

**Norwich to Tilbury – Deadline 5 submission  
Burstall Parish Council (10/6/26)**

**1. Security, Resilience & Continuity.**

Burstall Parish Council (BPC) has reflected on the previous responses from NGET regarding security and resilience. We also note that the ExA has requested the information for a second time in ExQ2 (SS2.1), and we support the Inspector's clear direction to NGET that confidentiality is not a valid excuse to withhold vital information from the Examination.

However, in addition to confidentiality concerns, previous responses from NGET repeatedly claim that Major Accidents and Disasters (MAD) were scoped out of the EIA at the Scoping stage, and so they are not required to assess the risks and impacts in the ES now.

BPC is reminded by our past experience that sometimes policies and legal principles must be explicitly stated. Even the most fundamental ones. This is not because the professionals forgot they existed. It is because something that is not explicitly stated on the formal record can be dismissed later on the grounds that no one actually said it.

BPC continues to assert that MAD was not scoped out. However, even if it was scoped out, Regulation 10 (10) of The Infrastructure Planning (Environmental Impact Assessment) 2017 states:

*"When the Secretary of State or the relevant authority has adopted a scoping opinion in response to a request under paragraph (1) or (2), neither the Secretary of State nor the relevant authority shall be precluded from requiring of the person who made the request additional information in connection with any statement that may be submitted by that person as an environmental statement or an updated environmental statement in connection with an application for an order granting development consent or a subsequent application for the same development as was referred to in the request."*

This means that the Scoping Opinion is not an immovable document carved in stone. It is a flexible and evolving opinion, and the ExA and Secretary of State have the right to request additional information from an Applicant at any point before a decision is published.

As this Examination has evolved, the ExA has deemed it necessary to request security and resilience information in order to make an informed decision. They have asked for it twice now, and NGET are obliged to provide the information.

Further, it is essential that any assessment of MAD clearly defines worst plausible case scenarios. We remain concerned that the applicant's definition of worst plausible case is incorrect and therefore misleading. It must include:

- a. Unforeseen incidents and accidents, including sabotage and attack;

b. Incidents at collocated sites, such as BESS;

Both of which may cause catastrophic impacts and prolonged outages.

The applicant is request to provide visibility of the worst case scenarios used, if this was covered, as stated, by their response to first written questions (REP3-101).

BPC wishes to add that whilst we make this point with security and resilience as our primary example, it applies equally to all topics where the ExA or Secretary of State requests information in order to complete the ES and to reach an informed decision.

Failure to provide the necessary information requested by the ExA (or later by the Secretary of State) renders the ES incomplete, and as asserted in our previous submissions, legally prohibits the granting of a DCO.

## **2. Cumulative Impact & Lack of Mitigation.**

We note ExA's questions concerning cumulative impact (GEN 2.3 & 2.5), but would have also expected specific mention of the Bramford Substation and Burstall village, where we would argue the cumulative impacts will be most strongly felt, as the only location impacted by both the Bramford to Twinstead project, the Norwich to Tilbury project and various other infrastructure projects, specifically the Brunfort BESS which must be included in the applicant's assessment of interrelationships (GEN2.4) (REP3-181 - the applicant states the Brunfort BESS has **not** been included in the cumulative assessment).

The cumulative assessment for the Brunfort BESS must be based on the 1.5GW capacity being applied for by AlceMI, not 500MW as listed, which is just their initial application.

DES 2.3 highlights the issue of substation extensions and we hope will include analysis of the extension to the Bramford Substation, which has already taken place and appears to be on artificially raised ground.

The fact that there is no mitigation offered to the Bramford Substation or Burstall village is significant and must be addressed.

## **3. Heritage Impact.**

REP3-181 - the applicant has stated that the heritage assets of Burstall Hall, and the moat at Burstall Hall are of low value, outside the order limits and therefore have not been assessed.

Further, applicant states that the 'embedded mitigation has been advanced to reduce cumulative effects' by burying 132kV only to replace them with much larger and more visible 400kV lines, which 'would not significantly alter the setting of heritage assets in

the wider landscape’ and that ‘residual cumulative harms remain at the very low end of the spectrum, consistent with the mitigation hierarchy’.

