

National Grid's Norwich to Tilbury Grid Upgrade **Bunwell Parish Council Pylon Working Group**

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Background and Summary of Project Proposals

National Grid is proposing a 184 Km run of 50m pylons from Norwich to Tilbury as part of the government's plan to net zero by 2050. The demand for electricity will increase substantially over the next 20 years as gas boilers are phased out and new-build houses install heat pumps powered by electricity. Petrol and diesel cars will also be phased out, replaced by electric vehicles. The proposed pylon route will take energy from new North Sea wind farms, principally to the South East and particularly London.

The proposal sites 6 pylons in Bunwell Parish, in the hamlets of Bunwell Hill and Low Common. At 50m high these will be visible across at least 5 miles. Pylons are to be positioned in close proximity to dwellings in our parish, including listed buildings.

See the route here:

<https://norwichtotilburymap.nationalgrid.com/>

Each new pylon site will need access by construction machinery, so haul roads are to be built across farmland, crossing our small network of roads. These are to be 8 metres wide, with a vegetation clearance requirement of 20m. The haul road across one landowner's 700m field is estimated to need around 2520 cubic metres of topsoil removed, to be replaced with 7000 tonnes of hardcore, representing at least 350 lorry loads.

Each pylon will need a large working area, also created out of hardcore

In addition, National Grid plan to put settlement ponds in open farmland at Low Common because of drainage issues resulting from their work

The granite required for the construction is not available locally and consequently there will be thousands of heavy lorry movements across our wider area and locally, estimated at 150 a day. The work will take place over approximately 4 years, with a planned start date of 2027.

The need to upgrade the energy transmission network and to work towards the legally binding target of zero emissions by 2050 is appreciated. However, the level of harm to Bunwell and its residents from the pylon proposal is extensive and wholly unacceptable, especially when there are alternatives to pylons which would do far less harm.

National Grid themselves identified in a 2020 report that an offshore grid would be a cheaper strategic alternative. The ESO 'Review of East Anglian Transmission Options March 2024' identified alternatives to pylons. The onshore HVDC cabling option scored well.

Recommendation to Bunwell Parish Council Meeting Wednesday 5 June 2024

It is recommended that Bunwell Parish Council opposes National Grid's proposals, as the magnitude of harm caused to the parish and parishioners is not acceptable. An alternative solution must be found.

National Grid have themselves refer to the harms to Bunwell Parish's landscape, views and heritage assets as '*significant (negative)*' and '*significant negative effect*'

It is recommended that Bunwell Parish Council supports the alternatives:

1. First preference - a fully integrated offshore grid
2. Second preference - HDVC from Norwich to Tilbury, either underground or subsea

In the event that the Norwich to Tilbury project gains approval without either of the above, it is recommended that Bunwell Parish Council seeks:

1. Undergrounding for that part of the route which passes through Bunwell Parish, based on its character landscape features - in particular being sited in the Tas Valley -, proximity to dwellings and the damage to the setting of designated heritage assets
2. Minimising ecological damage to the part of the pylon run in Bunwell Hill, near to the Tas River - whether that be by undergrounding or adjustments/alterations to pylon siting, based on the ecological sensitivity of this particular location and the wildlife protections which are in place

Or in the event that no undergrounding can be achieved, it is recommended that Bunwell Parish Council seeks mitigation as follows:

1. Lower height pylons - to reduce adverse effects on landscape features and the settings of designated heritage assets and other residential dwellings close to the pylon run
2. Minimising ecological damage to the part of the route in Bunwell Hill, near to the Tas River, by adjustments/alterations to pylon siting, based on the ecological sensitivity of this particular location and the wildlife protections which are in place
3. A programme of planting and screening for the route of any pylons through the Parish, to mitigate the impact of their intrusive height and to compensate for habitat loss, by the implementation of a Biodiversity Net Gain project that will benefit the local community

Proposed Feedback Submission to National Grid

OBJECTION TO THE SCHEME

National Grid's Norwich to Tilbury pylons proposal is deeply damaging to the communities of Bunwell Hill and Low Common, hamlets of the larger village of Bunwell in South Norfolk.

While accepting the need to move power from the North Sea to London, Bunwell Parish Council objects to the National Grid Norwich to Tilbury pylon proposal, based on the harm it would cause to residents, heritage, landscapes, farming, property values, businesses, recreation, wildlife and the environment.

