



Burstall Parish Council

Written Representation Deadline 2:

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

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Introduction

This submission is our response to the NGET responses submitted at Deadline 1 to our Relevant Representation and our presentation by Councillor William Petersen at Open Floor Hearing 1.

Document 8.4.1 provides NGET's response to Relevant Representations and Burstall Parish Council has been grouped into the main thematic response.

Document 8.5.4 provides NGET's response to the Open Floor Hearings. All presentations have been grouped into thematic responses.

This submission also provides our detailed response to our concern of Permanent Visual Impact (Wirescape) and Mitigation, for which we were awaiting to see the NGET responses at Deadline 1.

This submission will continue to be segmented into our 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 also assert that **parts of the Environmental Statement (ES) remain incomplete** and the Applicant must provide additional information to satisfy this shortcoming.

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 several 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. We also used AI to scan application documents to double check we hadn't missed relevant responses and details from our manual checks since NGET insisted information was there.

Policy Conflict Summary

The below table is a summary of the policy failures we have identified.

For items written in normal text, the supporting information can be found in our Written Representation at Deadline 1. For items written in *italics* the supporting information can be found in this document submitted at Deadline 2.

As the Examination proceeds, we will update the table as and when NGET provide sufficient information to satisfy the conflict we identified.

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	Policy Satisfied?
NPS EN-1 & EN-5 Mitigation Hierarchy	Chooses to compensate – lower down the hierarchy - for visual impact instead of avoiding.	Chapter 1 – Failure 1	Outstanding
Electricity Act 1989 Section 9	Fails to develop and maintain an efficient and economical network.	Chapter 1 – Failure 2	Outstanding
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	Outstanding
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	Outstanding
NPS EN-1 4.1.7	Disengages the presumption in favour of consent.	Chapter 4 – Failure 7	Outstanding
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	Outstanding
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	Outstanding
NPS EN-5 2.9.14-15	Fails to assess a reasonable alternative proposed in Section 1.4.	Chapter 1 – Failure 5	Outstanding
NPS EN-1 and EN-5	Fails to assess security and resilience risks.	Chapter 4 – Failure 1, 3, 4, 5, 6	Outstanding

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	Outstanding
	Fails to assess alternatives from a security risk perspective.	Chapter 4 – Failure 2	Outstanding
The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 Regulation 4	Fails to provide a complete ES – consent prohibited. <i>Fails to provide an ES in respect of the application – consent prohibited.</i>	Chapter 1 – Failure 1, 3, 4, 5 Chapter 2 – Failure 1, 2 <i>Chapter 3 – Failure 2</i> Chapter 4 – Failure 1, 2, 3, 4, 5	Outstanding
<i>The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 Regulation 5</i>	<i>Fails to assess impacts in an appropriate manner – consent prohibited.</i>	<i>Chapter 3 – Failure 2</i>	
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	Outstanding
	Fails to assess risks from major accidents or disasters – ES is incomplete	Chapter 4 – Failure 5	Outstanding
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	Outstanding
	Fails to conduct a Site-Specific Risk Assessment for major CNI projects.	Chapter 4 – Failure 3	Outstanding
Rochdale Envelope	Fails to assess the worst-case scenario.	Chapter 4 – Failure 8	Outstanding
<i>NPS EN-1 5.4.44</i>	<i>Fails to maintain planting for the lifetime of the project.</i>	<i>Chapter 3 – Failure 1</i>	<i>Outstanding</i>
<i>NPS EN-5 2.10.8</i>	<i>Fails to maintain mitigation planting for the lifetime of the project.</i>	<i>Chapter 3 – Failure 1</i>	<i>Outstanding</i>

1. A Strategic Approach to Undergrounding

Our interest in undergrounding the 400kV line falls into two distinct categories:

1. Cost/Impact Benefits of it as an Alternative Design
2. Security and Resilience

This Chapter is focused on its Cost/Impact benefits from an Alternative Design approach. The security and resilience perspective is covered, where relevant, in Chapter 4.

Relevant Representation Response

We wish to clarify that our concern of strategic undergrounding is not asking for existing 400kV lines to be put underground. We are asking for the cost comparison of undergrounding a short section of the proposed new 400kV lines and retaining all existing overhead lines in the area versus undergrounding three separate 132kV lines and building 400kV pylons.

NGET appear to have determined that the impacts of a new 400kV line south of Bramford substation are unacceptable in policy terms, hence their proposal for the 132kV undergrounding as mitigation. And we agree the impacts are unacceptable.

However, we continue to assert NGET have failed to demonstrate that they have followed the Mitigation Hierarchy correctly – Avoid > Reduce > Mitigate > Compensate. They appear to have jumped to the sole conclusion that undergrounding the existing 132kV lines is the only way to deal with the unacceptable impacts. Undergrounding the proposed 400kV line in this area to avoid the impact is also an option, which continues to go unassessed.

Further, we note that NGET regularly refer to their 'robust' *Strategic Options Backcheck and Review* document regarding alternatives such as undergrounding. The NGET approach to alternatives appears to focus on an all-

underground or all-offshore alternative, which presents a false choice of options to the ExA.

