

Burstall Parish Council

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The Planning Inspectorate
Norwich to Tilbury Case Team
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15th June 2026

Dear Planning Inspectorate

Deadline 5 Further Submission: Interested Party Reference [REDACTED]

Dear Sir/ Madam,

The Areas of Particular Importance to Biodiversity (APIB) and Areas which Could Become Important for Biodiversity (ACB), as defined in the Local Nature Recovery Strategy (LNRS) copy below, encircle the north, east and south of the Bramford Substation, as well as the north and south of Burstall, including the Belstead Brook Corridor.

These are significant areas and it is apparent that neither the Norwich to Tilbury project nor the Brunfort BESS have taken these into account.

We are concerned that both projects are planning damaging developments which will have a significant negative and irreversible impact on biodiversity and the natural setting within these boundaries.

In contrast, Burstall Parish Council is looking to work with landowners to increase and enhance biodiversity in these areas and is obtaining funding, including through existing S106 money, to ensure these enhancements are undertaken.

Please add this comment to our submission.

Yours sincerely

[REDACTED]
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Clerk to the Parish of Burstall

Suffolk Local Habitat Map

 Request Data

 Dashboard & Tools

 Unmapped Measures

 Feedback

 Guide

Legend

 Layers

 Basemap

 Annotate

 Add Data

 Caveats

 Information

County Boundary



Areas of Particular Importance for Biodiversity (APIB)



Areas that Could Become Important for Biodiversity (ACB)



Norwich to Tilbury – Deadline 6 submission Burstall Parish Council (BPC) (7/7/26)

1. Security & Resilience

BPC remains concerned by the Applicant's continued evasion of scrutiny regarding security standards, especially given the hurdle which is currently preventing the ExA from legally recommending consent of their project.

NGET Openly Avoiding ExA Requests for Information:

Despite the ExA twice requesting details regarding security compliance NGET continue to withhold the information. BPC notes that zero Redacted or Confidential documents have been uploaded to the Examination Library on the topic of security.

An Applicant cannot simultaneously claim a project is safe while withholding the evidence required by law to prove that safety. If a major developer can openly ignore two direct requests from the ExA on the topic of public safety, then the DCO and EIA processes are undermined.

Misleading Claim about NETS SQSS:

Throughout application documents and responses to deadlines, NGET claim the project design complies with NETS SQSS obligations. Though no evidence to demonstrate this compliance has ever been submitted - even in confidential format - to this Examination.

BPC have raised concerns that SQSS is a minimum requirement of transmission operators, and that other standard requirements of CNI have not been considered by NGET. In response to our concerns, NGET asserted that the SQSS standard is *not* a minimum requirement [SS1.1].

We are bewildered by this claim which misleads the Examination. At paragraph 1.6 of the SQSS it states "*The criteria presented in this Standard represent the minimum requirements for the planning and operation of the national electricity transmission system.*" This is the same wording in v1.10 updated prior to the Examination started, as it is in the latest version 1.12 updated on 29th May 2026.

Lack of Transparency on other Standards:

Throughout the Applicant's responses, NGET have also claimed that a range of security standards and policies have been used to develop the proposal.

SS1.1 Response:

"With regards to MAD scenarios, these are already considered within the established regulatory and policy frameworks applicable to critical national infrastructure (CNI). These processes include appropriate and relevant risk assessments and operational processes to ensure an operable and resilient network."

Deadline 5 REP5-192:

"Substations are designed, operated and maintained in accordance with established industry standards and resilience requirements applicable to critical national priority infrastructure. Appropriate emergency response and incident management procedures are developed in consultation with the relevant emergency services and authorities, including arrangements to maintain access to operational infrastructure during both routine and emergency situations."

SS2.1 Response:

"Whilst compliance with the Security and Quality of Supply Standard (SQSS) forms an important component of network resilience, the Applicant does not rely solely on compliance with the SQSS when considering resilience and operational continuity.... Security considerations have been taken into account throughout the development of the Project, including through the application of established security design principles, consideration of physical and operational security design principles, consideration of physical and operational resilience, and engagement with relevant security stakeholders where appropriate."

