

COPELAND BOROUGH COUNCIL'S RESPONSE TO THE NORTH WEST COAST CONNECTIONS DETAILED ROUTE PROPOSAL CONSULTATION

1. Introduction

- 1.1 This paper sets out the response of Copeland Borough Council to the National Grid North West Coast Connections (NWCC) Detailed Route Proposal Consultation.
- 1.2 It should be read in conjunction with and provides the local Copeland detail to the Joint Consultation Response prepared by consultants WYG on behalf of those local authorities across Cumbria and North Lancashire who form the Planning Performance Agreement (PPA) Group.

2. Background

- 2.1 National Grid is undertaking a public consultation over its proposals for the NWCC project to connect the proposed Moorside nuclear power station to the national electricity network.
- 2.2 The project is being considered via the Nationally Significant Infrastructure Project (NSIP) planning process. This consultation is a statutory requirement within that process to inform the development of the final project proposals which will go forward as an application for Development Consent Order (DCO) to the Government via the Planning Inspectorate
- 2.3 The applicant is National Grid and the consultation has been arranged by them. The Council is a statutory consultee.
- 2.4 National Grid's current timescale is to make a submission of the DCO application in summer 2017. The process for consideration of the application, with a final decision taken by the relevant Government Secretary of State, is 15 months.

3. National Grid's Preferred Route through Copeland Borough.

- 3.1 In summary the proposed route enters Copeland from the north at a point just east of Gilgarran and heads in a south-westerly direction following the line of the existing 132kv pylons towards Whitehaven. It skirts Whitehaven to the east again following the existing line and heading south to a proposed sub-station included as part of the proposed Moorside project. South from the Moorside site the route follows the

existing route to a point just north of the village of Drigg where the cables are then undergrounded as they enter the Lake District National Park. The cables resurface at a point just east of the village of Silecroft and then follow the line of the existing pylons (which they replace) up the Whicham Valley and around the head of the Duddon Estuary leaving Copeland at a point north-east of The Green.

- 3.2 In addition to the new pylons the proposal includes for a new line of 'trident' wooden poles of c12m in height from a proposed substation near Millom to Lindal in Furness in South Lakeland District to aid local supply and distribution issues to communities in this area.

4. Previous consultation responses by the Borough Council

- 4.1 Stage 1 of the NWCC project non-statutory 'strategic options' public consultation ran for 12 weeks from 4 September until 28 November 2014 and outlined National Grid's proposals to connect and export the electricity that will be generated by the proposed Moorside development.

- 4.2 The feedback received during this consultation, together with the findings from environmental and technical studies, helped National Grid select which route corridor to take forward to the next stage of the development process.

- 4.3 The Councils response to this consultation highlighted the following key issues;

- The protection and enhancement of the boroughs landscape, cultural and historic features and their settings
- Ensuring the potential for economic growth and development within the borough, particularly in areas close to the edge of existing settlements where there is considerable risk of additional infrastructure development constraining opportunities for growth.
- Ensuring the proposed development where possible rationalises the existing wire scape to reduce the negative cumulative visual impact on local settlements, communities and enhances the potential gains and overall acceptability of the project to the local community.
- The potential to ensure that improvements to the transmission network support improvements to the local distribution network, particularly in southern parts of the borough where the poor resilience of existing supply infrastructure compromises economic development and growth
- Maximising the community benefit to the area through the implementation of an economic strategy that seeks to invest in the local supply chain.

- 4.4 In autumn 2015, National Grid undertook a second series of community events during a non-statutory 'route alignment' public consultation giving members of the public the opportunity to learn more about how National Grid was shaping the NWCC proposals.

5. Current consultation

- 5.1 On 28th October of this year National Grid launched its stage 2 statutory public consultation and published documents which set out proposals for the development. The focus of the current consultation is on the detailed design of the proposals.
- 5.2 The documents have been supported by a range of consultation events which are open to the public throughout November and December across Cumbria and North Lancashire. In addition, the National Grid project team have carried out a range of briefings to key stakeholders including local authorities and parish councils.
- 5.3 Through the consultation stakeholders and members of the public have been asked to provide their views on the route the new connection will take; the specific technologies proposed to build the connection; the methods proposed to lessen the impact of a new connection and any other issues the community feel is important.
- 5.4 The stage 2 statutory public consultation is the last consultation on the project before National Grid makes its DCO application. It is the final chance for the public and interested parties to make their views known and to influence the project design.

6. Links to Council Strategy and Policy

- 6.1 In May 2015 Copeland Borough Council agreed a suite of statements relating to nuclear, energy and radioactive waste matters including the following in relation to the developing project proposals from National Grid to connect and export the electricity that will be generated by the Moorside Project.