We are asking for an analysis of a hybrid alternative that considers the costs of mitigation (undergrounding existing functional 132kV overhead lines) versus a short section of new 400kV undergrounding.

While NGET appear to show breakdowns of costs for overhead lines versus underground cable, we could find no breakdown of the cost to underground the three 132kV lines south of Bramford substation.

The analysis provided by NGET in their *Strategic Options Backcheck and Review* cannot be robust - and has a methodological gap - if it only considers all or nothing scenarios and excludes hybrid options that could solve the local issue south of Bramford substation, as well as in other locations. Without this cost-benefit analysis the ExA cannot determine if the proposal truly is 'economic and efficient'.

Open Floor Hearing 1 Response

Due to time constraints, undergrounding was raised in Open Floor Hearing 1, however this was from a security and resilience perspective and so is discussed in Chapter 4 of this document instead.

2. Construction Disturbance and Mitigation

Relevant Representation Response

We note that NGET attempt to address the issue of unsuitable country roads, construction traffic routes, and diversion routes in their response. And they direct interested parties to various documents in the application.

We have rechecked the documentation and those documents do not address our concerns. We continue to assert that the information we requested in our Written Representation at Deadline 1 needs to be supplied so that we can respond further.

Open Floor Hearing 1 Response

Due to time constraints and the technical detail required, we did not discuss this issue at the Open Floor Hearing.

3. Permanent Visual Impact (Wirescape) and Mitigation

Preliminary Note: Prior to Deadline 1 we noted that the Examining Authority requested further details from the applicant regarding alternative pylon designs, including that of T-pylons and lower lattice pylons. Due to the exposed profile and high elevation south of Bramford substation, we were interested in the NGET response to help inform our submission on this concern.

3.1 Relevant Policy

NPS EN-1

5.4.44 The Secretary of State should consider what appropriate requirements should be attached to any consent and/or in any planning obligations entered into, in order to ensure that any mitigation or biodiversity net gain measures, if offered, are delivered and maintained. Any habitat creation or enhancement delivered including linkages with existing habitats for compensation or biodiversity net gain should generally be maintained for a minimum period of 30 years, or for the lifetime of the project, if longer.

NPS EN-5

2.10.8 Furthermore, since long-term management of the selected mitigation schemes is essential to their mitigating function, a management plan, developed at least in outline at the conclusion of the examination, and which sets out proposals within a realistic timescale, should secure the integrity and benefit of these schemes. This should also uphold the landscape commitments made to achieve consent, alongside any pertinent commitments to environmental and biodiversity net gain.

The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

4. (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.

5. (2) The EIA must identify, describe and assess in an appropriate manner...

3.2 Current Proposal and Impacts

3.2.1 T-Pylons

Burstall Parish Council agree with NGET that the use of T-pylons south of Bramford substation are inappropriate. Aside from the additional cost, land take, and access considerations of T-pylons, the introduction of a design different to the current lattice styles that clutter the landscape would create a very jarring visual effect here.

3.2.2 Lower-Height Lattice Style Pylons

After further reading and understanding of the application documents, responses to the Relevant Representations and Open Floor Hearings, and publicly available information, we understand that there are technical constraints of lower-height pylons that prevent them from being considered in the route chosen by NGET.

After more consideration of this, Burstall Parish Council do not wish to pursue the topic of lower-height pylons in the currently proposed route further.

However, we ask that NGET and the ExA consider the hybrid proposal of a gas-insulated line to lower-height pylons by Councillor William Petersen – to be submitted separately at Deadline 2.

Please note that this does not supersede our preferred option of strategic undergrounding that we proposed in Chapter 1 of our Written Representation at Deadline 1.

3.2.3 Planting as Mitigation

With regard to the quantity, type and location of planting to be used as either replacement, compensation, mitigation to reduce impacts, or additional in the form of a Biodiversity Net Gain, we will defer that judgement to be assessed by the expert authorities such as the Councils, Natural England, and the ExA, as well as the affected landowners.

The application includes an outline Landscape and Ecological Management Plan (oLEMP) – document 7.4 – and states in Chapter 10 Aftercare that NGET intend to implement a five-year monitoring period for tree and hedgerow planting. This five-year period will include replacing any failed planting.

This five-year plan is also reiterated by NGET throughout their responses to the Relevant Representations and Open Floor Hearings, including the assertion that this timeframe is standard industry practice for previous projects like this.

3.3 Conflict and Policy Failure

Both NPS EN-1 and EN-5 make it clear that any mitigation must be maintained for the long-term, including the projects lifetime.

Whilst NGET assert that five years has been the industry standard for previous projects, that is not aligned with current policy. An outdated industry practice is not a valid reason to overrule statutory policy.

Where the ES determines that impacts are judged to be Significant, and that planting is required to reduce that impact to a Non-Significant or Residual impact, it is important to note that any reduction appears to be on the presumption that the planting reaches full maturity, and is then maintained at that maturity for the remaining duration of the project.