Though, NGET never mention what this mysterious collection of standards are, repeatedly reciting confidentiality reasons. It is impossible for the ExA to verify the projects' compliance against unknown standards, and without a shred of evidence to support the claims.

The Applicant's claims are further undermined by the absence of any indication the relevant regional or local officers are aware of such "established security design principles, consideration of physical and operational resilience." While from a lay perspective we would not expect to be informed of the details, it would be reasonable and appropriate to be notified that they exist. It would also be not just reasonable but essential to be reliably informed they have been tested and were fully understood at all relevant levels.

The absence of any evidence that this is the case makes the Applicant's defence implausible at best.

Environmental Information Requests

Because the Applicant refuses to satisfy the Inspectors' questions, BPC has submitted formal requests under the Environmental Information Regulations 2004 to several public authorities.

In SS2.1 NGET states *"security considerations for the Project have been undertaken in accordance with established government guidance and through engagement processes with relevant security and advisory bodies, including the National Protective Security Authority and associated stakeholders where appropriate."*

The NPSA is the only authority named by NGET as a security consultee. However, we could not submit an EIR request to the NPSA because they are exempt from requests. However, as a branch of MI5 who do consider EIR requests on a case-by-case basis, we sent a request to MI5 instead.

We have also sent requests to Ofgem, NESO, and the Home Office.

Due to the security nature of the topic our requests are limited in their scope. They do not seek to obtain documentation or any substantive detail of consultations. Instead they strictly seek to verify that they happened. BPC will update the ExA as and when we receive responses.

2. Traffic

Burstall Lane/A1071 Diversion

In document REP4-298 NGET state, *"The Applicant notes the request for swept path analysis at the junctions on the proposed diversion route. The appropriate assessments, including swept path analysis where necessary, will be undertaken by the Main Works Contractor to confirm the diversion is suitable as part of the development of the traffic management plans."*

A key principle of the DCO process is that environmental impacts must be assessed before determination. By proposing a diversion route that is of a lower standard than the closed road, and refusing to provide a swept path analysis that demonstrates with verifiable evidence it is still suitable, NGET are asking the ExA to blindly grant consent for a diversion route without knowing the potential damage it would cause.

Official diversion routes must be capable of safely accommodating the traffic that will be using it. If an HGV cannot physically make the turnings without causing damage, and this damage is not acknowledged in the ES, then the ES remains incomplete. Local experience with "lost" HGVs proves that large vehicles cannot physically make these turns, resulting in gridlock, verge and habitat damage, and even damage to road signage. See photo below which is the junction between Burstall Lane and the village highlighting HGV damage due to insufficient design:



NGET state the alternative would be a 40 mile diversion, but also claim a 40 mile diversion is unacceptable for traffic. This may be the case for cars, who could still use

the currently proposed diversion. But a 40 mile diversion is common for HGVs in the countryside. NGET could split the diversion.

Furthermore, trying to force through an official diversion at the Determination stage, that turns out to be physically unviable when discharging conditions, puts an impossible burden on the Local Highway Authority. They are left defending a refusal for an unsuitable diversion that should have been resolved before determination. Furthermore, deferring this assessment risks delays later on when NGET need to make a Non-Material Amendment request to the DCO to change the consented diversion.

It is in everyone's interest to have the swept path analysis now. We ask again for the swept path analysis now, and failing that, we ask for a split diversion where cars can use the currently proposed diversion and HGVs use the longer 40 mile diversion.

30mph Road Limit on Burstall Road

We note that in response to our request for a temporary road limit along Burstall Road, NGET claim the diversion will only be for a short time overnight. This is all the more reason for a temporary 30mph limit. Night time darkness greatly reduces the visibility of road conditions for drivers, thus making the road even more dangerous for increased road traffic. This is not a road through an urban area lined with street lights. It is a narrow windy country road of varying widths. Relying on "standard procedures" for a highly non-standard diversion is a failure of NGET's duty of care to protect road users during disruption caused by their project, and yet another public safety issue.

