applicant has failed to meet the requirement of the EIA Regulations and the ES is incomplete. This omission also fails to satisfy the requirements under paragraphs 2.9.14-15 of NPS EN-5.

1.4 Proposed Solution

Burstall Parish Council proposes that NGET strategically underground part of the new 400kV double circuit line south of Bramford Substation through Burstall parish, and retain the existing 132kV pylon line. This would require a single construction corridor, rather than multiple corridors.

We understand that this requires a Cable Sealing End (CSE) Compound at both the Substation and end of the underground section, however we strongly believe the land area needed for this approach is more reasonable than what is needed under the current proposal. Proposed locations for the CSE Compounds are:

- Location 1 - Bramford Substation End: Immediately south or south-west of the existing substation boundary as an additional extension to the current substation footprint. This keeps the visual impact within the existing industrialised area.
- Location 2 Option 1 – Underground to Pylon End: Around Hintlesham Fisheries to Buckle’s Bridge area. This is near existing woodland which provides natural screening for the lower-height of the compounds.
- Location 2 Option 2 (Preferred Option) - As a second option, the cable could continue to Notley Enterprise Park, where NGET propose a CSE Compound to underground the line already. This would eliminate the need for a CSE Compound here entirely as the underground cable would simply continue.

Further, while the cost of 400kV cable is higher than 132kV cable, the Applicant has not provided an analysis of the costs that would be avoided by retaining the 132kV cables as they are, including the savings of not duplicating the construction corridor. We ask that NGET make this assessment available. If they haven’t written one, then their decision-making process is flawed because they will

not have done everything possible in order to evaluate the environmental effects prior to committing to a particular design.

Spending millions of pounds to remove up to 30m tall pylons, just to spend millions of pounds to put up 50m pylons is inefficient.

While NGET frames the removal of the 132kV line as a benefit, the scale and impact of the larger 400kV line vastly outweighs the removal of the smaller line. The 132kV pylons already provide the baseline landscape environment. Strategic undergrounding would avoid the increasing the visual impact of the larger 50m pylons.

In Chapter 3 of the ES: Alternatives, NGET describes the Definition of ‘Reasonable Alternatives’ for the Project in paragraphs 3.2.25-27. Burstall Parish Council asserts that this alternative proposal satisfies all of those definitions. It would meet the network reinforcement need, it meets the development objectives for the project, it delivers equivalent infrastructure capacity within the same time frames; it is technically feasible; it supports the systems capacity into 2030; it complies with NGET’s statutory duties under the Electricity Act 1989; and it is consistent with and does not conflict with the relevant NPS and government policy.

By failing to produce a transparent cost-benefit analysis that compares the current proposal to our proposed alternative below the savings and environmental impacts of leaving the 132kV line as it is and undergrounding the new 400kV line, NGET have failed to demonstrate compliance with their duty to provide an efficient and economical system.

Rationale 1: This approach directly AVOIDS the primary visual impact – the introduction of a massive new wirescape. Removing a 132kV line only to replace it with a much larger 400kV line is a net increase in visual blight, not a reduction. It meets the higher up requirement of the mitigation hierarchy, rather

than the lower down one of compensation that NGET propose. 50m pylons introduce highly significant visual blight compared to lower profile CSE Compounds which can be more effectively screened.

Rationale 2: This strategy MINIMISES construction disruption. Work would be focused on a single construction corridor – the new 400kV underground cable - rather than three distinct construction corridors – building 400kV pylons, 132kV underground cable, dismantling the 132kV pylons. This is a more efficient and economic option for the consumer, and a less disruptive construction process for our community.

Rationale 3: This approach MINIMISES the cost of the project, and ultimately the cost borne by the consumer. While the costs of 400kV cable is more expensive than 132kV cable, retaining functional 132kV infrastructure and undergrounding the 400kV line provides better long-term value for the consumer (avoided visual blight, community relations, land disturbance) by concentrating on only one construction phase compared to three. Since the removal of the 132kV lines is listed as Associated Development within the project documents, and NGET are funding the project according to the Funding Statement, instead of removing functional equipment, the costs could be re-directed to undergrounding the 400kV line. No cost-benefit analysis has been supplied by NGET to demonstrate otherwise.

Rationale 4: By focusing work on one construction phase the timeline for project delivery becomes more efficient, as construction scheduling conflicts are avoided.

Rationale 5: By focusing on one workflow - undergrounding the 400kV pylons – this reduces the land take and disruption time which would be a major benefit on Thornbush Hall Farm, whose farming business faces significant, if not complete, disruption during the proposed construction works. Due to the nature of farming, the level of proposed

disruption could cause them to miss an entire season/year of crop production, and subsequently an entire year of business income. More detail can be found in the Godbold submission documents AS-053 to AS-060.

2. Construction Disturbance and Mitigation

2.1 Relevant Policy

4.4.1 *Energy infrastructure has the potential to impact on the health and well-being ('health') of the population. Access to energy is clearly beneficial to society and to our health as a whole. However, the construction of energy infrastructure and the production, distribution and use of energy may have negative impacts on some people's health.*

4.4.2 *The direct impacts on health may include*

- increased traffic
- air or water pollution
- dust, odour
- hazardous waste and substances
- noise
- exposure to radiation, and
- increases in pests

4.4.4 *As described in the relevant sections of this NPS and in the technology specific NPSs, where the proposed project has an effect on humans, the ES should assess these effects for each element of the project, identifying any potential adverse health impacts, and identifying measures to avoid, reduce or compensate for these impacts as appropriate.*

4.4.5 *The impacts of more than one development may affect people simultaneously, so the applicant should consider the cumulative impact on health in the ES where appropriate.*

2.2 Current Proposal and Impacts

2.2.1 *Incomplete Diversion Details and Missing Impact Assessment*

We note that traffic is not planned to come through the village centre of Burstall. Instead, it appears traffic would enter the working site off the A1071 before the Burstall junction, use haul roads on site, and cross Burstall Lane.

