



Burstall Parish Council

Written Comments Deadline 3:

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 provides our written comments to the NGET response received at Deadline 2 [REP2-029].

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.

ExQ1

As per the request of the ExA in ExQ1 GEN 1.1, this and future submissions will be recategorized in line with the Initial Assessment of Principal Issues (IAP1) and the categories in the ExQ.

We have recategorized our original Chapters as follows:

Chapter 1 – A Strategic Approach to Undergrounding is now under Alternatives.

Chapter 2 – Construction Disturbance and Mitigation is now under Transport and Traffic.

Chapter 3 – Permanent Visual Impact (Wirescape) and Mitigation is now under Biodiversity, Ecology, and Nature Conservation.

Chapter 4 – Security & Resilience of Critical National Infrastructure is now under Safety and Security.

No questions have been asked of Burstall Parish Council directly, and there are no questions we wish to respond to now that would not duplicate previously submitted information.

NGET Relevant Representation Response

In the Cover Letter for Deadline 2 [REP2-001] the Applicant states they will incorporate their

response to Burstall Parish Council's Relevant Representation within their response to our Written Representation in document 8.8.1 [REP2-029]. We accept this approach, although we have some concerns about the accuracy and detail of the Written Representation response, which we explain further below.

Errata

Within our Written Representation to Deadline 1 [REP1-151], in Chapter 4 we wrote that of the five 132kV OHL that go into Bramford substation, one of them finishes the route underground. We have since been informed that two of them do this, not one. Two routes end with a terminal pylon near the substation and finish the final route into the substation underground.

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.

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 [REP1-151]. For items written in *italics* the supporting information can be found in our Written Representation submitted at Deadline 2 [REP2-034].

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	Partially Satisfied. Diversion clarified but issues with choice outstanding.
NPS EN-1 4.4.5	<i>Fails to assess cumulative construction impact in conjunction with Bramford to Tilbury NSIP - ES is incomplete.</i>	<i>Chapter 2 – Failure 2</i>	<i>Satisfied at Deadline 2.</i>
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 Chapter 3 – Failure 2 Chapter 4 – Failure 1, 2, 3, 4, 5	Outstanding. Ch2 F2 satisfied at Deadline 2.
<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
NPS EN-1 5.4.44	<i>Fails to maintain planting for the lifetime of the project.</i>	<i>Chapter 3 – Failure 1</i>	<i>Outstanding</i>
NPS EN-5 2.10.8	<i>Fails to maintain mitigation planting for the lifetime of the project.</i>	<i>Chapter 3 – Failure 1</i>	<i>Outstanding</i>

Alternatives

Mitigation Hierarchy

In response to our assertion that NGET have failed to follow the Mitigation Hierarchy correctly for the proposal, they state:

The Applicant disagrees with the interpretation presented which infers that mitigation is applied in order to avoid any and all impacts.

We understand the NPS do not require all impacts to be avoided and that residual impacts may remain after the application of the mitigation hierarchy.

The mitigation hierarchy is a clearly defined structure which requires Applicants to mitigate against adverse impacts in a specific order: avoid > reduce > mitigate > compensate. Compensation is the last resort, and therefore it is more important to implement mitigation that avoids, reduces, or mitigates harm first.

For the mitigation hierarchy to be applied correctly, the options that would enable avoidance must be examined before the process moves to consider steps that will facilitate impact reduction, and so forth down the hierarchy.

After sequentially following the steps in the mitigation hierarchy it is then the residual impacts which are taken forward into the balancing process, and we have recognised this throughout our Written Representation at Deadline 1.

NGET refer us back to their Planning Statement [APP-085] which details their assessment of the mitigation hierarchy. On page 3 they write:

...in accordance with NPS EN-1 (DESNZ 2024a) the mitigation hierarchy has been applied during the iterative design process to, in the first instance, avoid creating adverse effects, prevent, reduce and finally, if possible, offset adverse effects.

NGET appear to have not done this and seem to have applied the mitigation hierarchy inconsistently, rather than considering options by working their way down through the hierarchy.

We are also aware that even low residual effects, perhaps due to overcompensation, are still considered unacceptable in planning terms where the mitigation hierarchy has not been applied correctly.