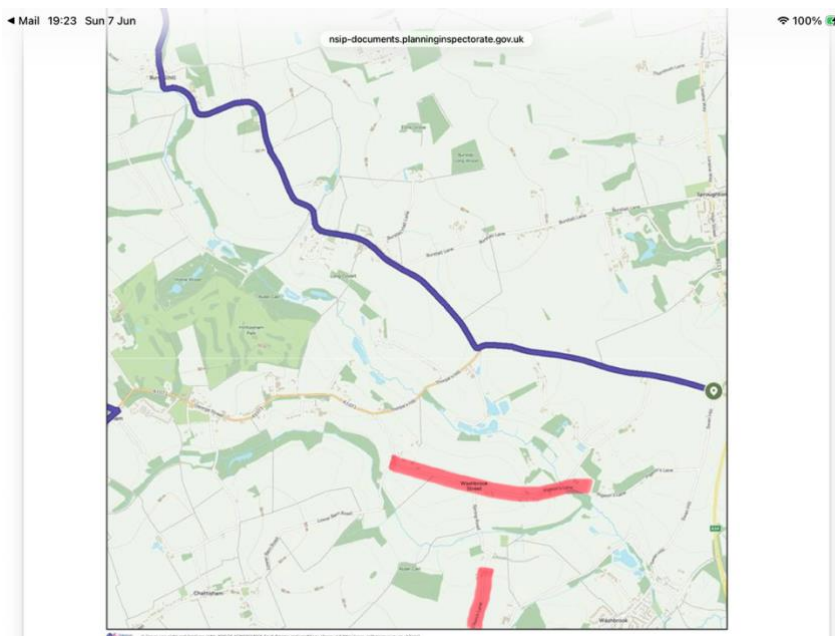
These statements take no account of any cumulative impact, the impact on the ‘historic character’ of the area, or the impact on the wider rural context (as defined by Virginia Brewer), and must therefore be revisited as we believe they are understating the true impact. These statements are simply incorrect and require review.

#### **4. Site Inspection Gaps.**

Burstall Parish Council wish to highlight gaps in the routes chosen to view the impact of the pylon route in the vicinity of Burstall village and the Bramford Substation. These are significant viewing areas which show the impact at their greatest and are shown in red in the attached maps. We have also drawn the gaps onto a copy of the interactive map to show how the gaps relate to the pylon route and attached a contour map to show viewing gaps. Our offer to accompany the Inspectors on a site inspection covering these gaps remains.

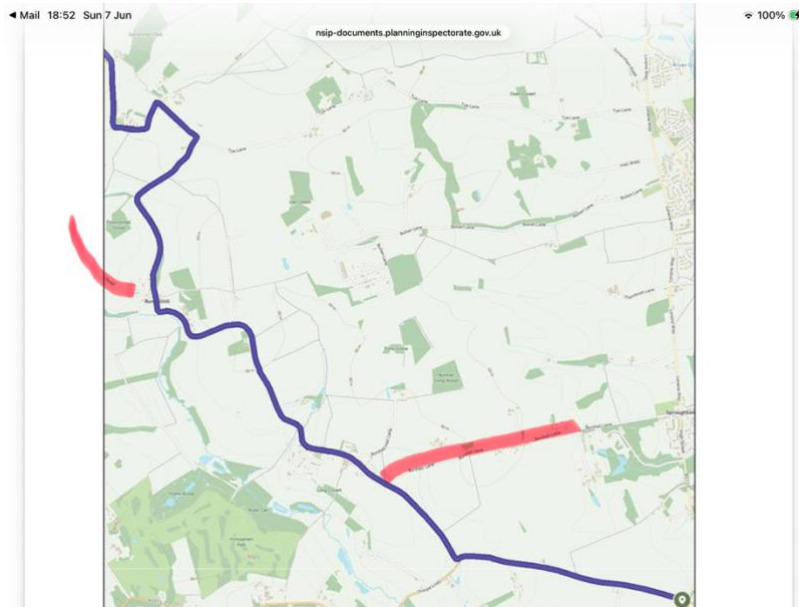
##### **a. Church Lane and Pigeon Lane, Washbrook.**

High ground to the south of the substation with significant uninterrupted views all the way to the substation . This location also lies on the proposed pylon route and shows the entire march of pylons south. 17 or 18 pylons will be visible from this vantage point. Despite us asking, I am not sure there has ever been a viewing or any analysis from this vital viewing area.