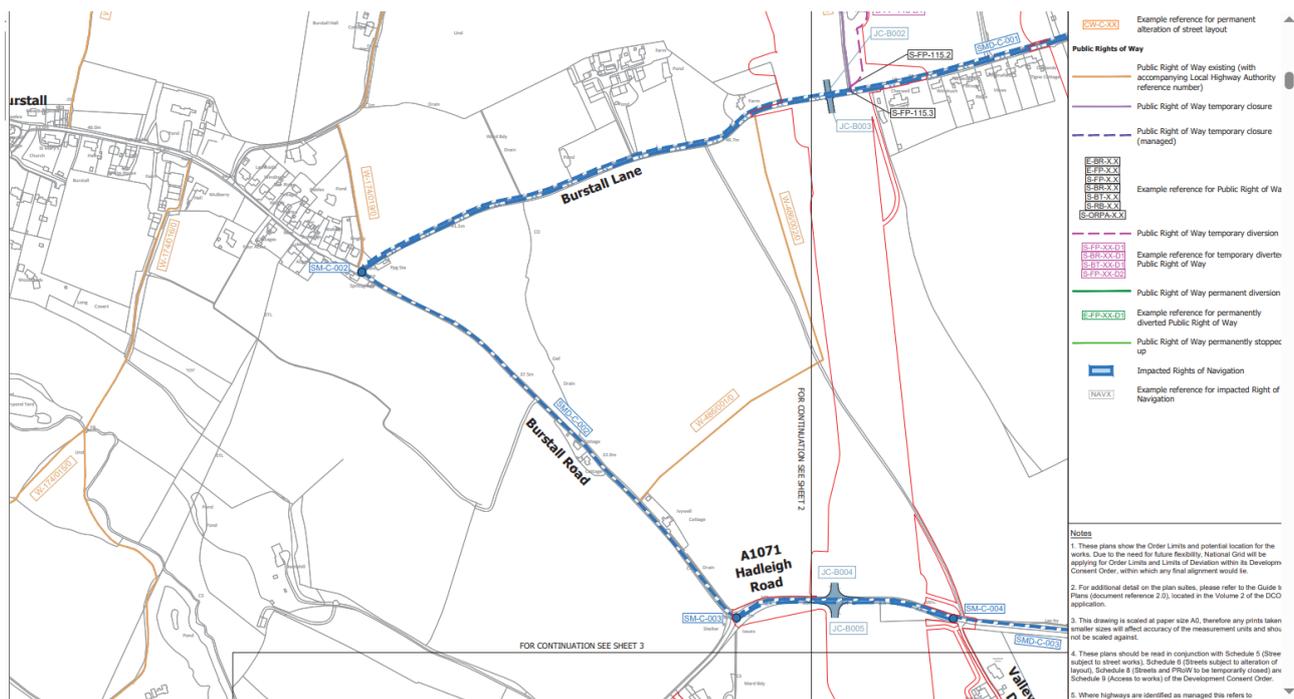
Temporary Traffic Regulation TR-C-004 of the draft DCO requests a speed limit restriction of 30mph along Burstall Lane. We also note the proposed temporary closure of Burstall Lane (SM-C-001 to SM-C-002), with traffic redirected via Burstall Road (SMD-C-002). We would support this temporary speed limit restriction, though we have concerns about the diversion route.

Temporary Traffic Regulation TR-C-006 of the draft DCO requests a speed limit restriction of 40mph for the A1071. We also note the proposed temporary closure of A1071 (SM-C-003 to SM-C-004), with traffic redirected via Burstall Road (SMD-C-002). We also support this temporary speed limit restriction, though we have concerns about the diversion route.

The diversion route SMD-C-002 appears to be a dead end diversion as both ends lead to a temporary road closure. We could see no confirmation that both roads would not be closed at the same time. There is no proposal of where the diverted northbound traffic from the A1071 should continue travel to. Nor is there a proposal of where the southbound traffic towards the A1071 should continue travel to.

Without a complete diversion route, and a suitable assessment, with swept path analysis for HGV traffic, it is impossible to identify the impacts and propose mitigation.

Image from document 2.5 Access, Rights of Way and Public Rights of Navigation Plans - Section C – Sheet 1:



2.2.2 Cumulative Construction Impact
 NGET propose to construct this project - Norwich to Tilbury - between 2026 and 2032.

They are also currently constructing the Bramford to Twinstead NSIP. This gained approval in 2024 and construction works are from early 2026 to 2029.

The order limits of Bramford to Twinstead and draft order limits of Norwich to Tilbury both pass through Burstall parish. This means there will be construction overlap of both NSIPs and subsequently a significant increase of accident and damage risk within the parish.

2.3 Conflict and Policy Failure

NPS EN-1 makes it clear that traffic can have an impact on health, and this must be assessed in the application. The incomplete diverted traffic route poses an issue, and the construction timeline of both NSIP projects clearly has an overlap.

Failure 1: Policy 4.4.4 clearly states that traffic impacts must be assessed. The

diverted northbound traffic along route SMD-C-002 has no onward traffic route defined in the application documents. Instead, it hits another temporary road closure – SM-C-001 to SM-C-002. NGET need to define the onward route for diverted northbound and southbound traffic and assess its suitability and impact for the likely traffic. Without this the ES is incomplete.

Failure 2: Policy 4.4.5 clearly states that cumulative impact of multiple projects must be assessed. The application documents do not include any cumulative impact assessment on Burstall parish from construction works of both the Bramford to Twinstead and Norwich to Tilbury NSIP projects. Without this the ES is incomplete.

2.4 Proposed Solutions

2.4.1 Traffic Impact Assessment

We require NGET to identify the full diversion route for northbound and southbound traffic for diversion SMD-C-002, and provide a detailed impact assessment.

Based on the temporary road closures, we can see two scenarios here. And both cause considerable concern for Burstall Parish Council.

1. **The road closures are not at the same time:** Traffic from the A1071, diverted northbound up Burstall Road, is intended to turn right on to Burstall Lane. But Burstall Lane is a single track country road, with limited passing places, and it leads to a weight restricted area. Any HGV would require verge access to turn/pass, creating damage in the process. This is a concern we are already in discussion with Suffolk Highways about.
2. **The road closures are at the same time:** Traffic from the A1071, diverted northbound up Burstall Road, hits another closed road – Burstall Lane. The shortest route from here is through Burstall village, through Burstallhill, right hand turn on to The Channel, right hand turn on to Tye Lane, and a right hand turn on to Lorraine Way towards Sproughton – a weight restricted area. Except for Lorraine Way, all these roads are single track country roads, with limited passing places, and prone to flood risk. Burstallhill is a Flood Risk Zone 3 area.