In determining the route and technology for the proposal, NGET appear to have chosen Bramford substation for its importance within the transmission network. The substation is not within a National Landscape Area and the NPS indicates OHL's are a starting point in this situation. But the Applicant appears oblivious to the idea that a starting point and a proposed and properly justified finished design are not necessarily the same thing. An 'all or nothing' comparison approach to undergrounding outside of designated landscapes is used, even though there may be alternatives. This presents a false choice to the ExA.

We are aware that the area south of Bramford substation is not a nationally designated landscape, and the starting presumption is OHL. However, NGET state in their response:

Policy does also require that there is consideration of whether the use of cable is justified in circumstances where landscape and visual effects are widespread and significant (paragraph 2.9.23 of EN-5), however the Applicant's position is this criteria is not met around Bramford.

This claim is now contradictory to NGET's reasoning for undergrounding the 132kV lines in the first place, which their Planning Statement [APP-085] at paragraph 7.1.19 states is to "help to reduce Landscape and Visual effects."

It is important to note that NGET try to frame the 132kV line undergrounding under the 'reduce' category, but this would be an incorrect allocation. The reduce step applies to the reducing the primary harm of the project itself, i.e. reducing the impact of the proposed 400kV

OHL. Undergrounding the 132kV lines falls into the compensation category – the lowest and last resort option of the mitigation hierarchy.

Furthermore, NGET claim the landscape and visual effects are not significant enough around Bramford. In ES Chapter 13.7 under Residual Effects [APP-226], NGET state that effects would be:

- During Construction – Landscape Effects - Significant Adverse within 1.5km
- During Construction – Visual Effects - Significant Adverse within 1.5km
- Operation: Landscape Character - Moderate and Significant Adverse within 1km
- Operation: Landscape Character - Moderate and Significant Adverse within 1.5km
- Operation: Visual Effects – Major and Significant Adverse within 0.5km and Moderate and Significant Adverse within 1.5km

The operational effects would not reduce during the project’s lifetime, and there would also be lesser adverse effects beyond the distances quoted. If these are not widespread and significant enough, then we ask the ExA to question NGET on what threshold is?

We note that it may be acceptable to offer a compensation solution, but it does not absolve NGET from demonstrating with evidence what options were considered to avoid, reduce, and mitigate the impacts for each location.

We ask the ExA to require NGET to explain what options were considered to avoid, reduce, and mitigate the visual impacts to the south at Bramford substation, when they were considered in the design process, and why they were dismissed before they chose to compensate for them by undergrounding three existing functional 132kV lines.

Horlock Rules

We understand the response by NGET, however we note they justify their response based on

following the mitigation hierarchy. As we have explained, there is a gap in their application of the mitigation hierarchy which still needs to be filled in.

Economic Design

NGET’s primary reason for not following the mitigation hierarchy is cost.

We note that NPS policy allows cost to be given more weight in the mitigation hierarchy as a reason for transmission projects to dismiss steps. But it must still be evidenced and as stated, the ‘all or nothing’ approach gives a false choice to the ExA.

NGET continue to assert that their proposal is more cost effective than our proposed alternative:

The Applicant takes a different position regarding the balance of economics and efficiency between the replacement of sections of existing 132 kV lattice pylon by the installation of 132 kV underground cables or the installation of the new 400 kV connection as 400 kV underground cables. This position arises as they have very different scales of impact and cost.

NGET go on to explain the difference in works such as trench width and transition structures, and then reasserts that there is a substantial difference in cost:

Given these differences and with substantial divergence in cost (132 kV undergrounding is substantially cheaper) there is a clear case for the approach taken by the Applicant to underground existing lower voltage lines and retain the 400 kV as overhead line.

However, this claim of a cheaper cost continues to be unsubstantiated as NGET supply no evidence of the actual costs involved with undergrounding the 132kV lines.

Online suggestions for the costs of undergrounding 132kV lines appear to vary considerably, and appears to consider new lines. Here NGET also need to dismantle existing OHL.

It would be unreasonable for NGET to claim the costs for undergrounding the 132kV lines have not been assessed, because the work to carry out this has been included in the Funding Statement as a high-level figure. How can the high-level figure be calculated if the breakdown of associated works has not been calculated?