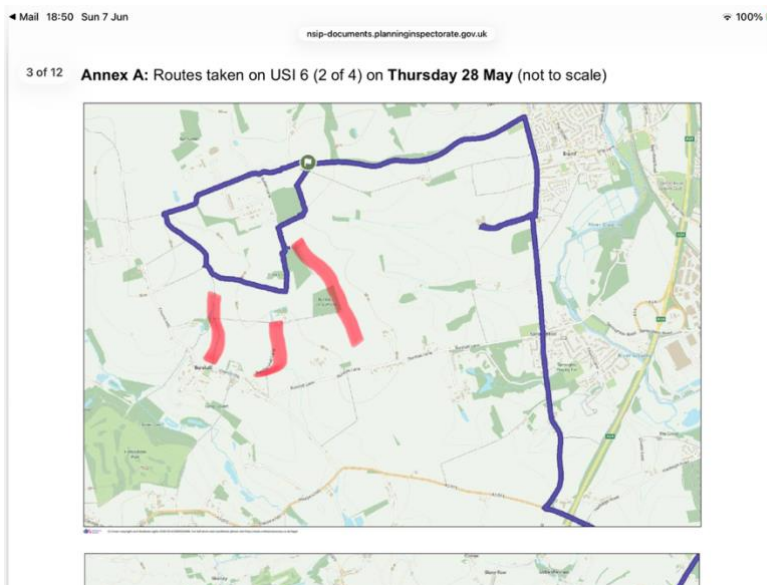
##### **b. Burstall Lane, Burstall & Flowton Road, Flowton.**

Significant gaps - Burstall Lane is self explanatory as the pylon cross this lane which also crosses the ridge line which the pylons will use to march southwards. Viewing here will highlight how a small move of the pylon route east would move them onto lower ground and therefore lessen all views. Flowton Road is high ground to the north west of the substation giving good views of the north and west of the substation. The route that was taken here (the channel) is low ground with no visibility of the substation and was therefore pointless in terms of showing local impact.



**c. Walking route -views of the substation from the south and view of the ground east of Round Wood and Burstall Long Wood.**

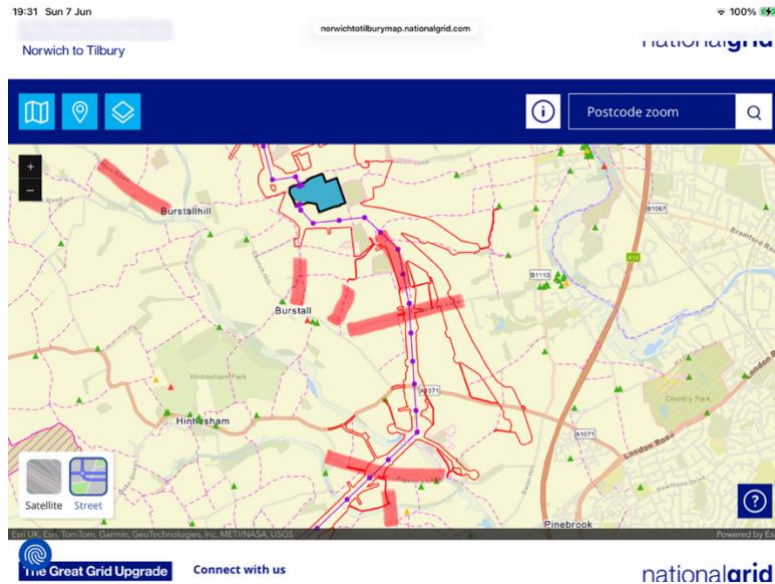
An opportunity missed to see the full impact from Burstall village. With only a small detour south, the impact specifically from the village would be visible, which is not nearly as obvious from the route which was taken. On the route walked, the inspectors will not have clearly seen how the ground falls to the east of Round Wood and Burstall