The impact assessment of the diverted traffic should identify:

- The current traffic baseline;
- The type and number of expected traffic to use the diversion;
- Analysis of the route for two-way traffic;
- Swept path analysis for HGV traffic.

It should be noted that when the Orwell Bridge is closed, or there is an incident on the A12/A14 the above routes are often gridlocked. We acknowledge that the route is not the official diversion in such incidents, however reality is that this is the route people and satnavs choose for all sizes of vehicles.

Rationale: Without a complete diversion route and detailed impact assessment the diverted traffic may have unintended impacts on unintended communities. A complete diversion route and impact assessment is needed to fully assess the impacts of the proposed temporary road closures and diversion.

2.4.2 Temporary Speed Limit on Burstall Road

In December 2025, Burstall Parish Council and Suffolk Highways conducted a traffic survey along Burstall Road, between the A1071 and Burstall Lane junctions. Result in Appendix A. The road has a speed limit of 60mph and there were still recorded instances of speeding. This is a narrow country road where it is difficult in places for vehicles of all sizes to safely pass each other. We ask that a temporary 30mph speed limit be added to the DCO for Burstall Road.

Rationale: The proposed temporary speed limit along Burstall Road would increase public road safety for vehicles of all sizes travelling along this diversion road, including any potential lost or misdirected construction traffic.

2.4.3 Assess Cumulative Construction Impact

We ask that NGET review the construction timelines for Burstall parish to identify if there is any overlap of works between the Bramford to Twinstead and Norwich to Tilbury NSIPs.

If an overlap is found, a cumulative impact assessment should be produced and submitted to the Examination, along with mitigation proposals.

It is important to note that construction impacts are not limited to traffic. Due to the proximity of Burstall to the Bramford Substation, we are also impacted by nighttime lighting, dust, and noise.

Rationale: This would complete the ES regarding cumulative construction impacts on Burstall parish.

3. Permanent Visual Impact (Wirescape) and Mitigation

We note that the Examining Authority has requested further details from the applicant regarding alternative pylon designs in document EV8-005. Due to the exposed profile and high elevation south of Bramford substation, we are interested in and await the response before we pursue this concern further.

4. Security & Resilience of Critical National Infrastructure

Preliminary Note 1: Burstall Parish Council includes two Councillors with a professional background in security and resilience, including Critical National Infrastructure. This section is not just from a position of general concern, but is informed by that relevant professional expertise. We are also aware that some of the most sensitive aspects of this issue may not be suitable for full public viewing, and we invite the Inspectors to consider a restricted or closed hearing for this topic, for which the two Councillors of Burstall Parish Council are willing to contribute their professional and local knowledge to.

Preliminary Note 2: We ask the Inspectors to read this section alongside the written submission on behalf of Ardleigh and Little Bromley Parish Councils, submitted by Simon Bell on 27th January 2026 – documents AS-064 and AS-065, which references the requirements of EN-1 and EN-5 to consider resilience and security. Their submission asserts that the cumulative impact of the proposed EACN energy hub would be difficult to comprehend on their rural location. This is not speculative. The reality is very real. The piecemeal industrialisation of Bramford is a direct result of the substation being here, and it is a very real possibility for the future of Ardleigh and Little Bromley.

4.1 Relevant Policy and Guidance

NPS EN-1

Security and resilience of our electricity network is central to national policy.

2.5.1 *Given the vital role of energy to economic prosperity and social wellbeing, it is important that our supplies of energy remain secure, reliable and affordable.*

2.6.1 *The government's wider objectives for energy infrastructure include contributing to*

sustainable development and ensuring that our energy infrastructure is safe.

3.2.1 *The government's objectives for the energy system are to ensure our supply of energy always remains secure, reliable....*

4.1.2 *The Energy White Paper and British Energy Security Strategy emphasises the importance of the government's net zero commitment and efforts to fight climate change, as well as the need to maintain a secure and reliable energy system.*

Under EN-1 Parts 4 and 5, the applicant is required to assess all relevant impacts – including effects on human health, safety, amenity, community wellbeing and emergency response capacity – and propose and assess mitigation for those risks. And to then weigh any residual effects in the planning balance. These impacts can be identified to impact at a national, regional, and local level.

Where a project has been determined as a critical national priority (CNP) – like this application - there is a presumption in favour of approval. However, EN-1 4.1.7 (our emphasis below) requires that where risks to public safety, emergency response capacity, or resilience of critical electricity infrastructure designated as CNP remain unassessed or insufficiently mitigated, these risks disengage the presumption in favour of consent.

4.1.7 *Where this NPS or the relevant technology specific NPSs require an applicant to mitigate a particular impact as far as possible, but the Secretary of State considers that there would still be residual adverse effects after the implementation of such mitigation measures, the Secretary of State should weigh those residual effects against the benefits of the proposed development. For projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional*

cases. **This presumption, however, does not apply to residual impacts which present an unacceptable risk to, or interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero. Further, the same exception applies to this presumption for residual impacts which present an unacceptable risk to, or unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk.**

Plainly speaking – regardless of its importance as a CNP project - if there is an unacceptable risk to public safety or defence, even after mitigation – the **presumption in favour is disengaged**. And if a risk has not been assessed, it cannot logically follow that there is no unacceptable risk.

NPS EN-5

EN-5 establishes at 1.1.11 that it requires applications to include information consistent with the guidance in EN-1, including 4.1.7.

1.1.11 *Applicants should ensure that their applications, and any accompanying supporting documents and information, are consistent with the instructions and guidance given to applicants in this NPS, EN-1 and any other NPSs that are relevant to the application in question.*

EN-5 continues to pivot itself around security of the energy network, and the identification of network reinforcement and substations – like Norwich to Tilbury and Bramford substation – as a CNP project. It even places security above visual impact.

2.4.3 *However, the Secretary of State should bear in mind that electricity networks infrastructure must in the first instance be safe and secure, and that the functional design constraints of safety and security may limit an applicant’s ability to influence the aesthetic appearance of that infrastructure.*

2.4.4 *While the above principles should govern the design of an electricity networks infrastructure application to the fullest possible extent – including in its avoidance and/or mitigation of potential adverse impacts (particularly those detailed in Sections 2.9 below) – the functional performance of the infrastructure in respect of security of supply and public and occupational safety must not thereby be threatened.*

The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

The Regulations 2017 governs the environmental assessment process for NSIPs in England and Wales. It clearly defines what must be assessed in the Environmental Statement, and that when the Statement is incomplete the Secretary of State must not grant development consent.

