

Bunwell Parish Council's response to the Planning Inspectorate - as an interested party - with regards to National Grid PLC's Norwich to Tilbury project and the proposed associated activities in the Parish of Bunwell, considering the acceptance of the project's Development Consent Order for Pre-Examination

1. Statement of opposition

Bunwell residents overwhelmingly oppose National Grid's proposals for its Norwich to Tilbury project. We, the Parish Council, therefore object to this project in its current form. The primary reason for our objection to the project in its present form is the real potential for significant and lasting harms to the village and its parishioners, listed below.

2. Alternatives to the proposals

For the transmission of power from offshore wind farms: the most acceptable option to the majority of Bunwell parishioners is an integrated offshore grid. The second most acceptable alternative is undergrounding. We ask for a full assessment of the costings of these three schemes to be given thorough scrutiny by the Planning Inspectorate.

3. Landscape quality

The presence of industrial structures in the otherwise unspoilt landscapes of Bunwell Hill and Low Common will be immensely damaging to those who live in the area and those who use it for recreation. At a local level the landscape and views are highly valued.

In supporting document 13.4.50, National Grid describes how landscape is particularly important when viewer's attention is focused on the landscape by users such as cyclists, walkers and horseriders. Bunwell Hill and Low Common are extensively used and enjoyed by these groups.

In supporting document 13.3.125 onwards National Grid describes the impact on the Tas Valley Tributary Farmland in which the affected part of Bunwell is sited. They state that the effects during the construction period are '*major and significant and of a high magnitude*' within 0.5 km of the transmission line proposed. In operation, the effects are said to be '*significant and irreversible*'. At up to 0.5 km they are '*major and significant*'. At up to 1.5 km they are '*moderate*'

*and significant*'. (Table A13.2.11). This projection is still to be the case after 15 years of operation of the project.

It appears that no screening or landscaping is proposed to counteract landscape harms. We consider both the damage to a prized landscape and the lack of any proposals for landscape mitigation to be unacceptable.

N.B. Please note that the Bunwell viewpoints published in National Grid's supporting documentation are wholly inadequate. Fig 7.12.F18\_VP1.20b gives a current view from the village hall but does not include a view with the transmission line added. Fig 7.12. F18\_VP1.20c states it is a view from the village hall when it is not.

4. Proximity to dwellings

4 x dwellings in Bunwell are to be within 200m of a pylon - 1 and 2 Banyards Hall Cottages and East and West Barns. To be this close to the transmission line is stated by National Grid to be a *'significant negative'*. However, National Grid has evaluated the settings of these dwellings and concluded that *'no instances have been found where effects on Residential Visual Amenity would be so great that they would affect living conditions and render these properties unattractive places to live'*. (Doc ref 13.6.3). Residents of these properties beg to differ.

All the residents of Bunwell Hill and Low Common (approximately 100 households) will live within 1.5 km of a pylon, with the above mentioned *'significant'* effects likely to negatively impact their enjoyment of what is otherwise unbroken, unspoilt countryside.

5. The natural environment

a) Removal of trees

46 x trees are to be destroyed by the proposed works in Bunwell. Others are to be potentially affected or affected/managed. Between RG45 and RG46 15 x oak trees, part of an avenue of 60 x oak trees leading to Grade II listed Banyards Hall, are to be removed with a further 8 x oaks to be potentially affected or affected/managed.

Also, between RG45 and RG46, off Low Common Road, 16 more trees are to be removed, with a further 4 potentially affected/managed. See Doc Ref 7.4.F1 p26.

Between RG49 and RG 50, in an area of particular ecological importance, 3 x veteran trees are to be potentially affected or affected/managed. 2 of these are in an area covered by a tree preservation order. 6 x other trees within the area covered by the preservation order are to be removed and a further 3 are to be affected or affected/managed. See Doc Ref 7.4.F1 p27.

In their supporting documentation (at 13.5.14) National Grid states that the residual arboricultural effects of the project are '*major adverse*' and '*significant*'.

b) Destruction of wildlife habitat

The loss of habitat caused by the removal of trees and hedgerows in a particularly quiet and unspoilt area of our parish will lead to unacceptable habitat loss and damage to species.

We note in supporting document 6.8.A10 Bat Activity Report that two peak areas for bats have been identified in our village between RG 49/50. These are red zones for barbastelle bats, requiring further investigation for the presence of roosts.

The proposed works at Bunwell Hill are adjacent to a county wildlife site. The area between RG49 and RG50 is subject to multiple special designations and protections and is entirely unsuitable for this project. The project as designed will do untold ecological harm. See map of this area: Doc Ref 7.4.F1 p27.

6. Heritage

The settings of 4 x Grade II listed houses - Ebenezer Cottage, Banyards Hall, Wood Farmhouse and Quaker's Farmhouse (locally known as Quaker Farm) are all considered to be impacted by the construction and operational phases of the project. During the statutory consultation period, National Grid reported the long-term effects on the settings of Banyards Hall and Quaker's Farmhouse to be a '*significant negative*'. This assessment has now been downrated to '*low adverse*', without any changes to the configuration of the project. (Doc Ref 6.11. A2). These two Grade II listed homes are to be within 250 m of the draft order limits. Their setting is to be drastically altered. No mitigation is proposed.

## 7. Harms of the construction period

### a. Noise

The working hours of the project are Mon to Fri 7.00 to 19.00 and Sat/Sun/Bank Holidays 7.00 to 17.00. Some dwellings, especially those in the proximity of RG 44-46, are extremely close to the haul road and working areas. The noise of construction traffic and works - in what is currently a completely tranquil rural setting - will be highly significant, with serious potential for harm to the health and wellbeing of residents.

### b. Traffic disruption

The network of small roads in Bunwell Low Common is to be significantly affected by the proposed works because the haul road is to cross these roads in two places. Low Common Road and Tabernacle Lane are to be subject to closure during the works. The extent of these closures is not apparent, but to close these two roads in any significant way - especially if both are closed at the same time - will prevent residents of Low Common accessing the B1113, and local amenities such as the school, church, village hall and village store. The diversion routes shown in National Grid's supporting documentation will lead to significantly longer journeys and associated inconvenience. Furthermore, in periods of heavy rainfall these diversions are not suitable as they lead over unbridged river crossings which are often impassable. This is a significant concern.

### c. Highway safety

The roads in Low Common allocated for diversion - Hall Road and Low Road - are especially narrow, with steep banks, blind bends and few, small passing places. They are used extensively by walkers, dog walkers, cyclists and horseriders - including groups of children riding from Hot to Trot Equestrian (Low Road). These roads are currently little used by vehicles. Additional vehicles on them will put the aforementioned groups at risk, especially when footpath closures (see information below) will force recreational walkers and dog walkers onto the road network.

### d. Curtailment of leisure activities

6 x Bunwell footpaths are to be subject to temporary closures - FP8, FP10, FP12, FP14, FP17, FP18. Stated periods are for up to a month, or in the case of the haul road, *'for the duration of the works'*. Supporting doc 7.6 Table 8.3 refers. During these temporary closures residents in the hamlets of Low Common and Bunwell Hill will lose access to almost all their available footpaths. Because of the location

of haul roads, they will essentially be cut off from accessing the remainder of the village by foot - including the school, church, village hall and playground. This is an unacceptable scenario.

8. Mitigation

Should the project be accepted by the Planning Inspectorate, we ask that National Grid and its contractors work with Bunwell Parish Council, our District and County Council, farmers, other local businesses, bus companies (including school bus contractors) and the residents of Bunwell to minimise the disruption of its activities.

Additionally, we ask for a comprehensive programme of landscape mitigation.