We ask the ExA to require NGET to be transparent in their claim and stop withholding the specific cost breakdown of undergrounding the 132kV lines. Without knowing the actual costs, the ExA cannot determine if the proposal really is cheaper as NGET claim.

Delivery Time

NGET continue to claim that their proposal is much quicker to implement compared to our proposal of retaining the 132kV lines and undergrounding the 400kV line. However, as with the argument about cost, this assertion remains unsubstantiated and online references vary substantially.

Within the Planning Statement [APP-085] at paragraph 7.1.19 NGET state:

Prior to the commencement of construction works for the Project, several existing overhead and underground third-party services would need to be diverted, removed, undergrounded, or protected.

The project itself is delayed specifically because the proposed compensation to underground the 132kV lines must be fully completed first.

We ask the ExA to require NGET to provide a delivery timeline that compares their current proposal with our proposed alternative, and the cost impact that delay has on the delivery of the project.

Reasonable Alternatives

NGET suggests that 'reasonable alternatives' are only those that they choose to study. This is a circular and legally flawed interpretation. If an Applicant could satisfy the law simply by choosing not to study an alternative because they don't want to, even if it meets all the criteria of a reasonable alternative, then the

purpose of the EIA Regulations becomes powerless, and it becomes questionable if a profit-driven company would ever put forward an environmentally superior option for scrutiny.

Regardless of whether the EIA Regulations provides a list of what constitutes a 'reasonable alternative' or not, NGET have provided a list of criteria for reasonable alternatives themselves. As we put forward in our Written Representation at Deadline 1, our proposed alternative meets all of those criteria.

NGET have not demonstrated that our proposed alternative does not meet any of the criteria - they have simply said they do not have to consider it if they don't want to.

If NGET has already determined that undergrounding is a necessary and viable option at this location, on what evidence have they concluded that undergrounding the 132kV lines represents a lower cost, delivery, and environmental impact compared to undergrounding the 400kV line and retaining the 132kV lines?

Biodiversity, Ecology, and Nature Conservation

As our detailed comments on this were submitted at Deadline 2, we understand that no response has been received yet. We note our concerns appear to be covered under the ExQ1 and we await the NGET response at Deadline 3.

Safety and Security

Standing Note: Burstall Parish Council includes two Councillors with a professional background in security and resilience, including Critical National Infrastructure. This section is informed by that relevant professional expertise.

We appreciate that the response from NGET has moved beyond the risk of children climbing pylons and some bad weather, and attempts to acknowledge our much more serious and widespread concern of security and resilience of Bramford substation itself.

We note NGET's response about flooding concerns being included in the Hydrology Land Drainage and Flood Risk chapter, and about EMF radiation, however we did not raise those issues as a concern.

Before we progress in our response, we wish to point out that whilst our concern is focused on Bramford substation, because that is the one we have more experience and knowledge of, the risks we raise are potentially applicable to the Norwich Main, EACN, and Tilbury substations.

NGET reiterate that they are aware of the National Electricity Transmission System Security and Quality of Supply Standard (NETS SQSS) requirements, as stated in their ES and various other documents, such as the Strategic Back Check and Review [APP-355]. However, the NETS SQSS requirements are a minimum requirement to maintain grid stability under normal operating conditions. This is not in the same context as our concerns regarding Critical National Infrastructure (CNI).

There is no context within any of the documents that shows security and resilience consideration of the CNI transmission infrastructure beyond the compliance of NETS SQSS.

National policy requires operators of CNI to assess plausible worst case scenarios as outlined in the National Risk Register and NPSA

guidance documents such as '*Beyond the Perimeter*'. This is not just national security policy, but under the Rochdale Envelope it is national planning policy too. Applicants are required to demonstrate that the plausible worst case scenarios really have been assessed, which NGET fail to do. Given that the NPS EN-1 and EIA Regulations 2017 strictly prohibit approval of applications that have unacceptable risks to human health and public safety, the need for NGET to demonstrate compliance is substantial.