Regulation 4 Prohibition on granting consent without consideration of environmental information states:

4.—(1) *This regulation applies to—*

(a) applications for an order granting development consent for EIA development received by the Secretary of State; and

(b) subsequent applications for EIA development received by a relevant authority.

(2) Where this regulation applies, the Secretary of State or relevant authority (as the case may be) must not (in the case of the Secretary of State) make an order granting development consent or (in the case of the relevant authority) grant subsequent consent unless an EIA has been carried out in respect of that application.

Regulation 5 Environmental impact assessment process states:

5.—(1) *The environmental impact assessment (“the EIA”) is a process consisting of—*

(a) the preparation of an environmental statement or updated environmental statement, as appropriate, by the applicant;

(b) the carrying out of any consultation, publication and notification as required under these Regulations or, as necessary, any other enactment in respect of EIA development; and

(c) the steps that are required to be undertaken by the Secretary of State under regulation 21 or by the relevant authority under regulation 25, as appropriate.

(2) The EIA must identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the proposed development on the following factors—

(a) population and human health;

(b) biodiversity, with particular attention to species and habitats protected under any law that implemented Directive 92/43/EEC and Directive 2009/147/EC;

(c) land, soil, water, air and climate;

(d) material assets, cultural heritage and the landscape;

(e) the interaction between the factors referred to in sub-paragraphs (a) to (d).

(3) The effects referred to in paragraph (2) on the factors set out in that paragraph must include the operational effects of the proposed development, where the proposed development will have operational effects.

(4) The significant effects to be identified, described and assessed under paragraph (2) include, where relevant, the expected significant effects arising from the vulnerability of the proposed development to major accidents or disasters that are relevant to that development.

(5) The Secretary of State or relevant authority, as the case may be, must ensure that they have, or have access as necessary to, sufficient expertise to examine the

environmental statement or updated environmental statement, as appropriate.

Schedule 4 - Information for Inclusion in Environmental Statements – states:

5. A description of the likely significant effects of the development on the environment resulting from, inter alia—

(d) the risks to human health, cultural heritage or the environment (for example due to accidents or disasters);

(e) the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources;

The description of the likely significant effects on the factors specified in regulation 5(2) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development...'

8. A description of the expected significant adverse effects of the development on the environment deriving from the vulnerability of the development to risks of major accidents and/or disasters which are relevant to the project concerned. Relevant information available and obtained through risk assessments pursuant to assimilated law such as any law that implemented Directive 2012/18/EU of the European Parliament and of the Council or Council Directive 2009/71/Euratom or UK environmental assessments may be used for this purpose provided that the requirements of any law that implemented this Directive are met. Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the

preparedness for and proposed response to such emergencies.

NESO Obligations

NESO provides a list of events – ‘secured event’ - that the electricity network must be able to continue functioning under in the NETS Security and Quality of Supply Standards (NETS SQSS) v2.10. This is a minimum requirement of the most likely risks.

1.23 As described above, and illustrated in Figures 1.1, 1.2 and 1.3, there will be parts of the national electricity transmission system where more than one set of criteria apply. In such places the requirements of all relevant criteria must be met.

Secured Event A contingency which would be considered for the purposes of assessing system security and which must not result in the remaining national electricity transmission system being in breach of the security criteria. Secured events are individually specified throughout the text of this Standard. It is recognised that more onerous unsecured events may occur and additional operational measures within the requirements of the Grid Code may be utilised to maintain overall national electricity transmission system integrity.

National Risk Register 2025

The UK Government requires operators of Critical National Infrastructure (CNI) to use reasonable worst-case scenarios as defined in the National Risk Register when assessing risks. This sets out the worst plausible risks, rather than just the most likely. For energy infrastructure it includes the following scenarios:

- Conventional attack: electricity infrastructure
- Cyber attack: electricity infrastructure
- Failure of the National Electricity Transmission System (NETS)

- Accident and System Failure: Regional Failure of the Electricity Network
- Accidental fire or explosion at an onshore major hazard (COMAH) site (i.e. Battery Energy Storage Systems or BESS)

The Electricity System Restoration Standard (ESRS)

This new ESRS obligates NESO to have sufficient capability and arrangements in place to restore 100% of Great Britain’s electricity demand within five days. This should also be implemented regionally, with an interim target of 60% of regional demand to be restored within 24 hours. NESO must ensure that everything is in place to comply with this standard by no later than 31st December 2026.

National Protective Security Authority

The National Protective Security Authority (NPSA) requires owners of CNI to conduct rigorous risk assessments that include identifying reasonable worst-case scenarios to ensure resilience against risks such as terrorism, state threats, and natural hazards, and provides guidance on how to do this through its web pages and PDF documents such as its *Security Planning Guidance 2025*. The guidance it provides is designed to support compliance with legal obligations by ensuring security measures are proportionate to the worst-case risks.

It requires CNI owners to understand the maximum potential impact of an asset’s loss in a high-impact failure scenario, and to produce a Site-Specific Risk Assessment. Reasonable worst-case scenarios should cover scenarios from the National Risk Register along with any additional relevant hazards.

The NPSA emphasises reducing the concentration of assets to minimize the impact of an attack and avoid single points of

failure. This principle is central to their *Beyond the Perimeter* guidance, which aims to ensure that the destruction or compromise of a single location does not result in a catastrophic loss of capability.

Rochdale Envelope

The Rochdale Envelope principle is used to address finer details later on, often as part of discharging conditions. It allows developers some flexibility to account for things such as technology advancements, and supply chain issues. A fundamental principle of the Rochdale Envelope is that the assessment is carried out on the worst possible scenario before determination.

4.2 Current Proposal and Impacts

What Bramford Has Become

The N2T project does not pass through a normal substation. The Bramford Substation site has grown significantly over the last seven years. The Bramford Substation is a Critical National Infrastructure (CNI) site, reportedly handling up to 20% of the UK's electricity, though we have heard of figures up to 30% more recently. With generation in the region meeting 25-50% of UK demand at any given time depending on prevailing wind direction according to the Hiorn East Anglia Transmission Network Reinforcements report of September 2023.