This is on the basis of the arguments set out in this submission and in earlier consultation responses and by the Essex, Suffolk, Norfolk Pylons action group, whose submissions, including to this Statutory Consultation, we endorse.

The consultation has been, and remains, inadequate; valid alternatives have not been presented and the harm of National Grid's preferred solution significantly outweighs the benefits. Alternatives that we support are:

- A fully integrated offshore grid

Or

- HVDC from Norwich to Tilbury, either underground or subsea.

BUNWELL PARISH SETTING

Bunwell is a parish of two halves, separated by the turnpike road, B1113. To the north is the main village and this is largely surrounded by modern field systems. To the south of the turnpike is a landscape that has retained much of its historical character and is a mixture of ancient woodland, enclosed field systems and areas with a surviving ancient Medieval field pattern. The fields, cottages and farmhouses are linked by narrow, often "sunken" lanes, unchanged in centuries, and these ultimately lead down to the River Tas, which they cross via unbridged fords.

The village name is Old English, meaning 'spring with reeds, reflecting the present day marshy fen-like land marking the boundary between Bunwell and the parishes of Tibenham and Carleton Rode, where the River Tas originates.

Key Points of Relevance:

- This southern part of the village, in the Tas Valley hamlets of Bunwell Hill and Low Common, is where the ancient character of Bunwell has been retained. This is where Bunwell's pylons are planned to go
- Pylons are to run between two of the three most ancient and historically significant manors of Bunwell - Perishall (now Persehall) and Banyards, Grade II listed buildings - at a distance of 440m and 220m respectively from the draft Order Limits

- Pylons are to continue on to the marshy fen at the boundary of Tibenham and Carleton Rode - the very source of the name of Bunwell village and an area that is undisturbed and rich in habitats and species

HARM CAUSED BY THE PROJECT

PROXIMITY TO HOMES AND BUSINESSES

The pylon route as proposed cuts through two communities with 102 dwellings and an estimated population of 255. This is not open farmland, it is a rural residential area. All 47 dwellings at Bunwell Hill and almost all the 55 dwellings at Low Common are within 1km of the pylon run.

Pylons are proposed within 500m of approximately one third of all dwellings in Low Common and approximately half of all dwellings in Bunwell Hill. The closest pylons to dwellings are at Low Common, at 150m distance from Banyards Hall's cottages.

There is an extremely large permitted development zone around pylon RG046, which is only 60m from two barn conversions, West and East Lodge. The impact on these properties, which are to have a pylon sited 200m away, is hugely damaging.

All residents in Bunwell and Low Common expressing an opinion to the Parish Council and to members of their delegated Pylon Working Group strongly oppose this project.

The value of homes in these two communities will be negatively affected to a considerable degree, especially as they are rural dwellings which are more impacted by the introduction of industrialisation than those in urban areas. The combined loss in value for homes in Bunwell Hill and Low Common is projected to be several million pounds. No compensation is available to homeowners.

There is an AirBnB at Hoggs Barn, Low Common, approximately 300m from the pylon run. The owner projects that bookings will be hard hit - especially through the construction period, as potential customers will have to be advised of the works taking place.

There is an equestrian business, Hot to Trot School of Equitation, within approximately 800m of the pylon run. This business uses the quiet rural roads in the region of the draft Order Limit on a daily basis. This business uses grazing land within 250m of the draft Order Limit. Hot To Trot will not be able to use local roads for hacking during the duration of the construction because of the negative effect on the horses of construction noise and activity.

Bunwell Parish Council notes that no local businesses have been recorded or reported on in National Grid's documentation supporting this consultation, which is an omission.

Bunwell Parish Council asserts that the impact on homeowners and businesses in this location is unacceptable and an alternative solution must be found.

HERITAGE

National Grid's Preliminary Environmental Information Report (Vol 3, part 3 of 4) has identified that there are 14 listed buildings within Bunwell parish which are 2km or less from the project's draft Order Limits.

Pylons at 50m high will be visible from the setting of all these listed buildings.

