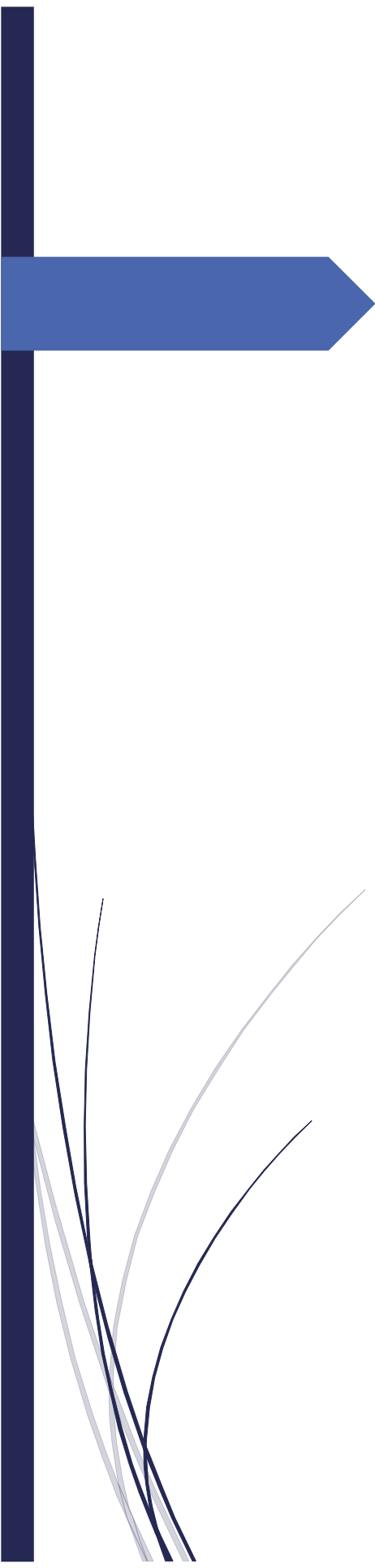




Burstall Parish Council

Closing Statement:

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

Contact Details: @burstall-pc.gov.uk

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Introduction

This is the Closing Statement of Burstall Parish Council (BPC) for the final deadline of the Norwich to Tilbury DCO Examination.

Burstall Parish is located at the southern bottleneck of development around Bramford Substation, and faces a disproportionate cumulative impact of energy development which remains largely unrecognised and wholly unmitigated in the Applicant's final submission.

BPC has participated at every stage of the DCO process, has had the majority of its submission comments either ignored or responded to dismissively rather than through a fresh review and engagement, and for the reasons that follow in this submission request that the ExA recommends **REFUSAL** of consent to the Secretary of State.

AI Statement

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.

Security and Resilience

BPC maintains that the Applicant has failed to provide the necessary evidence that would allow the ExA to conclude that Security, Resilience, and Major Accidents & Disasters (MAD) risks have been adequately assessed and mitigated across the four substations involved in the proposal.

Security risks relate to physical risks such as malicious attacks and cyber security. System resilience is the ability of the network to absorb those security risks by avoiding catastrophic single points of failure, such as the significant concentration of energy developments around and connected to Bramford substation. This single point of failure is contrary to lessons learned at the North Hyde substation incident, and security and resilience best practice. Physical security and system resilience are technically and operationally different, but they converge in the planning system. A security risk realised in a vulnerable system has the ability to create an unacceptable public safety and national security risk.

BPC and other Interested Parties have provided submissions throughout the process that highlight severe omissions in the Environmental Statement (ES) concerning security, resilience, and MAD risks.

BPC maintains that the Scoping Opinion did not scope out MAD, it merely asked the assessments be included in alternative relevant chapters, which it was not. Despite the ExA following this omission up with two specific requests for information at ExQ1 and ExQ2 - including requesting a high-level summary of consultations and highlighting the confidential route for sensitive information – no such verifiable evidence was submitted.

BPC also requested that the relevant security authorities be invited as statutory consultees, in order to confirm the Applicants claims that all relevant security assessments had been completed and at the appropriate stage of the design process. We are uncertain whether they were invited, but no submissions were entered into the Examination Library – even in a confidential format.