The existing infrastructure at, adjoining, and connected into the site includes:

- The National Grid 400kV Transmission substation
- The UK Power Networks Distribution substation
- Two 400kV double circuit overhead lines from Sizewell B
- One 400kV double circuit overhead line from Norwich Substation

- Two 400kV double circuit overhead lines to Twinstead Substation – consented and under construction
- Five 132kV distribution power lines – one of these is via overhead pylons and goes underground north of the substation in Bramford Green
- Scottish Power EA1 and EA3 windfarm substations
- Two solar farms – 84.9MW
- Four approved Battery Energy Storage (BESS) sites – 517MW
- Three pre-application BESS sites – 1500MW publicly announced + 956MW on TEC Register

This site is a result of piecemeal planning through individually approved projects that have cumulatively gone unassessed in regards to security, resilience and continuity risk. It is accessed via a single-track dead-end country lane, with large scale BESS alongside it, and it is now a significant key node within the East of England transmission network.

The N2T Addition

NGET now propose this Norwich to Tilbury connection – a 400kV double circuit of overhead pylon lines with Bramford substation in the middle. And there are several more projects listed on the National Grid TEC Register with signed connection agreements, which are waiting for approval of this pylon project. It is not speculative that the approval of this project will facilitate additional projects – their connection dates are dependent on the approval of, and extra capacity provided by, this project. National Grid agreed connections to projects that have not even begun the planning process, into a grid system that does not yet have the capacity or planning permission to accommodate those projects. This proposed project will enable additional third-party developments, and additional cumulative security risks.

We note that the Scoping Opinion stated that a separate ES Chapter specifically for Major Accidents and Disasters was not needed. This was done on the premise that the effects

could be incorporated into other Chapters. For example, flood risks could be dealt with within the flood risk chapter. The Inspectorate lists a few other examples, but to be clear, the Inspectorate does not state that other Major Accidents and Disasters not listed are scoped out – just that they do not need a standalone chapter. This means that major accidents and disasters relating to security and resilience risks of concentrated, cumulative, and critical infrastructure still needed to be included, but in a different chapter. Given the significant impacts it would have on human wellbeing, we expected to find the information there. It was not.

The Risks

Open-source material from the Head of MI6, Chief of Defence Staff, and senior government ministers clearly highlights a persistent raised threat across Europe and in the UK, which cannot be ignored. This threat is not just cyber, it is also physical. It is also not hypothetical. Russia has systematically targeted Ukraine's energy infrastructure. On 3rd January 2026, Berlin suffered a domestic sabotage attack on above ground cable infrastructure causing widespread blackouts lasting several days, including to hospitals and schools. Unexplained and hostile drone activity over critical infrastructure sites has increased markedly across the UK and Europe.

In March 2025, a transformer fault at the NGET North Hyde substation – a fault that was first identified in 2018 and was left unrepaired – caused a fire that destroyed three supergrid transformers and shut down all terminals at the UK's busiest airport – Heathrow - for twelve hours, disrupting over 1300 flights. Transformers take a long time to make and the full repair is expected to take years, putting strain on other parts of the network in the meantime.

The difference between Heathrow and Bramford is that Bramford carries a material proportion of electricity for the East of

England, London, and South East - a far wider area than one airport.

The Bramford site already forms a huge wirescape on the landscape. The site contains over 18 high-voltage pylons concentrated on 30 acres of elevated ground and is clearly visible from a wide area, including Ipswich – a town of 150,000 people three miles to the east.

Chapter 3 – Alternatives of the ES 3.4.4 states *'Bramford was identified as a strategic connection point due to its position within the existing network, its ability to provide necessary system connectivity, and its role in maintaining network resilience and compliance with NETS SQSS requirements.'* This is the only reference we could find to security and resilience compliance. However, this assumes normal operating conditions and secured events (risks) listed in NETS SQSS. There are no other references to security or resilience related incidents within the documentation.

We appreciate that the addition of this project enhances resilience from major accidents and disasters in one respect – if an incident were to occur on the overhead line or at other key points then the remaining lines would continue to provide supply. Much like when a spider web loses one anchor thread, the web remains functional.

However, we raise the issue that the cumulative concentration of energy infrastructure and transmission reliance at Bramford substation, with the significant co-location of BESS facilities surrounding the Bramford site and the low probability but high impact risk of thermal runaway, introduces a distinct and unacceptable risk that goes beyond normal operating grid security. It has become a single point of failure.

To be clear, the site is accessed by a single track country lane – Bullen Lane – with only one way in and the same way out. There are limited passing places for emergency vehicles, no on site or nearby mains water

supply, and no waste water mains sewer system. And an extraordinary amount of connected infrastructure relies on the continuity of Bramford substation.

In addition to the existing BESS projects at Bramford, one future project is a BESS site of 1500MW – the largest in Europe – which is planned for the southern side of Bramford substation. This is not a speculative development. It is a named project – Brunfort BESS; it has an owner – Alcemi Ltd; it has a Land Option Agreement; it has a Connection Agreement with National Grid; it has a public website; it has been through pre-planning with the Local Planning Authority; and it is arranging public consultation having notified Burstall Parish Council of its intent. It is a reasonably foreseeable project. Taken together, the BESS projects connecting directly into and surrounding this site would amount to over 2962MW of capacity – and up to 5925MWh of energy – involving more than 1500 lithium-ion battery containers.

In the planning process for assessing these ‘local’ developments through the LPA we understand it is a requirement for developers and decision makers to assess ALL risks - including the risk to surrounding infrastructure. In our experience, this has not been the case, despite raising the omissions. Developers and decision makers have only ever considered a single battery unit (i.e. container or cabinet) fire and a limited assessment of risks to the natural environment. Not a plausible multi-container fire. Nor the risk to built infrastructure on contiguous land such as Bramford substation or the high concentration of pylons.

In a system where proposals are assessed and determined in isolation and by their individual merits, it is impossible to determine whether the risk thresholds have incrementally increased across projects to an unacceptable level on the CNI. This piecemeal system - as has built up surrounding the Bramford substation - leads to an accumulation of unassessed and

unmitigated risk. This is no longer just a substation and some pylons. It is an extraordinary concentration of regionally and nationally dependant energy infrastructure. And it has been assembled with no holistic security or resilience assessment having ever been conducted. For CNI infrastructure this is a cumulative risk that cannot be ignored.