Of these, the setting of 4 will be subject to an especially negative effect, according to National Grid's own analysis:

- Grade II listed Ebenezer Cottage 520m north-west of the draft order limits. *'The Project would introduce tall infrastructure within the setting of the asset, causing a minor change to the rural aspect of the asset's setting, which makes a minor contribution to its value', 'There is no suitable mitigation to reduce this effect' Resulting in a 'Non Significant Negative Effect'.*
- Grade II listed Quaker Farm and its curtilage listed barns,, 210m south-east of the draft Order Limits" *The Project would introduce tall infrastructure within the setting of the asset, causing a moderate change to the rural aspect of the asset's setting, which makes a minor contribution to it's value', 'There is no suitable mitigation to reduce this effect' Resulting in 'Significant Negative Effect'.*
- Grade II listed Banyards Hall, 220m north-west of the draft Order Limits. One of the original manor houses of ancient Bunwell with the remains of its medieval moat to the west, north and east. *'The Project would introduce tall infrastructure within the setting of the asset, causing a moderate change to the rural aspect of the asset's setting, which makes a moderate contribution to its value', 'There is no suitable mitigation to reduce this effect' Resulting in 'Significant Negative Effect'.*
- Grade II listed Wood Farmhouse 350m north west of the draft Order Limits. *'The Project would introduce tall infrastructure within the setting of the asset, causing a minor change to the rural aspect of the asset's setting, which makes a minor contribution to it's value', 'There is no suitable mitigation to reduce this effect' Resulting in a 'Non Significant Negative Effect'*

It is noted that in the 'Preliminary Environmental Information Report, Volume 1, Main Text 11.8.15' National Grid states:

'these permanent effects would be caused by the presence of the overhead line alignment....and in some cases views, of these assets. For these assets this change would affect an element of their setting that makes a notable contribution to their value. At this time no suitable additional mitigation for these effects has been identified. The height of the proposed pylons means that visual screening is not always effective and may in itself cause negative effects to the settings of heritage assets"

It is unacceptable that the settings of two listed properties in a historic area of Bunwell are to incur a *'Significant Negative Effect'*, and a further two are to incur the lesser *'Not Significant Negative Effect'*, which, at National Grid's own admission, cannot be mitigated.

The setting of Grade II listed Persehall Manor, with its remains of a medieval moat is said not to extend to the draft Order Limits. However, at only 440m from the pylon run its setting is undeniably altered by the project.

Furthermore, National Grid's Heritage walkover identified and photographed the tree lined avenue leading to Banyards Hall as an 'Unrecorded Heritage Asset';

'The old avenue to the moat site, where the Banyards Hall 91373609 is located was visible during the walkover' 2.1.51 Plate 49.

A pylon is to be sited adjacent to this avenue and it is proposed to take out 50% of these oak trees to create a visibility splay for the corresponding haul road.

In addition to the individual harms described above, the proposed pylons are to have a cumulative effect on the heritage of the ancient hamlets of Low Common and Bunwell Hill, in which there are a high number of listed buildings, barn conversions, farmhouses and cottages and no modern development of any kind.

Bunwell Parish Council conclude that National Grid's proposals in their current form do significant and lasting harm to the valuable heritage of the area.

It is also deeply harmful that the proposed pylon route bisects the two remaining part moated ancient manors of Persehall Manor and Banyards Hall.

ARCHAEOLOGY

The Bunwell Parish Records held by the Norfolk Historic Environment Record (NHER), document the historic finds from the Parish. These records, covering Palaeolithic times through to the modern era, have been accessed and reported on by National Grid in their Document Library.

The number of finds in and around Bunwell Hill and Low Common is extensive. However, this NHER Parish summary is only an overview of the large amount of information held for the Parish and only selected examples of sites and finds in each period are presented. The true volume of archaeological finds within the Parish is therefore much greater than that presented by National Grid in their document library.

The area to the South of the B1113 is an area rich in archaeological finds, dating from every period of human occupation, due especially to this part of the Parish being so near to the river. The earliest evidence of humans in Bunwell is a large Paleolithic flint flake, found near Banyards Hall, close to where pylons are to be sited. Also found at Banyards Hall was a Bronze Age metallic hoard, donated to Norwich Castle museum. A possible Roman shackle was found near to the proposed pylon RG46. There is also an unexcavated Roman villa lying between the proposed pylon RG45 and the river. During the course of National Grid's recent surveys, a potential tumulus was identified on meadowland at Bunwell Hill, close to the pylon route,

The heavy clay soils of the area do not lend themselves to revealing crop mark evidence of occupation, so settlement activity is likely under-reported. Bunwell PC asserts that this is an area rich in unexplored ancient history and that the building of haul roads and pylon bases in this environment is ill-considered and likely to do harm. Should the proposals in their current form go ahead, Bunwell Parish Council requests the presence of archaeologists when excavation is to take place.