In order to assist the Examination BPC submitted Freedom of Information and Environmental Information Requests to various security bodies in the UK that are likely to have been consulted. The specific results are as follows (with full responses in the Appendices):

Home Office:

The Home Office are responsible for domestic security and malicious threats. They confirmed that they hold no information regarding assessments or consultations on security between them and NGET. However, they also advised that this information would be the domain of the Department for Energy Security and Net Zero (DESNZ). So we believe it is reasonable that they wouldn't hold information.

Department for Energy Security and Net Zero:

No response received before Deadline 8.

National Energy System Operator (NESO):

NESO operate the electricity network and are responsible for making sure there is enough supply to match demand, designing an electricity system that meets future needs, and planning and designing electricity networks. NESO responded late on the 4th August 2026 to advise they are defaulting on their statutory duty to reply within 20 working days, and will instead respond by the end of the week – after Deadline 8. This delay undermines the Applicants claims and eliminates the ability to provide supportive evidence to this Examination.

National Protective Security Authority (NPSA) and MI5:

The NPSA are exempt from FOI/EIR requests, but as a branch of MI5 who do consider them on a case by case basis, we attempted a submission to them instead. MI5 have not responded.

Ofgem:

This was a very worrying reply. Ofgem stated that they cannot confirm or deny that the information exists under exemption 24(2) (national security).

Our original FOI request was very carefully crafted to exclude asking for substantive detail – something that would have rightly fallen under the exemption.

Security authorities are also wary of a risk called a “mosaic effect”. Where multiple small FOI requests can be used to build up a bigger picture, that together does create a security risk – and also falls under the exemption. For this risk to apply the disclosure must reveal *new* information.

Instead we sought corroboration that the assessments and consultations had happened with yes/no answers and dates. This approach would not have revealed new information as the Applicant has repeatedly claimed these happened on the public record during this Examination. Exemptions can not legally apply to information that already exists on the public record.

Furthermore, before applying an exemption, the public body must determine if the FOI request can be partially fulfilled. For example, Ofgem could have confirmed “yes” to the questions, but attempted to reason refusal of the dates. Corroborating the existence of the assessments and consultations would not have provided new information or a national security risk, but

maybe Ofgem have a valid reason why the dates could pose a risk. Applying a blanket exemption to the entire request is unreasonable.

Lastly, reasoning must go through a public interest test. Under the Planning Act 2008, the ExA has the duty to examine an application thoroughly. When an Applicant states they have done the work, but stonewalls requests to provide the evidence, there is a significant lack of transparency. There is a public interest in ensuring: that our security authorities are actively carrying out their duties to protect public safety and national security; that our CNI is being properly assessed for security vulnerabilities. Simply confirming “yes” to our FOI request would have satisfied this without causing risks. Ofgem could not make that confirmation.

Instead, the only way new information could be provided that does provide a national security risk – and would validate the blanket use of the national security exemption by Ofgem – is if the information is not held where it should be. i.e. If the assessments were not done and if the consultations did not happen. The knowledge that they were not done as they should be would be a national security risk because it exposes a vulnerability in the design of Critical National Infrastructure and would validate the blanket use of the 24(2) exemption that Ofgem chose.

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To be clear, the Applicant has provided zero evidence to support its claims that security has been adequately assessed, nor has any independent security authority provided confirmation that security assessments and consultations have happened, let alone had a positive outcome. Even worse, the response from Ofgem infers that by revealing new

information not already claimed in the public domain, that it would highlight a national security risk. The only new information requested that could truly pose a national security risk is the *absence* of the information where it should be.

With the absence of any assessments and any documented consultations with security authorities the ExA cannot be satisfied that the environmental and safety risks have been fully identified, assessed, or mitigated. This is a significant omission because it engages three critical policies that prohibit recommending or granting consent:

- Under Regulation 4 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 the decision maker is prohibited from granting consent where the ES remains incomplete or the Examination lacks information enabling the decision maker to make a reasoned conclusion.
- Parts 4 and 5 of the NPS EN-1 require the Applicant to demonstrate robust assessment and mitigation of security and safety impacts before the planning balance can begin.
- NPS EN-1 4.1.7 states that a presumption in favour of granting consent does not apply where there are residual impacts to public safety and defence. Residual impacts cannot be understood if the original impacts have not been assessed.

BPC remain concerned that the scope of our concerns have been misinterpreted during this Examination, and that attempts to seek proper assessment and scrutiny have been continually

stonewalled. The ExA cannot reasonably assess something that they have no standards to assess against, no verifiable evidence to scrutinise, and where no external public security authority are willing to corroborate. Even at a very high summary level through confidential channels.