Furthermore, concern is raised regarding the land interests of these additional third-party developments. These projects are often sold over and over again. Sometimes immediately after planning consent is given. Transferability of that ownership is unrestricted over time. Assets are broken up, sold, and moved around within Limited company structures, creating and dissolving them over time. Tracing ownership becomes impossible and exposes the land to eventual ownership by parties whose long-term interests may not align with UK national resilience.

As an example, we have reported wide area lighting being left on overnight at the EA1 and EA3 site in December – a violation of the approved DCO – which we are still trying to resolve because no one appears to be accountable. If the authorities can’t find out who is responsible for something as simple as turning the lights off at night, how can anyone have faith there is any traceability of site ownership? These developments are built on land directly bordering Bramford substation and along the length of its only single access road. This land is strategically located next to CNI infrastructure – Bramford substation - and it is a key node in the electricity supply to the East of England, London, and the South East.

The NPSA makes it clear that resilience must be designed in from the outset. It cannot be retrofitted. This can be achieved by avoiding the concentration of assets, opting for discrete and dispersed infrastructure instead. With infrastructure hidden from view where possible. Any CNI design should avoid a highly concentrated mass of pylons and other infrastructure on ground which is elevated and visible from a large population area.

There is no evidence in the application documents that this principle has been applied to the Bramford site at any stage of the project's design process.

In line with NPSA guidance and our firsthand experiences, the CNI industries we have worked in appear to take infrastructure resilience much more seriously, designed in from the outset, with all either favouring a dispersed design to avoid a single point of failure, and/or by having synchronous alternative back ups in place.

We are not asking the Inspectors to question only whether this proposed project is acceptable in isolation, but whether it is acceptable given the cumulative risk environment it is connecting into and would further enable, given that no adequate assessments of that cumulative risk have been made by NGET, or anyone.

Simply put – if we continue to concentrate assets at Bramford substation, what happens if a major accident or disaster at Bramford substation forces widespread shutdown for a prolonged period of time?

4.3 Conflict with Policy Requirements

Note: We appreciate that this is likely to be a sensitive topic, but amongst an Examination Library that includes references to other Confidential and Redacted documents, there remains **nothing** related to risk regarding security, resilience, or major accidents and disasters. On this absence alone it is reasonable to assume that even Confidential or Redacted documents have not been provided to the Examining Authority and Secretary of State.

There are eight policy failures we have identified relating to security and resilience. Each of them is enough to refuse consent. Together they represent a wider failure of the project to properly assess risk.

Failure 1: NESO NETS SQSS gives details of risks that must be considered when designing the onshore transmission network. This standard defines “Secured Events” for which contingencies must be planned in when designing the transmission system. NGET state in one sentence that choosing Bramford satisfies the NETS SQSS requirements. The standard typically focuses on the loss of a single busbar or double circuit. However, the standard makes clear that it is a minimum requirement. It assumes normal operating or minimum failure scenarios.

The NRR and NPSA require CNI risk assessment to be done on the basis of Reasonable Worst Case Scenarios. These are not just the most likely – such as in the NETS SQSS standard - but severe and plausible possibilities. The NRR lists several scenarios, and the application does not address any of them. A major accident or disaster at Bramford substation, considering the concentration of assets, could result in a prolonged and widespread power outage affecting millions of people and critical services like hospitals, as well as having wider costs to the economy, including increased constraint payments to energy generators such as Sizewell or the EA1 and EA3 windfarms. There is no assessment of a prolonged or catastrophic failure of the Bramford substation itself, from any risk source. There is no answer to the question of what happens to the local, regional, or national electricity supply – in line with The Electricity System Restoration Standard (ESRS) - if Bramford goes offline for weeks or months in any of the scenarios listed for electricity infrastructure.

Failure 2: NPSA guidance is clear – organisations managing CNI must minimise single points of failure and avoid concentrating assets in a single location. This is exactly what has happened at Bramford substation through a piecemeal consenting process. This project intends to further concentrate assets at Bramford, which is contrary to this principle. Within Chapter 3 –

Alternatives – the applicant states ‘*Bramford was identified as a strategic connection point due to its position within the existing network, its ability to provide necessary system connectivity, and its role in maintaining network resilience and compliance with NETS SQSS requirements.*’ There appears to be no consideration of alternative proposals through the lens of a dispersed network with security and resilience risk in mind. The cost of constructing alternatives seems to be the prevailing consideration. There is no assessment of the cost in the event of a security and resilience risk event at Bramford substation, and Chapter 3 – Alternatives is incomplete in the scope of its assessment.

Failure 3: NPSA guidance requires a Site-Specific Risk Assessment for major CNI projects. This requirement has not been met. The application contains no site-specific security assessment, and no assessment of physical resilience. There is no attempt to identify, let alone quantify and assess the risks created by the concentration of infrastructure at Bramford.

Failure 4: The Infrastructure Planning (Environmental Impact Assessment) Regulations Regulation 5, and Schedule 4 paragraphs 5 and 8 requires developers to consider the cumulative effect of other developments in the Environmental Statement. Other developments include those already built, projects already consented, projects already in the planning system, and projects that are reasonably foreseeable. The Brunfort BESS – a 1500MW BESS expected to connect into Bramford substation and sit adjacent to its southern boundary is a reasonably foreseeable project. However, it cannot connect into the network now because the capacity does not exist. Its connection is dependent on the approval of this application. However, it is not listed within the Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments. As the Norwich to Tilbury project is being oversized explicitly to accommodate developments like Brunfort

BESS, the applicant cannot claim ignorance of its development, and it must account for the cumulative effects of that development in the ES.

Failure 5: The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 Regulation 5, and Schedule 4 paragraphs 5 and 8 identifies the considerations that must be assessed in the Environmental Statement. Included within that are significant effects on ‘*population and human health*’, and ‘*material assets*’. It also explicitly states the requirement of considering effects of the ‘*vulnerability of the proposed development to major accidents or disasters that are relevant to that development*’ including the ‘*direct... indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects.*’

The effects of a **major accident or disaster** at Bramford substation, a key energy hub in the East of England transmission network, would undeniably be significant, including to the extent of the plausible worst-case scenarios outlined in the National Risk Register 2025. However, absolutely none of these risks have been included within the documentation, and so the ES is incomplete.