ENVIRONMENT, HABITAT & SPECIES

Being rural and undeveloped, with little traffic, noise or light pollution, Bunwell Hill and Low Common are havens for wildlife.

Bunwell Hill

In the area between pylons RG048 and RG050 and immediately above the Tas River tributary there is a particularly undeveloped and unspoilt area, inaccessible by public road and home to:

- a substantial County Wildlife Site with a large spring fed lake
- a 3 acre overstood hazel coppice woodland/rewilding site
- a private nature reserve
- an ancient right of way (Cow Lane), with veteran trees and ancient hedgerows
- a grazing meadow, bordered by mature and veteran oaks

The land here retains the small field system of medieval farming, which is a rare remnant in Norfolk.

The Tas River is a chalk bed stream, one of only 200 or so in the world. The source of the Tas River is close to this location.

The ecological value of this area has been recognised and there are additional protections on and around it:

- It is in the impact zone of a Site of Special Scientific Interest, Aslacton Parish Land.
- It is designated by DEFRA as Priority Habitat Inventory - Coastal and Floodplain Grazing Marsh and Priority Habitat Inventory - Lowland Fen
- It is immediately above the TAS Valley Environmentally Sensitive Area (ESA) and the Tas River flood plain.

On NG's current plans, the development consent area encroaches on the County Wildlife Site and the power lines will oversail the CWS. NG identifies the harm to this site in its Table 8.9 Local Non Statutory Sites Designated for Biodiversity:

'Brick Kiln Lane, Bunwell Hill

Potential Impact Pathway - Direct: Habitat loss/fragmentation as a result of overhead line installation and maintenance activities

Potential Impact Pathway - Indirect: Construction pollution (e.g. noise/vibration/air quality/dust/light/visual); hydrological connectivity to the draft Order Limits'.

The project proposal also entails the building of a haul road across a large portion of a grazing meadow which is Priority Habitat Coastal and Floodplain Grazing Marsh. Being marsh land, this meadow is entirely unsuitable for heavy construction equipment without substantial reinforcement.

This part of the project (clearance for haul road and overhead installation) will require the removal of a significant amount of mature hedgerows and scrub; plus boundary trees - mainly oaks, but with some alder, ash, field maple, hawthorn, hornbeam and willow - ranging in age from an estimated 40 years to 600 years; plus approximately an acre and a half of overstood hazel coppice woodland/rewilding site which has signs of Badger habitation in the form of latrines.

To be removed, most notably:

- A whole row of ancient boundary markers, including veteran oaks with very high ecological value
- A separate field boundary, including an old field maple and an ancient ash coppice stool

Also at risk from the development, as within the draft Order Limits:

- A particularly valuable veteran oak with a perpetual European Honey Bee population.

The total number of mature boundary trees in the draft Order Limits and therefore at risk is 49, of which 27 are mature and veteran oaks.

Bunwell Parish Council is aware of various wildlife surveys taking place on this area of land. We understand that those surveys have not yet been concluded. Norfolk Wildlife Services records show this area to be home to multiple species, including some which are protected and endangered.

A large number of species have been recorded by landowners, which include:

Mammals, Reptiles, Amphibians:

Red deer, Fallow Deer, Roe deer and Muntjac

Badger, Fox pair (dog and vixen), Rabbits, Brown Hare

Vole, Wood Mouse, Shrew, Mole, Stoat, Weasel, Rat

Bats - 4 different species

Grass Snake, Common Toad, Common Frog, Palmate Newt, Common Newt.

Harvest Mouse * *Mammal Red List

Birds:

Barn Owl, Tawny Owl, Little Owl.