Furthermore, NGET's explanation for excluding the Brunfort BESS from the cumulative impact assessments - due to an arbitrary cut off date of 1st April 2025 - is concerning. The Written Representation by the developer Alcemi Storage Developments 1 Limited [REP1-198] states they have been in negotiation with the NGET Norwich to Tilbury project team since late 2023. Part of the project – *Alcemi Bramford Battery 500MW* – is also listed on *Table 3.2 – Planned Generation for East Anglia* in the 2024 Strategic Back Check and Review (Appendix B of document APP-355.) Whilst NGET are correct there is limited information in the public domain, the context of the Alcemi representation demonstrates that NGET had access to very relevant information. Claiming the project information was not foreseeable is factually incorrect.

We acknowledge that the ExA has stated there is not enough time within the statutory examination timeline to add any additional hearings to the schedule. We have signed up to Issue Specific Hearing 2 to continue the discussion on this topic as necessary.

We continue to appreciate that the topic is of a sensitive nature, but again we assert that the absence of even confidential or redacted documents, and the absence of the NPSA as a consultee is alarming.

If the ExA cannot examine a Site-Specific Risk Assessment that models the plausible worst case scenarios outlined in the National Risk Register, then they are being asked to make a recommendation to the Secretary of State

based on faith, not evidence. A recommendation that could be in breach of NPS EN-1 policy 4.1.7, which prohibits consent where there is unacceptable risk to human health and public safety.

The current approach NGET appear to be taking of “we did the work - trust us” remains legally insufficient. If all applications could do this, it would undermine the purpose of producing a comprehensive ES for examination purposes.

We continue to appreciate that the Scoping stage concluded that a standalone Major Accidents and Disasters topic was not required because there “...are no likely significant effects.” However, we must point out that the Scoping Report submitted at the Scoping Opinion stage contained one bullet point on “Security threat” and the Scoping Opinion is only as strong as the information provided by NGET at the time.

It is reasonable to conclude that the ExA were provided with understated information by the Applicant at the Scoping stage given that NGET:

- fundamentally misunderstood our concern regarding security in their responses at Deadlines 1 and 2, conflating them with climbing pylons and strong winds;
- repeatedly failed to provide adequate information on security matters;
- failed to involve the NPSA as a consultee;
- and provided extremely limited information at the Scoping stage;

We note that the ExA has recognised our concerns by asking several questions at ExQ1 regarding security, including Bramford substation, and we wait to see the NGET response at Deadline 3.

We ask that the ExA invite the NPSA to be a consultee in the Examination.

Transport and Traffic

NGET have now provided a detailed response to our specific locational concerns. However, new concerns are raised about the information provided.

Diversion Routes

We have studied Plan A in APP-035 again and can now see the proposed diversion route. It was not clear due to the similar colour and line style used, alongside the overlap of the closed roads and diversion routes. The text explanation that NGET provided is useful for clarifying this.

Though we ask NGET to check the roads identified in their diversion route:

The diversion route for closure of Burstall Lane between SM-C-001 and SM-C-002 is via Burstall Lane (SMD-C-002), the A1071 Hadleigh Road (SMD-C-003), and the B113 High Street (SMD-C-004) is shown on Plan A in 2.5 Access, Rights of Way and Public Rights of Navigation Plans – Section C [APP-035].

We believe this should read:

The diversion route for closure of Burstall Lane between SM-C-001 and SM-C-002 is via **Burstall Road** (SMD-C-002), the A1071 Hadleigh Road (SMD-C-003), and the **B1113** High Street (SMD-C-004) is shown on Plan A in 2.5 Access, Rights of Way and Public Rights of Navigation Plans – Section C [APP-035].

And:

The diversion route for closure of the A1071 Hadleigh Road between SM-C-003 and SM-C-004 is via Burstall Lane (SMD-C-002), Burstall Lane (SMD-C-001) and the B113 High Street (SMD-C-004), as shown on Plan A in 2.5 Access, Rights of Way and Public Rights of Navigation Plans – Section C [APP-035].

We believe this should read:

The diversion route for closure of the A1071 Hadleigh Road between SM-C-003 and SM-C-

004 is via **Burstall Road** (SMD-C-002), Burstall Lane (SMD-C-001) and the **B1113** High Street (SMD-C-004), as shown on Plan A in 2.5 Access, Rights of Way and Public Rights of Navigation Plans – Section C [APP-035].

Assuming the above amendments are correct, we are satisfied with the diversion route for the Burstall Lane closure. We are not satisfied with the diversion route for the A1071 closure.