On this topic alone, the ExA cannot legally recommend, and the Secretary of State cannot legally grant, development consent.

Traffic

BPC notes that the Applicant confirmed the correct diversion route of SMD-C-002. However, we remain concerned that the Applicant continues to choose and recognise that the diversion route is of a lower highway standard than the proposed closed roads, yet refuses to provide evidence to support its feasibility as a diversion.

BPC has provided evidence via photographs and speed data that the chosen diversion is unsuitable for the road traffic being diverted – specifically HGVs – and that the junctions involved are unable to safely accommodate the traffic. The chosen diversion is made of unlit and uneven roads of varying widths, primarily single track roads, with unrestricted speed limits, and with junctions that are too narrow for an HGV to turn without causing damage to the verges and road signage. We understand the closures and diversion would be in place overnight, when visibility is compromised, further exacerbating the risk to public safety.

The Applicant intends to deal with this issue after consent is granted. This is legally unacceptable and undermines the purpose of the Examination in identifying and assessing the environmental impacts of the proposal:

- NPS EN-1 4.4.4 and section 5.14 clearly requires that all traffic environmental impacts be assessed prior to determination. Without the evidence that a lower highway standard of diversion is feasible for the type and number of traffic being diverted it renders the ES incomplete, prohibiting the granting of consent under Regulation 4 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.
- Attempting to defer assessment of the feasibility of the diversion route until after consent is granted is unlawful. Establishing the details of the diversion such as timing of the diversion and the traffic management in place may be deferred to a post-consent process, but the environmental impact of the diversion chosen is a requirement prior to the start of the balancing process.
- Granting consent with a Requirement that cannot legally be discharged puts an unfair burden on the Local Highways Authority. It forces the acceptance of an unsafe diversion or the submission of a change to the DCO that could have been resolved before determination.

Alternatives

BPC submits that the Applicant's assessment of alternatives remains fundamentally flawed and their dismissal of undergrounding purely on the basis of higher capital cost is unreasonable.

BPC accepts that the starting position for transmission technology around the Bramford Substation is for overhead pylons. However, this

is not an absolute rule. It is conditional on the environmental impacts and whether the residual impacts remain significant even after mitigation.

Around the Bramford Substation all visual and landscape assessments identified the residual impacts as resulting in significantly adverse visual and environmental harm. Despite acknowledging the harm to be significant the Applicant refuses to assess partial undergrounding around the substation, relying solely on cost as a barrier.

BPC acknowledges the compensation offered by undergrounding the 35m high distribution lines. Introducing 50m high pylons instead is still an increase in visual and landscape impact, and adds to the cumulative impact and wirescape around the Bramford substation and Burstall in particular.

The Applicant attempts to argue that the impacts around Bramford substation are not significant enough to justify undergrounding in this area, yet refuses to clarify what the threshold of harm is that would trigger undergrounding as a reasonable option. BPC are unsure what level of harm exceeds *Significant Adverse* – as identified for every residual effect around Bramford substation and the highest level possible in the LVIA – when the Applicant considered its cost-benefit analysis of alternatives.

The failures by the Applicant create an inadequacy in the Examination and assessment process:

- Without a defined and objective threshold of where the cost-benefit threshold is for impacts, any dismissal of the alternatives by the Applicant remains arbitrary and unreasonable.

- Cost alone cannot be the sole reason for dismissing an alternative in an area where significant adverse impacts have been identified, even when pylons are the starting position.
- Without a justified and reasonable explanation of why alternatives have been rejected in an area where highly significant adverse impacts have been identified and remain unmitigated, the ES remains incomplete and prohibits the granting of consent under Regulation 4 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.

Aside from undergrounding, the applicant has done nothing to review the routing of pylons exit from the substation, other than saying it is difficult. If the Applicant has indeed looked at alternative routing then we would expect to have seen it within the documentation, along with a reasonable explanation of why it was discounted. Simply saying it is difficult is vague and provides no insight to those without technical knowledge. With a compound already planned to the east of the substation, in ground which would work to mitigated views as well as reduce the number of pylons by 5 or 6, we are appalled at the lack of engagement. Equally, we see no evidence or any effort to move the pylon route further east, in order to avoid disruption to the significant ancient woodlands containing the Service Tree.

