

Submitted by email to:

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Campaign for National Parks response to the North West Coast Connections consultation, *Proposed Route Alignment Stage - 2016*

Introduction

The Campaign for National Parks is the independent national voice for the 13 National Parks in England and Wales. Our mission is to inspire everyone to enjoy and look after National Parks – the nation’s green treasures. We have been campaigning for 80 years to ensure that our National Parks are beautiful, inspirational places that are relevant, valued and protected for all.

We are pleased that National Grid has listened to concerns that we and others, including the Friends of the Lake District, raised in response to the earlier consultations on the North West Coast Connections and that the company is now proposing to underground the whole length of the line through the Lake District National Park. However, we remain extremely concerned that the landscape of the Lake District will still be damaged by this development due to the proposal to install power-lines and pylons just outside the National Park boundary. We also have concerns about the way in which National Grid has defined significant impacts on the landscape; about some aspects of the visual impact assessment and about the extent to which the proposals have been influenced by a short-term desire to reduce costs. Each of these issues is covered in further detail below.

The setting of the National Park

We are concerned that National Grid has failed to pay sufficient attention to the setting of the Lake District National Park when developing these proposals and has adopted an approach to dealing with the setting that is inconsistent with the approach taken for other designated landscapes affected by proposed new connections, including Snowdonia National Park and the Mendip Hills AONB.

The Lake District is a candidate World Heritage Site (WHS) and National Grid must take this special status into account. The [UNESCO World Heritage Operational Guidelines](#) seek protection for the “immediate setting” of each WHS so the proposals for pylons in the Duddon Estuary and Whicham Valley may threaten the Lake District’s candidacy with UNESCO. Paragraph 132 of the [National Planning Policy Framework](#) also makes it very clear that the significance of a world heritage asset derives not only from its physical presence, but also from its setting. National Grid should have taken this into account in its decision-making on this project.

The relevant section of the Technical Appendices (Volume 2.7, Appendix 6A) makes no mention of any special consideration that National Grid has given to the setting to take account of the candidate WHS status. In this section, National Grid discusses various different definitions of setting and then concludes that “primary consideration [for development within the setting] is effects on receptors within the national designation” but it is not clear how that conclusion was reached based on the examples provided, several of which refer to the role of landscape character in determining the area that should be included in the setting and to views into the area as well as out of it.

The Cumbria High Fells Landscape Character Area, which includes much of the Lake District National Park, also includes a number of areas that are well outside its boundary and these areas should be considered to be within the setting of the National Park. However, in the main consultation document National Grid does not even acknowledge that Landscape Character types cross the Park boundary and makes insufficient reference to the impact their proposals will have on the setting of the National Park.

We do not agree with National Grid's claim that one can only appreciate the special qualities of the National Park when one is within it. Neither do we agree with the statement on page 513 of Volume 2.8 Section 2.8.8 which rules out the need to consider the impact on receptors in the setting as these "would not affect the natural beauty, wildlife and cultural heritage of these areas or affect the understanding and enjoyment of the special qualities of those areas by the public". We would also dispute the assessment in the Landscape and Visual Impact Assessment (LVIA) in Volume 2.2 Chapter 7 Table 7.1 page 5 that areas of the setting affected by these proposals are not of the highest amenity value.

National Grid has put forward two options which avoid taking the route through the most sensitive areas of the E1 and E2 sections of the route. These are an offshore 400 kV cable from Kirksanton to the Fylde and a tunnel under the Duddon Estuary. However, National Grid appears to have ruled out both these options on cost grounds, which fails to take account of the priority that should be given to avoiding damage to the landscape and wildlife in this area. In light of the sensitivity of the setting of the Lake District National Park, there is a strong case for one of these two options to be progressed instead of the current proposal. Our preference would be the offshore cable route. This would also have the advantage of avoiding damaging impacts on the Duddon Mosses Special Area of Conservation, an internationally important wildlife site.

National Grid has listened to concerns that were raised previously about the impact of these proposals on the National Park and we welcome that. There is, however, more that needs to be done in order to ensure that the new line does not damage the setting of the National Park. If neither of these two options are taken forward, as a last resort, National Grid should offer undergrounding up the Whicham Valley and around the head of the Duddon Estuary in order to protect the Lake District National Park.