Buzzard, Kestrel, Hobby, Red Kite, Sparrowhawk

Green Woodpecker, Greater Spotted Woodpecker

Nuthatch, Tree Creeper

Blue Tit, Great Tit, Long Tailed Tit

Goldfinch, Chaffinch, Bullfinch, Firecrest, Chiffchaff

Blackcap, Dunnock, Robin, Wren, Song Thrush, Blackbird, Swallow, Magpie, Jay, Crow

Grey Heron, Egret

Collared Dove, Pigeon, Pheasant, Partridge

Cuckoo*, Skylark*, Fieldfare*, Willow Tit*, Greenfinch*, Swift*, Starling*, Yellowhammer*,

House Sparrow*, Tree Sparrow*, Turtle Dove* (2022)

*BTO (British Trust for Ornithology) Red List species. 11 Red List bird species identified

Butterflies:

Swallowtail (2021)

Red Admiral, White Admiral, Peacock, Tortoiseshell, Painted lady, Comma, Speckled Wood, Ringlet, Purple Hairstreak, Gatekeeper, Small Copper, Common Blue, Holly Blue, Brimstone, Orange Tip, Meadow Brown, Small White.

(Swallowtail and White Admiral butterflies are listed as vulnerable).

Moths:

Elephant Hawk Moth, Cinnabar, Six Spot Burnet and others

Flora:

Early purple orchid, Common spotted orchid, Bee orchid, Pyramidal orchid
Bluebell, Ramson, Celandine, Dog violet, Cowslip, Oxeye daisy, Pignut, Gipsywort, Stitchwort, Red campion, Bladder campion, Knapweed, Field scabious and others

In addition, the presence of construction vehicles in this setting, along with associated construction equipment, will inevitably generate pollution. This will naturally drain into the Tas River Valley, potentially polluting water that flows into the Aslacton SSSI to the East. The field in question has drainage pipes underneath it that lead directly to the River Tas.

For the above reasons, Bunwell Parish Council categorically rejects that this is an environmentally suitable location for pylons or a haul road. To introduce them into this historic and ecologically sensitive environment would be immensely damaging. Moreover, all the land in this area has some level of ecological protection on it. The problem cannot be solved by moving the pylons or the haul road to the left or right.

Low Common

Between pylon RG045 and RG046 it is proposed to take out half of an avenue of 60 mature oaks at Banyards Hall to allow a visibility splay for the haul road which bisects the avenue.

Significant areas of mature hedgerow are also to be removed to enable the building of haul roads. One landowner estimates the amount to be removed at 400m.

Low Common's hedgerows, wooded areas and ponds are also home to an extremely diverse range of wildlife, including birds on the BTO Red List and a documented population of Great Crested Newts.

LANDSCAPE

Bunwell Hill and Low Common are located in the Tas Valley. The Tas River itself originates in a spring close to Bunwell. Bunwell's name means 'spring with reeds'

South Norfolk's Development Plan 2023 says of Bunwell: *'The village is a series of dispersed groups of dwellings. The village at Bunwell Street is set in predominantly flat open countryside. This contrasts with the clusters of development at Low Common and Bunwell Hill, which are set in the Tas Valley'*

This is not open farmland. It is a pastoral landscape which has remained largely unchanged for centuries. National Grid's proposal would do huge harm to this gentle and rolling vista.

National Grid's own Heritage and Archaeological surveys which support this consultation both site Bunwell Hill and Low Common in the Tas Valley.

In 2023, National Grid responded to a consultation response about protecting the Tas Valley as follows:

'Through routeing and siting National Grid has sought to and will continue to seek to reduce as far as practicable the impact to the Tas Valley. We will continue to consider factors that have the potential to impact the Tas Valley such as landscape character and amenity value, as we develop our proposals and seek to reduce effects. Measures to reduce such effects can include the use of underground cables in the areas of highest amenity value, sympathetic siting of infrastructure and pylons, and where necessary a range of planting for the purpose of screening'
ref 3.11.61 National Grid June 2023

However, there is no evidence that the landscape status and qualities of Low Common and Bunwell Hill as part of the Tas Valley have been recognised by National Grid. At no point in any of the supporting documentation is any mention made of this status, nor have any protections been put in place as described above..

Additionally, National Grid's proposals for Low Common and Bunwell Hill have been made without reference to the detail of the relevant Landscape Character Assessments for South Norfolk.

This assessment puts 4 of Bunwell Parish's pylons, RG43 and RG46-48, in Tas Valley Tributary Farmland *' a landscape of gentle slopes leading down to shallow tributary valleys'*.