Where the ES is incomplete, Regulation 4 expressly prohibits the Secretary of State from granting development consent. This is not a planning balance or presumption in favour issue, it is a clear prohibition.

Failure 6: EN-1 Parts 4 and 5 require that impacts be assessed, mitigation proposed, and the residual effects considered in the planning balance. Due to failures 1-4 above, the ES is incomplete. This means it is impossible to determine what residual risks remain, and the planning balance cannot begin.

Failure 7: The presumption in favour of consent under EN-1 4.1.7 does not apply where residual impacts present an

unacceptable risk to public safety or defence. The exceptionally high concentration of energy infrastructure at the Bramford site, and the importance of the substation within the regional and national transmission network, already makes it a single point of failure. Such concentrations of infrastructure are precisely the targets that the NPSA and NRR seek to address because they present a significant risk to public safety and/or defence in the event of a major accident or disaster. That risk extends both to the wider area as a loss of electricity supply, and to the neighbouring rural villages who would be in the immediate hazard area. The proposed project tips that risk even further, and the oversizing of the proposal invites an even greater concentration of environmental risk into the area.

When a proposal such as Norwich to Tilbury is put forward for determination, which seeks to further concentrate energy infrastructure and increase exposure to third-party risks, those risks cannot go on ignored. A CNP infrastructure application that does not assess major accidents and disasters, does not quantify cumulative exposure to and from third-party risks, and does not track those risks over time across ownership changes, cannot credibly assert that the associated risk to public safety or defence is controlled, negligible or adequately mitigated.

Failure 8: A fundamental principle of the Rochdale Envelope is that the assessment is conducted on the worst possible scenario before determination. Therefore, the final construction is either the worst case or better. However, here the worst-case scenario has not even been assessed, and so the Rochdale Envelope principle cannot be relied upon to overcome these failures.

4.4 Proposed Solutions

Burstall Parish Council does not oppose the principle of grid reinforcement. Our objection to this project, as submitted in its current form, is that it poses grave risks to the security

and resilience of the wider energy network, communities, and economy.

This project is being pushed forward by the applicant under the pretence of need and speed as a CNP, but without the risk assessments and safeguards that the law demands of CNP.

In its current form the application should be refused. The Inspectors do not have the information needed to come to a different conclusion because the ES is incomplete.

To provide the Inspectors with relevant information for them to make an informed decision, we ask the Examining Authority to require the following:

1. The applicant must address the failures identified in this Chapter.
2. The National Protective Security Agency be invited to participate as a consultee.
3. A Planning Inspectorate site visit to the Bramford substation, encompassing all existing, approved and proposed developments, with the specific intention of viewing the scale of concentration of energy infrastructure.
4. A full cumulative resilience, continuity and security review of the Bramford site, including connected sites adjoining it, conducted to NPSA standards and including Reasonable Worst-Case Scenarios in the NRR. Any recommendations as a result of the review should be implemented as part of the DCO.
5. A review of dispersed and alternative design options to include their merits towards designing security in, and the associated costs of doing so vs not doing so in the event of NRR risk events. For example, underground HVDC cables (3 x 2GW trenches) have added protection being underground, and a dispersed route provides further protection.
6. A single point of accountability for the Bramford site to be established. This could be through the Health and Safety Executive, NPSA, NESO, Ofgem, a designated CNI

authority, or another appropriate body. They would be responsible for the cumulative design, risk management and emergency planning of all infrastructure on and adjoining the site. Without a single point of accountability for the cumulative safety and security of the overall Bramford site, it is impossible for the Secretary of State to be satisfied that the risks to public health and defence, as required by EN-1 4.1.7 have been adequately assessed and can be managed in the future.

7. A moratorium on the further consenting of development at or adjoining the Bramford site, through any planning process, until a cumulative review in point 4 has been completed and its recommendations fully actioned on and implemented. This could be implemented via a condition restricting NGET from allowing third-party connections into Bramford Substation. There is a clear precedent for this approach, as a BESS moratorium was issued by NESO in Scotland in December 2025 to allow improved strategic planning of energy installations.

Conclusion

Burstall Parish Council concludes that the Norwich to Tilbury project, in its current form, fails to satisfy multiple core requirements of national policy. While improved connectivity is a stated aim, further concentration of assets at Bramford substation creates an unacceptable risk to public safety and the resilience of the wider electricity network. There are alternative ways to achieve the aim, without as much risk.

Overhead lines may be the starting point for visual design, but security is the core foundation. And undergrounding the lines is one way of dispersing the security risk.

NGET argue that the cost to the consumer of these alternatives is unacceptably high. What about the cost to the consumer and the wider UK economy, and the risk to security and resilience of our electricity grid if Bramford Substation were to experience a widespread and prolonged failure?

We are deeply concerned that the rush towards 2030 targets – particularly for CNP infrastructure - is creating strategic planning errors and holistic risk oversights.

We see all developers at Bramford putting their eggs in one basket, with no one being responsible for the basket. Including the entity handing out the invites. If Bramford fails – for whatever reason – the consequences will not just be on our little village.

Under Regulation 4 of the EIA Regulations 2017, the Secretary of State is prohibited from granting consent where the Environmental Statement is incomplete. We have demonstrated across multiple chapters of this representation that the Environmental Statement remains incomplete.

Appendix A: Road Traffic Survey Result

Burstall Road - December 2025

Working together to **build a positive legacy** for Suffolk

Type of Survey	Speed, Volume, and classification Survey		
Project Reference	A4888	Easting	610602
Client	Private Survey	Northing	244039
Site location	Burstall Road Sproughton	Start Date of Survey Period	05/12/2025
		End Date of Survey Period	18/12/2025
Comments			

Speed Limit	60mph
Road Number	C726



DO NOT CHANGE THE STRUCTURE OF THE SPREADSHEET (i.e. add or delete rows/columns, modify formulas, etc.)