Definition of significant impacts

We do not agree with National Grid's inclusion of the concept of "particularly significant" to describe the impacts of the development (in Volume 2.8, Chapter 8 Options Appraisal). We are very concerned that the approach being taken to dealing with significance is not the standard one as set out in the *Infrastructure Planning (Environmental Impact Assessment) Regulations 2009*. A reference to "particularly significant" in the *National Policy Statement for Electricity Networks Infrastructure* (EN-5) does not provide sufficient justification for using this alternative approach when it is inconsistent with what is in the other National Policy Statements for energy and the EIA Regulations. We are concerned that National Grid is doing this in order to reduce the need for measures to mitigate the impact of pylons located just outside the boundary of the National Park which is completely inappropriate.

Furthermore, as paragraph 4.2.12 of this Chapter makes clear this approach to the term "particularly significant" was not included in the Scoping Report submitted to the Secretary of State in September 2015 so it cannot be considered that it has been

approved by the Planning Inspectorate and agreed to as part of the Scoping Opinion issued in October 2015.

Visual impact assessment

We are concerned that Volume 2.3 Chapter 7 makes no mention of the impacts on local people, residents or businesses of the visual impact of this infrastructure and that National Grid focuses instead on assets such as roads, railways and footpaths. We would also question whether the proper guidelines have been followed when completing the Visual Impact Assessment, for example, there is no narrative in the text related to the images included. In general, there is also a lack of consideration given to the impact on the setting of the National Park in the visual impact assessment.

Costs

The introduction of National Grid's Visual Impact Provision project supported by a £500m allowance agreed by Ofgem and the similar well-established allowances for the Distribution Network Operators demonstrate that there is a willingness to pay to reduce the visual impact of pylons and overhead power-lines in protected landscapes. As National Grid is aware, these allowances are based on extensive Willingness to Pay (WTP) research and are paid for by consumers (through electricity bills). In addition, stakeholders are putting in significant effort (often on a voluntary basis) to assist in the identification of priorities for this funding. Given the resources (in terms of both time and money) now being put into removing existing overhead power lines, it would be far more cost-effective to plan for these new connections to be designed in a way which reduces their impacts on the National Park and its setting from the outset. Attempting to cut costs by not seeking to mitigate the visual impact of the lines in the setting of the Park would, we believe, be a false economy. It is also inconsistent with the approach being taken to reducing the impact of existing lines in, for example, Snowdonia, where it is proposed that power lines in the setting of Snowdonia National Park are now being placed under the Dwyrdd Estuary. If the new lines in the setting of the National Park were deemed worthy of being placed underground at a future date due to the visual impact the current approach will have been a waste of consumers' and tax-payers' money.

We recognise the cost of the proposal is substantial but it is relatively small when seen as part of the whole budget for the Moorside project. We are concerned that some of the impacts of the proposals have been downplayed and insufficient consideration has been given to the policy and legislative requirements which apply when proposing new development in such a sensitive location. If sufficient attention had been paid to the impact of the proposal on the setting of the National Park and the approach taken to dealing with significance – both of which are covered above – we believe allocating more money to further mitigation work, specifically in the setting of the Park by undergrounding the new lines up the Whicham Valley and around the head of the Duddon Estuary, would be justifiable.

National Parks have the highest level of planning protection and specific responsibilities apply when making decisions which affect them and this should have been taken into account throughout the design of the project. In particular, the additional costs involved should have been recognised as soon as a site for a new power station was identified on the far side of a National Park to the nearest 400 kV grid connection. Given that without Moorside there would be no need for this connection, the cost of the project, including the mitigation required to avoid damage to the National Park and its setting,

should be written off over the full 60 year life-span of the Moorside Power Station and against its current £25 billion cost, and NuGen should be contributing towards the cost of mitigation.

These new connections will be in place for a long time so it is essential that the right decisions are made now in order to ensure that the special qualities of the National Park and its setting are protected.

Ruth Bradshaw
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