This landscape categorisation specifically identifies the harm that pylons would do:

'Gently sloping topography and open landscape making this area sensitive to intrusion by tall and large elements, including large farm buildings and pylons,

The remaining 2 pylons RG044 and RG045 are in Ashwellthorpe Plateau Farmland. Banyards Hall is specifically mentioned in the landscape character assessment - *'Halls and associated moats e.g. at Banyards Hall'*. A specific development consideration in this landscape character assessment is to *'maintain the setting of halls'*:

Pylons will be highly visible for all road users in the vicinity, especially for those travelling to and from Fornsett to Low Common and to and from Low Common to Bunwell Hill.

Pylon RG046 at Low Common will be especially visible to road users, with no screening when approaching from Bunwell Hill and a long view when travelling up the hill towards Bunwell Hill.

This pylon is close to the edge of Low Common Road. It is understood that this is to be a tension pylon, with heavier steel and an additional element of visual intrusion.

There will also be an impact on visual amenity for residents in other parts of Bunwell parish, as 50m pylons will be highly visible in the relatively flat landscape north of the pylon run, especially from the B1113 and village hall and playground.

National Grid have extensively evaluated the visual and landscape impacts of the project, as seen in their document library. These are desktop exercises and do not properly identify the unique elements of Bunwell Hill and Low Common's landscapes. There is no recognition at all of the medieval field structure and ancient landscape leading to the River Tas, where pylons and a haul road are to be sited.

The evaluations which have taken place recognise a generic visual and landscape impact on those parts of Bunwell Hill and Low Common within 1km of the pylon run to be '*significant (negative)*' .

Bunwell Parish Council consider the introduction of pylons as proposed to be a despoiling of a unique and valuable landscape, which is unacceptable when alternatives exist.

TRAFFIC

The small roads and lanes through Bunwell Hill and Low Common have remained unchanged for centuries. They are all single track roads, originally used by horse and cart, with few passing places. In Low Common a number of the roads are steeply banked.

These roads are not suitable for heavy construction traffic. Bunwell Parish Council notes that it is intended to use haul roads up and down the route for construction traffic. Bunwell Parish Council seeks assurances that, should this proposal go ahead, all construction traffic and associated traffic would be prevented from using local roads.

Bunwell Parish Council is very concerned about the crossing of heavy goods vehicles across the public road between RG045 and RG046. This road is the main access road into and out of the Low Common community. Any closure of this road will be problematic for residents, especially during exceptionally wet weather, when all other routes to and from Low Common can be made impassable because of the presence of forded bridges and flood water. When these fords are impassable this is the sole route out of the community for most residents.

Bunwell Parish Council is also concerned about the use of Brick Kiln Lane. It is understood that a resident has received written assurances that Brick Kiln Lane in Bunwell Hill, a RUPP (Road Used as a Public Path) and marked on National Grid plans in red is not to be used for construction traffic during the development. However, afterwards - during operation - it is to be used for maintenance access. This is a very narrow residential road and a 'green lane'. The latter part of the lane is unmade and usage is restricted to landowners only, who access it solely by quad bikes and a pick up truck for taking feed to livestock. This lane in its current form is not suitable for use by other vehicles.

PUBLIC RIGHTS OF WAY

Information provided by The Ramblers Association identifies 6 public footpaths in Bunwell Hill and Low Common which are to be affected by the project.

These are Footpaths 8, 10, 12, 14, 17 and 18. This is a high number of footpath closures for such a small community.

The proposed haul road development would cut through and close Cow Lane FP17, an ancient footpath used for centuries by the people of Bunwell to get from Bunwell Hill to Low Common. This footpath has been in recorded use since at least the 1700s and is in constant use today by dog walkers and ramblers.

Footpath closures will prevent access to two designated long distance walks: the Tas Valley Way, and the Via Beata, The building of a haul road crossing the River Tas is especially damaging as it will render inaccessible the footpath along the Tas that both these routes require.

Bunwell Parish Council asserts that the restrictions on these Rights of Way, for a period estimated at four years, is an unacceptable revocation of the rights of residents and ramblers.

AGRICULTURAL LAND

The three landowners who are required to host pylons on their arable land in Bunwell Parish and a fourth who is required to host a haul road on his grazing land all oppose this project.