3. Landscape/ Mitigation Opportunities.

National Grid Document: 8.4.12.2: Response to Appendix C, Action Point 27 – Burstall and Bramford Constraints and Opportunities Plans.

BPC is hugely disappointed with the Burstall and Bramford Constraints and Opportunities masterplan produced by NGET, which is inadequate, poorly thought out and potentially damaging to historic landscape and setting of our village. It fails to understand the nature of the historic rural landscape, the impact to the village and importantly, the damage to the environmental cause by the proposed works and the real opportunities for enhancements and improvements. Importantly, the plan is absent of any opportunities whatsoever between Burstall village and the pylon route/ Bramford substation.

Well documented, there is zero mitigation offered to Burstall from the proposed NGET pylon plan. The concentration of pylons from both the Bramford to Twinstead Project and the Norwich to Tilbury project directly impact Burstall village more than any other, yet the mitigation hierarchy here has been ignored, and the only appeasement offered has been an opportunity for landscape and planting mitigation.

To now discover a plan which offers nothing to mitigate prominent views and the impact from Burstall and surrounding areas south and west of the substation is both

unbelievable and unacceptable. To have the whole of the area south of the substation designated as either 'rich in biodiversity' or 'with the potential to be', under the Local Nature Recovery Strategy (LNRS), but then to have it ignored by the applicant makes a mockery of this plan.

With no consultation of the village, the PC and those with local knowledge, and no coordination with landowners and other interested parties, this plan suggests that the Applicant has failed to do any credible research in relation to mitigation in the village, and have seen the preparation of the masterplan as nothing more than a tick-box exercise.

We stress that BPC considers properly thought out biodiversity enhancements, planting and mitigation to be essential in relation to the pylons. We feel it is vital to be involved with the development of the plan which must take our concerns into account – we have a marked up plan and have completed a drone survey of the area which we would be delighted to share:

- No mitigation to views from the south of the Bramford Substation which represent the most prominent and impactful locally. Viewpoints not considered and not mitigated: Pigeon Lane; Hintlesham Golf Course; Orchardlands; Burstall Road; Hall Lane. Local knowledge can help provide solutions for planting to mitigate these views.
- Opportunities ignored for planting to boost the cover provided along Cooks Lane, currently the only barrier of natural vegetation between Burstall village and the substation, and we believe under threat of removal from this and other projects despite its ancient history and ancient trees. Many opportunities exist here to enhance an already treasured and well known historic route.
- Opportunities ignored to enhance the existing ancient woodland remnants with additional planting and wildlife corridors. Bullen Wood; Round Wood; Elms Grove; and, Burstall Long Wood, all under threat, can easily be enhanced by planting wildlife corridors between all, establishing one protected woodland area with a large border/ buffer zone. This would also work to shield views of the pylons from Burstall Village. The footpaths around these woodlands are treasured locally and represent tranquil amenity areas to enjoy the natural environment.
- The opportunity has been ignored to enhance the ancient copse to the south of the substation, west of Elms Grove. With various mature and tagged trees, this copse is likely to have been missed from the ancient woodland inventory and should be added to and enhanced. It forms part of the wider woodland area and well used wildlife corridors here should also be protected.
- Opportunities ignored for pond restoration and recovery, both in Elms Grove and Burstall Long Wood, visible on old maps and with great potential for biodiversity enhancements.

