Submission ID: SCE0CE56C

Matter 1: Resilience, Continuity, and Security

1. Inadequacy of Response. Whilst a lot of text has been provided by National Grid in response to issues of resilience, continuity and security, none of it appears of substance in answering the questions. National Grid has largely reiterated previous submissions without providing the new technical analysis or evidence required to address the specific vulnerabilities identified. This failure to engage with the substance of the representation leaves a critical evidentiary gap in the examination.

2. Absence of Worst-Case Scenario Analysis. The absence of any analysis of worst case scenarios resulting from either accidental or malicious activity means the risk of a large scale outage of national significance appears to remain unreviewed and unmitigated. While the sensitivity of Critical National Infrastructure security is acknowledged, this does not exempt the Applicant from providing a high-level, transparent appraisal of risk trade-offs and design alternatives. Without this, the risk of a national-scale outage remains unreviewed and unmitigated within the application.

3. Shift in Risk Profile. The risk itself appears to have been disregarded. Even if we could say the probability of such an outage had traditionally been low, global, regional and even national activity over the last few years, months and even days means this may now be elevated. In addition, the impact, whilst always high, will likely be even greater, given the increased reliance on electricity and the concentration of supply. As such, the resulting risk cannot be low, and must be at least medium, if not high, meaning mitigation is essential.

4. Mitigation and Design Dispersal. A sound design should incorporate risk dispersal. The current concentration of infrastructure, particularly when sited adjacent to flammable and toxic hazards (such as Battery Energy Storage Systems - BESS), represents a failure to apply the 'Safety by Design' principle.

5. Governance and Risk Acceptance. The ownership of risk sits higher than National Grid, possibly ministerial level (ie Cabinet Office). As a minimum, the assessment, review and mitigation of this risk should sit here. Ultimately, if this project goes ahead with the design unchanged, this risk must be publicly accepted.

6. Improper Scoping of Cumulative Impacts (Bruntford BESS). The exclusion of the Bruntford BESS from the cumulative impact assessment is a significant procedural flaw. Given that Alcemi has completed pre-planning and is in active correspondence with National Grid, this project is "reasonably foreseeable". Excluding what would be Europe’s largest BESS, situated immediately adjacent to the Bramford Substation, renders the current risk and environmental assessment incomplete.

Matter 2: Historic Environment (ES Appendix 11.2)

1. Omission of Heritage Assets. The assessment is factually incomplete as it omits key heritage assets, notably the moated site and house at [redacted] (Suffolk Historic Monuments). These are significant receptors that must be appraised to understand the full impact on the historic landscape.

2. Understatement of Cumulative Impact. The assessment of "Harm" to the Burstall village character is understated. It fails to account for the cumulative industrialisation of the village setting. The incremental addition of infrastructure projects is reaching a saturation point where the individual significance of heritage assets and the collective historic character of the settlement are being fundamentally eroded. A comprehensive reappraisal of these cumulative effects is essential.