- Placement of pylons as planned will harm their ability to farm the land effectively. For one land owner, 25 of his 45 acres will be out of use during the project.
- The land used for haul roads will take decades to fully recover - it will no longer drain naturally
- Farmers are concerned that proximity of pylons will affect use of GPS systems on farm machinery
- Pylon RG045 blocks the farmer's access to that particular field. In the non-statutory consultation this landowner asked for RG045 to be positioned differently but this has not been actioned
- Drainage ponds are to take up further land - the relevant farmer does not understand the need for them
- The compensation being offered to landowners is insufficient

RECREATION

Being tranquil and scenically beautiful, this area of Bunwell is used extensively for recreation, both by residents and by others from outside the parish. The following groups, who use the area for recreation, will be adversely affected for the duration of the construction:

- Ramblers and dog walkers - including Duke of Edinburgh Award candidates - who use the small road network and the public rights of way will not be able to access footpaths.

They will need to use public highways instead and will be put at risk, especially if there is to be additional traffic resulting from the construction.

- Balloonists, gliders, microlights and light aircraft, which frequently fly in this this area, are likely to be restricted in their use of the skies because of the proximity of pylons
- Horse riding will be restricted, especially due to noise and additional traffic during the four year construction period. The small and quiet lanes in Bunwell Hill and Low Common are used extensively by horse riders, both independent riders and those from Hot To Trot School of Equitation, approximately 800m from the draft Order Limits. Local horses are not accustomed to noise and will not be able to be on roads near construction areas, thus closing off most of the options available for hacking.

BREACHES OF HOLFORD RULES

Bunwell Parish Council believe there to be 4 breaches of Holford Rules:

1. *Choose routes which minimise the effects on the setting of areas of architectural, historic and archaeological significance.* Breach: 'Significant negative' impacts on designated heritage sites are apparent and admitted
2. *Choose tree and hill backgrounds in preference to sky backgrounds.* Breach: Sky backgrounds have been chosen
3. *Protect existing vegetation, including woodlands and hedgerows* Breach: There is to be significant destruction of trees and hedgerows, including mature and ancient hedgerows and veteran oaks in areas of woodland
4. *Avoid routing close to residential areas as far as possible* Breach; Pylons are coming through the residential hamlets of Low Common and Bunwell Hill, within 1km of close to 100 dwellings and are to be within 150m of some dwellings

MENTAL HEALTH

Feedback from residents to Bunwell Parish Council indicates that the mental health of residents will be adversely affected both during and after the project. In fact mental health is already adversely affected, in that these proposals in themselves are a huge source of worry to residents for their financial and emotional impact.

Factors causing mental health issues to Bunwell residents include:

- Devaluation of property, estimated by property professionals at 25-35% for those living closest to infrastructure
- Lack of compensation for loss of property value and/or business income
- Concerns about inability to sell property, during the construction and once the infrastructure is in place

- Introducing construction noise into an area of extremely quiet and unspoilt countryside - this being potentially between the hours of 07.00 to 19.00 weekdays and 08.00 to 17.00 at weekends.
- Introducing traffic noise, including HGVs, into an area of extremely quiet and unspoilt countryside
- Introducing construction lighting into an area which has minimal light pollution .
- The loss of visual amenity to a population who have chosen to live in the countryside for it's natural beauty

The project as it stands is highly damaging to the mental health of residents of Bunwell Parish.

We note from the project's supporting documents that National Grid has chosen not to assess or quantify the impact on the health and well-being of those affected. We consider this to be an important omission in the consultation:

'The response of local communities to the landscape and visual aspects of the Project are subjective. Negative health and well-being effects are likely to be experienced by a proportion of the local population as a result of how the Project may affect the setting of homes, businesses and/or culturally or ecologically important community assets. A further proportion of the local population are likely to have either neutral or positive perceptions of the Project. Therefore it is difficult to conclude an overall significance on health and wellbeing of landscape and visual effects during the operation (and maintenance) of the project' National Grid 2024

CONSULTATION

Bunwell Parish Council does not consider it has been consulted in a way that is open, fair or transparent.