Unsuitable Diversion

With regards to the diversion route proposed for the A1071 closure, NGET state:

The diversion routes will follow the principle that they will use the same standard of road or higher where practicable and available. However, this is not practicable for the road closure for the A1071 Hadleigh Road.

The A1071 is a major A-road carrying high volumes of HGV traffic. Diverting this traffic on to a narrow country road, and a junction that cannot accommodate a turning HGV, creates a safety hazard.

We ask the ExA to require NGET to provide a swept-path analysis for an HGV at the Burstall Road/ Burstall Lane junction, and the Burstall Lane/ B1113 junction. If NGET cannot demonstrate that an HGV can make this turn without mounting the verge – and consequentially causing environmental damage – the proposed diversion requires further consideration.

Furthermore, the B1113 is a 7.5t weight-restricted road. By diverting HGV traffic to this road, NGET are effectively directing HGV traffic to commit a traffic offence.

Temporary Road Closures

NGET assert that temporary road closures and diversion routes will be of a short duration:

The road closures will be of short term duration (less than four weeks where needed for construction of highway works such as site

access points and cross over points, and less than a day, likely overnight, for overhead line netting activities to enable overhead line stringing).

NGET also state:

It is not expected that both roads will be closed simultaneously, and the proposed diversion routes will be available to the public.

And:

The Applicant envisages that the road closures will not be simultaneous and the proposed diversion routes will be available to the public.

‘Expected’ and ‘envisages’ provide uncertainty over the road closure timings. We ask NGET to commit in the DCO that the timing of the two road closures will not overlap.

We ask the ExA to question NGET why a temporary road closure of short duration absolves them from providing a diversion route that is physically possible for diverted traffic.

We also ask the ExA to question NGET on why they deem it acceptable to divert road users into committing a traffic offence for any length of time, and how they intend to rectify this.

We note that NGET intend to use a ‘Permit Scheme’ so that their contractor can co-ordinate these works, but this is a tool that is used to control the timing of road diversions and closures. It cannot physically widen a narrow road, alter a junction for HGVs, or waive the legal restriction of a weight-restricted road.

Temporary Speed Limit on Burstall Road

NGET’s response effectively refuses to implement the proposed 30mph speed limit on Burstall Road during the temporary road closures where it becomes a diversion route. NGET state this is because standard procedure does not require it where there are “no highway works proposed” on the road.

However, NGET have already stated that this is not a standard diversion. A standard diversion

uses the same standard of road or higher, and for the A1071 closure NGET stated this is not possible. They are applying a standard procedure to a non-standard diversion.

NGET fail to grasp the point of the request. During the temporary A1071 closure they are asking Burstall Road to become a major A-road. A task for which its design fails to meet UK standards for A-road design.

For a non-standard diversion, it is reasonable to insist on a non-standard or tailored solution. The road traffic survey we supplied in Appendix A to our Deadline 1 Written Representation demonstrates that there is already speeding on Burstall Road - a road that does not meet minimum A-road standards. Yet which NGET are asking it to be.

We ask the ExA to question NGET why they deem standard procedure applies to a non-standard diversion, and why the temporary speed limit is irrelevant simply because no works are proposed on the road.

We also ask the ExA to seek the opinion of Suffolk Highways for their view on our request for a temporary 30mph speed limit on Burstall Road while the A1071 closure uses Burstall Road as part of the diversion route.

Cumulative Construction Effect with Bramford to Twinstead DCO

We note the NGET response regarding the cumulative construction impacts with Bramford to Twinstead, and we are satisfied that impacts would be handled through the Outline Construction Traffic Management Plan [APP-309] and Outline Code of Construction Practice [REP2-014].

Conclusion

Burstall Parish Council maintains its **OBJECTION** to the DCO application by NGET in its current form.

Despite the more detailed response by NGET at Deadline 2, several critical omissions remain in the information provided and our concerns remain unaddressed. Furthermore, the application continues in its failure to properly demonstrate compliance with several policies applicable to this project, which we have identified in our Policy Conflict Table at the start of this submission.

We ask the ExA to question NGET further to obtain the missing information we have highlighted in all our submissions, and we maintain our position that where the ES remains incomplete the Secretary of State is prohibited from granting consent.