Construction and Operational Noise & Disturbance

BPC remain concerned that the dDCO is inadequate for managing and controlling out of hours work noise. With a constant series of

complaints being made to the B2T project – being constructed by the same applicant - the issue of out of hours work disturbance remain. Ongoing correspondence with NGET is long and drawn out with no apparent ability to account for activity in a timely manner, citing a plethora of contractors who seemingly come and go as they wish. Either the Applicant and its contractors are regular in breach of their DCO, or the DCO was insufficient to manage construction noise and disturbance out of hours. We ask the ExA if they recommend approval that the DCO has strict controls for out of hours noisy work and adequate procedures in place to identify and rectify breaches quickly.

Further, BPC are concerned that the Applicant states no cumulative impact noise report is required for Bramford substation. Substation equipment does produce an audible hum – Burstall can already hear it - and the Applicant intends to increase the equipment on site with this proposal. Noise creep is a concern in rural locations and noise is not exempt from cumulative impact. Without assessment of cumulative impact, the ES remains incomplete.

Construction and Operational Lighting

We thank the ExA for supporting our Dark Skies concerns given the many issues we have had with construction and operational lighting at and around the Bramford Substation. Whilst we note that the Applicant have stated the on-site lighting at Bramford Substation will be limited to emergency use overnight, this is meant to be the case at present, but our experience is that overnight lighting across the site is left on overnight on many occasions. The lighting is prominent on the landscape plateau, extremely bright, and impacts long distances. Either the existing planning conditions are repeatedly

breached, or they are inadequate to protect the area. We ask the ExA to ensure the DCO, if recommended for approval, includes strong protections for our dark skies.

Flood Risk

NGET's approach to flood risk in the vicinity of the substation takes no account of the increase in run off we are witnessing in the Belstead Brook and Gipping Valley drainage basins, nor does it account for the cumulative impact with other developments in the area. Without mitigation, the level of flooding will increase as a result of these works.

Biodiversity, Ecology, and Nature Conservation

BPC remain extremely concerned about the lack of meaningful landscape mitigation proposed, with no mitigation offered between the village of Burstall and the substation. Further, with no efforts to correct gaps in site inspection in this area, and many important habitats and species missing from assessments we remain concerned that there has been a massive underestimate of both the impact and the opportunities for landscape, biodiversity and nature conservation opportunities.

Further, we remain concerned that some mitigation planting is guaranteed in the dDCO for only 5 years for monitoring and replacements, yet impact assessments are based on longer.

Historic Environment

BPC remain extremely concerned about the omissions of historic features within the assessments, such as the historic sheep driving route along Cooks Lane and its links to the wider historic fabric of this landscape, and we remain concerned that there has been a massive underestimate of the impact on the historic environment.

Conclusion

For the reasons set out above, and within our previous submissions to this Examination, BPC submits that substantial environmental information is missing and the ES is incomplete. These omissions prevent the ExA and Secretary of State from adequately balancing the proposals impacts and benefits. Thus prohibiting the granting of consent.

BPC urges the ExA to recommend **REFUSAL** of the Norwich to Tilbury DCO.



Home Office

2 Marsham Street
London
SW1P 4DF
www.gov.uk/home-office
FOIRequests@homeoffice.gov.uk

[REDACTED]
[REDACTED]@outlook.com

27 July 2026

Dear [REDACTED]

Freedom of Information Request: FOI2026/09207

Thank you for your email of 4 July 2026, which we have included as Annex A. Your request has been handled as a request for information under the Freedom of Information Act 2000 (FOIA).

We have consulted with the relevant teams within the Home Office whom we believe may hold information, and we can confirm that the Home Office does not hold information relevant to your request. Given the subject matter of your request, the Department for Energy Security and Net Zero (DESNZ) may hold information. If you have not already done so, you may wish to write to them online via: foi.requests@energysecurity.gov.uk.

If you are dissatisfied with this response you may request an independent internal review of our handling of your request by submitting a complaint within two months to foirequests@homeoffice.gov.uk, quoting reference **FOI2026/09207**. If you ask for an internal review, it would be helpful if you could say why you are dissatisfied with the response.

As part of any internal review the Department's handling of your information request would be reassessed by staff who were not involved in providing you with this response. If you were to remain dissatisfied after an internal review, you would have a right of complaint to the Information Commissioner as established by section 50 of the FOIA.