- Old maps highlight the network of hedgerows which would have existed in the fields south of the substation. A couple of these still exist, directly south and west of the substation and with their rich concentration of wildlife must be protected and enhanced before they are lost.
- The proposed enhancements along the Belstead Brook waterway will do nothing to mitigate views given this is a low lying valley. It is also already well planted and managed.
- The whole area south of the substation, once a protected Special Landscape Area (SLA), is now covered under the Local Nature Recovery Strategy (LNRS) as either rich in biodiversity or with the potential to be. As such, it should all be included in the 'opportunities' plan, whereas it currently is not.
- No coordination or discussion with landowners south of the substation and other interested parties to hear their thoughts and plans for opportunities for biodiversity enhancement and planting. BPC are already in discussion about what is possible.
- Finally, yet again, NGET have failed to mention the proposed Alcemi/ Brunfort BESS, despite being referred to in this examination, and being of huge note to this plan in terms of potential impact and the requirement for extensive mitigation.

4. Noise.

Impacted by the cumulative effect of multiple concentrated infrastructure projects, residents of Burstall know what an impact construction and operational noise can have. In the last week, BPC have reported 2 noisy construction events both out of hours, one at 0900hrs on a Sunday and the other at 0730hrs on a weekday. Both we have been told were due to the Bramford to Twinstead project and have an enormously negative impacts on the quality of life for residents in this quiet rural area.

We would urge the ExA to ensure that all out of hours work is constrained to absolute emergencies and that the permission for emergency out of hours work is cleared at the highest level. For those living along the pylon route, the impact of the construction during working hours is bad enough, without the addition of unnecessary out of hours work.

In line with The Planning Act 2008, we urge the ExA to ensure that where cumulative impacts are most heavily felt, such as at the Bramford Substation, where they are likely to be significant, special measures and conditions must be applied. We would ask for the full range of controls to be approved, including: limiting construction hours; noise and vibration limits; active monitoring; efficient complaint procedures; regular use of quieter plant; restrictions on particularly noisy activities; advance approval of construction noise management plans; and, clear operational noise limits at identified sensitive receptors.

As well as construction noise, we would also ask ExA to be mindful of the applicant's plans for mitigating the concentration of operational noise at the Bramford Substation. We assess that cumulative operational noise will have an impact on Burstall, the amenity of the countryside and tranquil areas, such as Elms Grove, the enjoyment of quiet rural areas, wildlife, protected species and the setting of heritage or landscape receptors. We would seek the ExA to therefore request that the applicant explains how its routing, siting, design and construction methodology have had regard to the amenity of Burstall and how noise effects have been avoided, reduced or mitigated so far as reasonably possible (Electricity Act 1989).

EN-1 is clear in its support for a receptor specific assessment of both construction and operational noise, how this may impact health and quality of life, and how this may lead to enforceable and measurable DCO requirements for specific areas. BPC consider a specific assessment of Burstall, especially residences and tranquil/ historic/ well-visited amenity sites closest to the Bramford Substation, is completed and results shared.

5. Flood Risk.

BPC request the ExA to specifically request the applicant provides details on how the cumulative flood risk will be managed due to the many ongoing projects at the Bramford Substation including their planned substation extension. We request the response is specific to Burstall and focused on the following locations known for regular flooding: The Channel; Church Hill; and the A1071 junction. In addition, how increased runoff will impact existing drainage to Burstall Hall, Hall Lane and Walnut Tree Farm.

The below photo shows the existing flood risk in Burstall, taken in 2023.



6. Dark Skies.

BPC request ExA to confirm with the applicant how dark skies will be maintained given the cumulative impact from the many projects ongoing at the Bramford Substation. We request that the Bramford Substation site is specifically assessed in the Lighting Design Strategy to ensure there is no cumulative light pollution, all light when used is contained within the substation with no light spill outside, specifically around the perimeter, that use of light is tightly controlled and that the dark skies around Burstall are maintained.

BPC have, on several occasions over the last year, had to contact the BDC Enforcement team due to lights being left on overnight at the Bramford Substation site, with the spill of lights illuminating the night sky and on one occasion actually pointing towards the village (see photo below taken from Hall Lane, 1km south of the substation, showing illumination in the west of the substation at 1918 hrs on 18 January 2026). For this reason, as well as the assessment requested above, BPC would also like to see very detailed conditions and controls on the use of light at the substation.