If the ES relies on full maturity planting to mitigate an impact, and that planting reaches maturity in year 15 for example, but the application proposes monitoring and

replacements stop at year 5, how does NGET guarantee the validity of its residual impact if the monitoring and replacements stopped at year 5?

In October 2025 the Environment and Climate Change Committee launched a new inquiry called Drought Preparedness, which sought to understand the impacts of drought on rural and urban areas in England. Written Evidence from Forest Research submits that:

Drought is a growing threat to conifer and broadleaf tree species. Drought both reduces mature forest functioning and has severely reduced the success of new planting.

Newly established trees, both conifer and broadleaf, are particularly vulnerable to episodic extreme drought events as access to water resources are limited by shallow rooting.

An analysis of the impacts on tree planting from the 2022 drought and heatwave suggest over 60% of newly planted trees were severely impacted on the most affected sites. The combination of drought and prolonged summer temperatures are increasing the challenge to successful establishment for both new planting and seed production dynamics.

Failure 1: A five-year monitoring plan is therefore insufficient to ensure planting reaches maturity. Most planting requires a 10-15 year timespan to reach full maturity – tall trees even longer.

NPS EN-1 makes it clear that planting should be maintained for the lifetime of the project, and NPS EN-5 states long-term management is essential for mitigation. If monitoring stops at year 5, then it is impossible to ensure the necessary planting is maintained for the lifetime of the project.

Failure 2: The residual impacts of the ES are concluded based on the presumption planting reaches full maturity and is maintained for the duration of the project. However, as the oLEMP

in the proposed application fails to secure delivery of that premise, then the conclusions of the ES are flawed and inaccurate.

The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 Regulation 5 (2), *“The EIA must identify, describe and assess in an appropriate manner...”* A flawed and inaccurate ES is not appropriate.

This then engages Regulation 4 (2) which prohibits the Secretary of State from granting permission, because the ES has not considered the proposed five-year monitoring plan submitted as part of the application within its conclusions.

3.4 Proposed Solutions

Lifetime Landscape and Ecological Management Plan

We request the ExA imposes a requirement on NGET to amend the Landscape and Ecological Management Plan to secure:

- Annual monitoring for the lifetime of the project.
- And where planting is identified as failed, replacements in the next available planting season, for the lifetime of the project.

We also ask the ExA to secure this Lifetime Landscape and Ecological Management Plan as a Requirement of the DCO.

Rationale 1: If the impacts are for the lifetime of the project, the mitigation must be too. Otherwise, any residual impacts are understated.

Rationale 2: If NGET monitor for 5 years, but trees or hedges die in subsequent years then any visual and ecological effects return to ‘Significant’, and the conclusions of the ES become invalid.

4. Security & Resilience of Critical National Infrastructure

Preliminary Note: 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.

Relevant Representation Response

NGET mention the risk to pylons and overhead lines from adverse weather (strong winds and lightning strikes) and people trying to climb the bases of pylons, but this was not the concern we expressed in our Relevant Representation. We have lived with large pylons in our parish for decades. We understand the pylons are designed to withstand and deter those issues.

There is no thematic response that addresses the security and resilience risk raised in our Relevant Representation.

Burstall Parish Council's concerns on this topic have always been, and remain, focused on:

- The unacceptable risks of concentrating energy infrastructure at and through a single-point of failure at Bramford substation.
- The unassessed risk to the wider UK economy, public safety, and defence in the event of a major failure at Bramford substation.
- The unassessed risk to the local communities and environment in the event of a major failure at Bramford substation.

We did look through the detailed responses given to statutory parties and could find no response that addresses our specific concerns there either.

The only vaguely similar point we could find was at point 62 of the Mid Suffolk and Babergh District Council detailed response, where NGET state "*Bramford Substation plays a critical role in supporting energy security across the East of England, and we are committed to ensuring that this function is never compromised.*" However, this is made in the context of operational continuity and access for businesses and residents near the substation. It is not apparent nor demonstrated that our concern has been considered, let alone assessed and mitigated against.

Open Floor Hearing 1 Response

Councillor William Petersen spoke at Open Floor Hearing 1 and was the third speaker on the agenda.

In the NGET response they correctly identify Burstall Parish Council's presentation under the theme of *Security and resilience of electrical infrastructure*. However, this where the accuracy and correlation ends.

Reading the response to the security theme it falls in line with that of the Relevant Representation response. It discusses weather related issues, maintenance for general wear and tear, anti-climbing deterrents, and surveillance for maintenance purposes. And the focus is entirely on the pylons. None of these are issues that we raised in the Open Floor Hearing. Our concerns remain ignored by NGET.

Conclusion

Burstall Parish Council continues to object to the Application and asserts that NGET failed to address the actual concerns we raised in our Relevant Representation and at the Open Floor Hearings.

With the detailed information provided in our Written Representation at Deadline 1, and this Written Representation at Deadline 2, we hope NGET now understands our position more clearly.

Until NGET provides the substantive evidence to satisfy the policy conflicts we have identified, we continue to assert that the Secretary of State is prohibited from granting consent under the Infrastructure Planning (EIA) Regulations 2017.