A link to the Home Office Information Rights Privacy Notice can be found in the following link. This explains how we process your personal information: <https://www.gov.uk/government/publications/information-rights-privacy-notice>

Yours sincerely

Public Safety Group

ANNEX A

Under the Freedom of Information Act 2000 and/or the Environmental Information Regulations 2004, I am writing on behalf of Burstall Parish Council to request information regarding security and resilience consultations for the proposed Norwich to Tilbury (N2T) DCO by National Grid Electricity Transmission (NGET).

During the ongoing public Examination the Application (NGET) has repeatedly asserted that its design complies with established regulatory, security, and policy frameworks applicable to Critical National Infrastructure (CNI) and that they have consulted with relevant statutory bodies. However, NGET has declined to provide any detail as required by planning policy, citing security and confidentiality restrictions. The only standard they have named is NETS SQSS, but provide zero evidence to support this. This is despite the planning process having a designated route for confidential information.

Burstall Parish Council is the nearest village to Bramford substation, and we are concerned about the increasing concentration of energy development and reliance on Bramford substation as a single-point of failure and major transmission hub in the region. However, we are also concerned that this risk applies to the other three substations (Norwich Main, East Anglia Connection Node, Tilbury North) along the route.

I am requesting the following high-level administrative data:

1. Confirmation of Consultation - Has the Home Office been formally consulted by, or engaged in correspondence/meetings with NGET regarding the physical security, cyber security, or structural resilience of any of the four substations involved in the Norwich to Tilbury DCO?
2. NETS SQSS - Has NGET submitted documentation to the Home Office that evidences compliance with the SQSS standards for each of the four substations involved in the Norwich to Tilbury DCO?
3. National Risk Register - Did any risk assessments or correspondence with NGET explicitly consult on "reasonable worst-case scenarios" as outlined in the National Risk Register 2025?
4. Evidence of Regulation Satisfaction - Does the Home Office hold any correspondence indicating that it is satisfied with the adequacy of the security and resilience assessments provided to it by NGET?
5. Dates of Engagement - If any such information is held, what were the dates of this correspondence?

For clarification, this request is focused only on:

- The Norwich to Tilbury DCO,
- Correspondence relating to security and resilience of the project,
- Correspondence between the Home Office and NGET,
- Between January 2022 and the present date.

Please note, this request does not seek the disclosure of any sensitive, classified, or restricted information. I am NOT requesting:

- The contents of any risk assessments or documents,
- The substance, outcomes, or summaries of any consultations or advice given,
- Details of the vulnerabilities or mitigation strategies discussed.

I am strictly requesting yes or no responses, and the relevant dates. Because NGET has made public statements to the Planning Inspectorate regarding its compliance, there is a public interest in verifying that the administrative steps claimed have actually taken place, and we are trying to support the Examination process by obtaining this information.

RE: FOI/ EIR Request

From .Box.InformationRights <informationrights@neso.energy>

Date Tue 04/08/2026 19:09

To [REDACTED]pc@outlook.com [REDACTED]@outlook.com>

Public

REF: FOI/26/103

Dear [REDACTED],

We are writing to provide an update on your information request.

We are aware that the statutory deadline for our response is 4 August 2026. Unfortunately, we are unable to respond by the deadline and would like to apologise for any inconvenience caused.

Please be assured that we are prioritising your request and will issue our response this week.

Kind regards

Information Rights Team



Faraday House, Warwick Technology Park, Gallows Hill, Warwick, CV34 6DA



Subscribe to: [Get the latest from NESO](#)

From: .Box.InformationRights

Sent: 03 August 2026 17:57

To: [REDACTED]@outlook.com>

Subject: RE: FOI/ EIR Request

Dear [REDACTED]

Thank you for your email about your information request FOI/26/103.

Please note as your request was received on 4 July 2026 and there was a bank holiday in Northern Ireland on 13 July 2026, the statutory deadline for response is 4 August 2026. For more information on how we calculated the deadline for response, please see guidance published by the Information Commissioner on [Time limits for compliance under the Environmental Information Regulations 2004 \(EIR\)](#), [ICO](#), more specifically the section titled 'What is the definition of a 'working day'?' which explains that:



Making a positive difference
for energy consumers

[REDACTED]@outlook.com

Email: information.rights@ofgem.gov.uk

Date: 4 August 2026

Dear [REDACTED],

Request reference number: FOI2026/01212

Thank you for your email of 4 July in which you requested the following information:

"Under the Freedom of Information Act 2000 and/or the Environmental Information Regulations 2004, I am writing on behalf of Burstall Parish Council to request information regarding security and resilience consultations for the proposed Norwich to Tilbury (N2T) DCO by National Grid Electricity Transmission (NGET).