Site No. A4888
BURSTALL ROAD - SPROUGHTON

Lat/Lng. 52.0547 1.07034
Channel: Southbound

Speed Report (Speed Limit 60 Mph)
Week Begin: 05 December 2025

	Total Volume	85th Percentile	Mean Average	Standard Deviation	Bin 1 <30Mph	Bin 2 30-<35	Bin 3 35-<40	Bin 4 40-<45	Bin 5 45-<50	Bin 6 50-<55	Bin 7 55-<60	Bin 8 60-<65	Bin 9 65-<70	Bin 10 70-<75	Bin 11 75-<80	Bin 12 80-<85	Bin 13 =>85
Fri 5 Dec	775	41	35	6	205	237	202	83	32	10	3	3	0	0	0	0	0
Sat 6 Dec	684	42	36	6	117	211	211	100	21	19	4	1	0	0	0	0	0
Sun 7 Dec	503	43	37	6	72	136	159	97	32	5	1	1	0	0	0	0	0
Mon 8 Dec	871	42	36	6	178	257	258	120	37	13	6	2	0	0	0	0	0
Tue 9 Dec	988	41	35	6	280	287	236	123	40	17	3	1	1	0	0	0	0
Wed 10 Dec	943	41	35	6	244	277	255	103	38	18	6	1	1	0	0	0	0
Thu 11 Dec	1027	41	35	6	328	306	216	110	42	16	6	3	0	0	0	0	0
5 Day Ave.	921	41	35	6	247	273	233	108	38	15	5	2	0	0	0	0	0
7 Day Ave.	827	42	36	6	203	245	220	105	34	14	4	2	0	0	0	0	0

Site No. A4888
BURSTALL ROAD - SPROUGHTON

Lat/Lng. 52.0547 1.07034
Channel: Northbound

Speed Report (Speed Limit 60 Mph)
Week Begin: 05 December 2025

	Total Volume	85th Percentile	Mean Average	Standard Deviation	Bin 1 <30Mph	Bin 2 30-<35	Bin 3 35-<40	Bin 4 40-<45	Bin 5 45-<50	Bin 6 50-<55	Bin 7 55-<60	Bin 8 60-<65	Bin 9 65-<70	Bin 10 70-<75	Bin 11 75-<80	Bin 12 80-<85	Bin 13 =>85
Fri 5 Dec	1128	43	36	6	219	319	333	164	64	20	5	3	1	0	0	0	0
Sat 6 Dec	910	43	37	6	144	268	277	144	58	12	3	3	1	0	0	0	0
Sun 7 Dec	555	43	36	6	123	136	156	88	38	11	2	1	0	0	0	0	0
Mon 8 Dec	1311	43	36	6	239	390	370	200	79	17	14	0	1	1	0	0	0
Tue 9 Dec	1521	43	36	6	285	417	443	262	70	33	5	4	2	0	0	0	0
Wed 10 Dec	1641	43	37	6	318	425	491	284	79	25	10	6	2	0	1	0	0
Thu 11 Dec	2087	42	36	6	469	589	589	298	99	29	12	2	0	0	0	0	0
5 Day Ave.	1538	43	36	6	306	428	445	242	78	25	9	3	1	0	0	0	0
7 Day Ave.	1308	43	36	6	257	364	380	206	70	21	7	3	1	0	0	0	0

DO NOT CHANGE THE STRUCTURE OF THE SPREADSHEET (i.e. add or delete rows/columns, modify formulas, etc.)

Site No. A4888
BURSTALL ROAD - SPROUGHTON

Lat/Lng. 52.0547 1.07034
Channel: Southbound

Speed Report (Speed Limit 60 Mph)
Week Begin: 12 December 2025

	Total Volume	85th Percentile	Mean Average	Standard Deviation	Bin 1 <30Mph	Bin 2 30-<35	Bin 3 35-<40	Bin 4 40-<45	Bin 5 45-<50	Bin 6 50-<55	Bin 7 55-<60	Bin 8 60-<65	Bin 9 65-<70	Bin 10 70-<75	Bin 11 75-<80	Bin 12 80-<85	Bin 13 =>85
Fri 12 Dec	947	43	36	6	205	247	268	148	45	20	10	1	2	1	0	0	0
Sat 13 Dec	670	44	38	6	72	202	183	133	54	19	4	3	0	0	0	0	0
Sun 14 Dec	559	44	38	7	58	148	180	117	29	13	9	2	2	1	0	0	0
Mon 15 Dec	848	43	36	6	164	251	240	125	38	21	8	1	0	0	0	0	0
Tue 16 Dec	892	43	37	6	139	273	251	140	58	18	9	2	2	0	0	0	0
Wed 17 Dec	1072	41	35	6	312	309	274	111	47	9	9	1	0	0	0	0	0
Thu 18 Dec	822	43	36	6	170	269	200	111	52	13	7	0	0	0	0	0	0
5 Day Ave.	916	42	36	6	223	272	247	124	44	17	7	1	1	0	0	0	0
7 Day Ave.	830	43	36	6	177	244	228	124	43	16	7	2	1	0	0	0	0

Site No. A4888
BURSTALL ROAD - SPROUGHTON

Lat/Lng. 52.0547 1.07034
Channel: Northbound

Speed Report (Speed Limit 60 Mph)
Week Begin: 12 December 2025

	Total Volume	85th Percentile	Mean Average	Standard Deviation	Bin 1 <30Mph	Bin 2 30-<35	Bin 3 35-<40	Bin 4 40-<45	Bin 5 45-<50	Bin 6 50-<55	Bin 7 55-<60	Bin 8 60-<65	Bin 9 65-<70	Bin 10 70-<75	Bin 11 75-<80	Bin 12 80-<85	Bin 13 =>85
Fri 12 Dec	1405	44	37	6	234	362	400	250	109	29	13	4	3	0	1	0	0
Sat 13 Dec	855	44	38	6	102	188	291	169	63	26	11	5	0	0	0	0	0
Sun 14 Dec	647	45	38	6	69	156	208	127	58	20	6	2	1	0	0	0	0
Mon 15 Dec	1161	44	37	6	191	316	328	212	72	26	11	2	3	0	0	0	0
Tue 16 Dec	1430	44	37	6	210	363	445	271	90	39	9	3	0	0	0	0	0
Wed 17 Dec	1764	42	36	6	377	444	574	260	76	21	9	1	2	0	0	0	0
Thu 18 Dec	1260	43	37	6	209	338	364	239	73	28	4	3	2	0	0	0	0
5 Day Ave.	1404	43	37	6	277	401	440	253	86	28	10	3	2	0	0	0	0
7 Day Ave.	1217	43	37	6	222	335	386	223	78	26	10	3	1	0	0	0	0