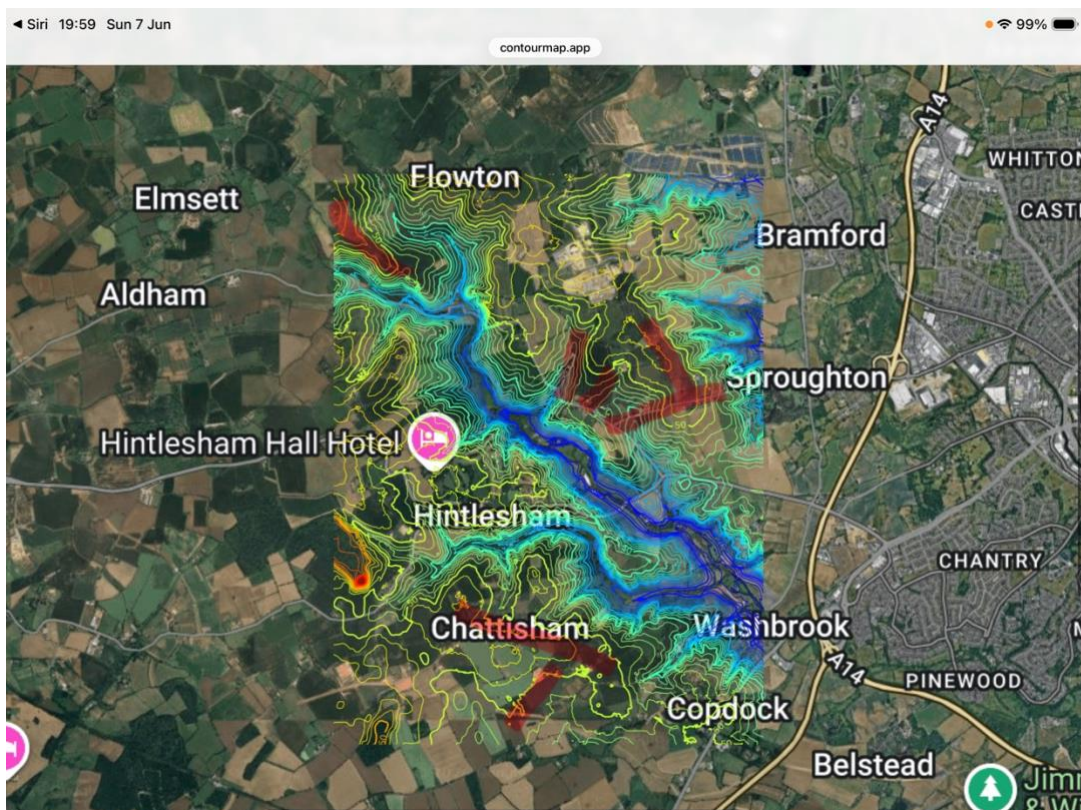
Long Wood, and therefore how a small move of the pylon route east here would have a significant impact of visibility of the pylons. However, the inspectors will have seen the advantages of routing the pylon exit from the substation east of Bullen Wood.

**d. Gaps superimposed onto N2T interactive map.**

The gaps in terms of the pylon route can be seen clearly below.



**e. Contour map showing viewing gaps (high ground) in red. Noting route taken in low ground (blue contours).**



## **5. Hedgerow destruction.**

Burstall PC and residents were extremely disappointed to witness large sections of mature and established hedgerow removed at the height of the bird nesting season at the Orchardlands area of Burstall.

Whilst this was part of a separate project, the Bramford to Twinstead reinforcement, what appeared to be a blasé approach, with no more than lip service being paid to ecological checks, makes us deeply concerned about the precedent this sets and the apparently willingness to try to 'get away with it'.

We can see no reason why removing this hedgerow during nesting season was necessary and why doing it outside the nesting season was not practicable. We would like to know who was responsible for giving the go ahead, what alternatives were considered, why these were not suitable, and how many live nests were identified and avoided during this clearance. Whilst we are aware this is outside the remit of the ExA to answer, we ask that special attention is paid to relevant conditions in the N2T project.