During the ongoing public Examination the Application (NGET) has repeatedly asserted that its design complies with established regulatory, security, and policy frameworks applicable to Critical National Infrastructure (CNI) and that they have consulted with relevant statutory bodies. However, NGET has declined to provide any detail as required by planning policy, citing security and confidentiality restrictions. The only standard they have named is NETS SQSS, but provide zero evidence to support this. This is despite the planning process having a designated route for confidential information.

Burstall Parish Council is the nearest village to Bramford substation, and we are concerned about the increasing concentration of energy development and reliance on Bramford substation as a single-point of failure and major transmission hub in the region. However, we are also concerned that this risk applies to the other three substations (Norwich Main, East Anglia Connection Node, Tilbury North) along the route.

I am requesting the following high-level administrative data:

1. Confirmation of Consultation - Has Ofgem been formally consulted by, or engaged in correspondence/meetings with NGET regarding the physical security, cyber security, or structural resilience of any of the four substations involved in the Norwich to Tilbury DCO?
2. NETS SQSS - Has NGET submitted documentation to Ofgem that evidences compliance with the SQSS standards for each of the four substations involved in the Norwich to Tilbury DCO?
3. National Risk Register - Did any risk assessments or correspondence with NGET explicitly consult on "reasonable worst-case scenarios" as outlined in the National Risk Register 2025?
4. Evidence of Regulation Satisfaction - Does Ofgem hold any correspondence indicating that it is satisfied with the adequacy of the security and resilience assessments provided to it by NGET?

The Office of Gas and Electricity Markets

10 South Colonnade, Canary Wharf, London, E14 4PU Tel 020 7901 7000

www.ofgem.gov.uk

5. Dates of Engagement - If any such information is held, what were the dates of this correspondence?

For clarification, this request is focused only on:

- The Norwich to Tilbury DCO,
- Correspondence relating to security and resilience of the project,
- Correspondence between Ofgem and NGET,
- Between January 2022 and the present date.

Please note, this request does not seek the disclosure of any sensitive, classified, or restricted information. I am NOT requesting:

- The contents of any risk assessments or documents,
- The substance, outcomes, or summaries of any consultations or advice given,
- Details of the vulnerabilities or mitigation strategies discussed.

I am strictly requesting yes or no responses, and the relevant dates. Because NGET has made public statements to the Planning Inspectorate regarding its compliance, there is a public interest in verifying that the administrative steps claimed have actually taken place, and we are trying to support the Examination process by obtaining this information.

I look forward to receiving your response within the statutory 20-working-day timeframe.”

We have considered your request under the Freedom of Information Act 2000 (FOIA).

We are unable to confirm or deny whether Ofgem holds the information you have requested.

Exemption

The information you requested is subject to an exemption under section 24(2) of the FOIA National Security.

Ofgem is neither confirming nor denying holding the requested information under section 24(2) of the Freedom of Information Act 2000 (national security). Confirmation or denial of this information could reveal insights relating to the physical security, cyber security, or structural resilience of the UK’s critical national infrastructure.

Ofgem considers withholding the data is required for the purpose of safeguarding national security.

In applying this exemption, we have had to balance the public interest in withholding the information against the public interest in disclosure.

Ofgem recognises that there is a public interest in transparency and in supporting public understanding of regulatory activity. However, there is a strong and overriding public interest in safeguarding national security and protecting the resilience of the UK’s critical national infrastructure.

In this case, the public interest in protecting national security and minimising the risk of disruption to essential services outweighs the public interest in disclosure. Ofgem therefore considers that the balance of the public interest favours maintaining the exemption.

Your Rights

If you are dissatisfied with the handling of your request, you have the right to ask for an internal review. You must contact us for a review no later than 40 working days after the

date of this letter. If you require an internal review, please contact us at information.rights@ofgem.gov.uk or by writing to us at 10 South Colonnade, Canary Wharf, London E14 4PU.

If you are not content with the outcome of the review, you have the right to apply directly to the Information Commissioner for a decision at:

Information Commissioner's Office
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire
SK9 5AF

<http://www.ico.org.uk/>

Please remember to quote the reference number above in any future communications.

Yours sincerely,



Information Rights Officer