Bunwell Parish Council has identified the following deficiencies in National Grid's consultation process:

- Bunwell Parish Council and its residents were not consulted when the proposals were at a formative stage. The route was predetermined. The decision for pylons was also predetermined. This is wholly against the Gunning Principles.
- Information on the proposals has been inaccessible:
 - The maps sent to householders are large scale area maps, generic and lacking in detail
 - Information has only been sent to householders within 1km of the pylon line, when the visual impacts of the project are far wider
 - The interactive online map does not show homes other than listed buildings.
 - Internet access is required to fully access the proposals and their supporting information

- The Public Consultation/Information Events have been held in locations inaccessible by public transport and open between 1pm to 6pm only, excluding many working people
 - The supporting documents on NG's website are not labelled or indexed in a way that makes them straightforward to access. It seems that information is being deliberately obscured.
- Staff at the consultation/information events have not had the necessary knowledge to respond to queries. Parishioners report evasive answers and being given different answers to the same question by different NG staff. For example, on the subject of pylon height and type, three different answers were given to the same person.
- The accuracy of the maps available for consultation has been questioned. A Bunwell landowner agreed different positions for pylons on his land with Fisher German which were to be put to National Grid. These are not the positions shown on the maps available for consultation. When questioned about this, NG staff - including Simon Pepper, Project Leader - said that the maps were printed well before the consultation date and therefore may not reflect recent changes. It is wholly unsatisfactory if residents are not being consulted on the most accurate or up to date version of the route.
- A local resident who lives close to the pylon run feels that the individual negotiations between Fisher German and landowners, the content of which is not made public to those who are affected, are not open and transparent. At these meetings, landowners who attended were not allowed to copy, photograph or record any content of the meetings
- There has been no personal engagement with homeowners who are gravely affected. Homeowners do not feel the issues they have raised in feedback to previous consultations have been addressed. Homeowners seek personal engagement given the life changing impact of these proposals
- The impact of the proposals on property prices has not been assessed. This is an important omission in the process
- National Grid has made no attempt to assess the impact of the proposals on mental health and well being. This is an important omission in the process
- National Grid do not seem to be aware of the presence of businesses in the area and have not assessed the impact upon them
- National Grid do not appear to have recognised that Low Common and Bunwell Hill are in the Tas Valley and, as such, merit special consideration

- Residents have not been consulted on pylon type. National Grid appear to have made their own subjective decisions not to pursue pylon types other than 50m lattice towers. Bunwell PC notes from NG's supporting documents that for Tacolneston to Shelfhanger, T-pylons are potentially suitable and would reduce pylon heights by 15m. It is stated that *'the reduction in height would be beneficial in helping to screen and filter views of the T-pylons'*. It appears, however, that this option has been discounted by NG without the potential for further consultation. It is also noted that lower height lattice pylons could be an option. Bunwell Parish Council requests the opportunity for consultation on these alternative pylon types

CONCLUSION

Bunwell Parish Council believes that the magnitude of harm to the parish and parishioners as described above is not acceptable and an alternative solution must be found.

Bunwell Parish Council notes that National Grid have themselves referred to the harms to its landscape, views and heritage assets as *'significant (negative)'* and *'significant negative effect'*

1. Bunwell Parish Council's first preference is for a fully integrated offshore grid. This would avoid all the above harms to the parish, its residents and its wildlife
2. Bunwell Parish Council's second preference is for HDVC from Norwich to Tilbury, either underground or subsea. This would avoid much of the longer term harms to the parish and its residents.

In the event that the Norwich to Tilbury project gains approval without either of the above, Bunwell Parish Council seeks:

1. HDVC Undergrounding for that part of the route which passes through Bunwell Parish, based on its character landscape features - in particular being part of the Tas Valley - proximity to dwellings and the damage to the setting of designated heritage assets
2. Minimising ecological damage to the part of the route in Bunwell Hill, near to the Tas River, whether that be by undergrounding or adjustments/alterations to pylon siting, based on the ecological sensitivity of this particular location and the wildlife protections which are in place

Or in the event that no undergrounding can be achieved Bunwell Parish Council seeks mitigation as follows:

1. Lower height pylons - to reduce adverse effects on landscape features and the settings of designated heritage assets and other residential dwellings close to the pylon run.
2. Minimising ecological damage to the part of the route in Bunwell Hill, near to the Tas River, by adjustments/alterations to pylon siting, based on the ecological sensitivity of this particular location and the wildlife protections which are in place

3. A programme of planting and screening for the route of any pylons through the Parish, to mitigate the impact of their intrusive height and to compensate for habitat loss, by the implementation of a Biodiversity Net Gain project that will benefit the local community

June 2024