‘The Council supports in principle the National Grid promoted North West Coast Connections Project but will seek to ensure that potential landscape and environmental impacts are minimised where practicable and that the economic opportunity of the project is maximised’.

- 6.2 In September 2016 the Council agreed a position statement relating to the project and this was based on the PPA Groups ‘Key Impacts Paper’ prepared in July 2016.
- 6.3 The position statement identifies areas of key concern for the Borough Council from the NWCC project under the following headings;
 - Landscape and Visual Impact;
 - Visitor Economy;
 - Transport and Connectivity; and
 - Skills and Supply Chain

7. Current National Grid preferred route – Overarching comments

- 7.1 This section highlights particular comments made by the Borough Council which supplement the contents of the Joint PPA Group response.
- 7.2 The Council expect these issues to be addressed before the submission of the DCO application.
- 7.3 The document is **lacking evidence and information** (across many topics including cumulative impact, transport strategy, movement of wastes and materials, health impacts and the historic environment) which limits the ability of stakeholders to assess potential impacts on local communities and the ability of National Grid to identify appropriate mitigation measures.
- 7.4 The **timing and length of the consultation** process has restricted parish/member engagement and abilities to consider the extent of the 7,000 page PEI report. Parish and Town Council engagement came too late in the process. Both time available and lack of information has compromised the ability of the Council to make a fully informed and considered response.
- 7.5 Our **development plan proposals** and key opportunities for development (including West Lakes Science Park and Whitehaven Eastern Relief Road) need to be protected. There is also a site proposed on land at Low Hall Farm, Mirehouse, Whitehaven on the southern edge of the town, which is being promoted for nuclear worker accommodation related to the Moorside Project. The siting of the pylons and overhead lines is critical to the long-term viability of the proposed scheme and realignment of the route in this area is crucial to ensuring the viability of the development of the site.
- 7.6 In terms of landscape and visual impacts the **setting of the National Park**, not just the park itself should be considered. Many local people currently have views into the National Park which will be negatively impacted.
- 7.7 From the National Park all views to the coast will be impacted. Little consideration seems to have been given to the impacts on residents and other areas of landscape value. Limiting the search for alternative technologies to only designated areas is flawed. Identifying an acceptable solution to crossing the Duddon Estuary is a key issue.
- 7.8 Not enough attention has been given to the **cumulative impact** of pylons and turbines. Copeland has a significant number of pylons already and the addition of these large pylons will add to the number of vertical interruptions across the landscape. Differing heights add to the disruptive visuals. Impact of the new power station is already considerable, and the impacts of both Moorside and the new grid connection need to be considered together and within an overall programme and phasing for the development. The cumulative impact of the existing and new pylons and the proposed Moorside Power station will be especially felt by residents in the

villages of Beckermet and Braystones where additional consideration to potential mitigations is considered fundamental.

- 7.9 Undergrounding for the whole route has been rejected because of **cost** which locally is not considered a valid argument and is not a relevant issue under the Planning Act 2008. There is a very high visual cost for local residents, yet the cost of undergrounding for the national customer is small. Where undergrounding is used as a means of mitigation the affected land will need effective restoration.
- 7.10 Further opportunities for **rationalisation** of existing wire-scapes need to be considered especially around Whitehaven and as previously mentioned around Beckermet too where cumulative impact of proposed and existing pylons is considerable.
- 7.11 The construction process will create 5 years of disruption to roads and the environment and requires specific mitigation. Assessment of cumulative impact with other major projects in the locality is required. A multi-modal movement strategy should be a key component of this approach which needs to include the potential impact and mitigations required for public rights of way and cycle-ways during construction.
- 7.12 As a nationally significant project there is an in-balance between the benefits to the nation and the **benefits to local communities**. Currently there are very few obvious benefits to local communities.
- 7.13 The target of 20% local labour is too low and the Council is looking for this to be increased. The project should target the unemployed and should start offering training now so local people with the necessary skills are available when construction starts. There is currently no local, long term sustainable benefit from the grid connection as all of the electricity will leave Copeland, but it is local residents that are impacted by it. There should be some compensation/ benefit for local people including a property value protection scheme. Local communities need a compensation package for hosting this on the nations behalf.
- 7.14 The project will have significant impacts on the **visitor economy** especially due to the level of disruption during the construction process but the impact is not adequately evidenced or addressed within the consultation documents. Impacts related to image/brand, public access and road and rail links need to be assessed.
- 7.15 Resolving issues related to **reliability of supply and capacity** for future developments especially to communities in the south of the Borough is a fundamental aspiration and expectation from this project. The decision by the developers of the Haverigg Wind Farm to withdraw from their connection agreement with ENW, which removes the need for a substation in the area and the permanent need for the NWCC 132kV trident wood pole overhead line, has created uncertainty as to how the issues of reliability of supply for communities around Millom and Bootle are to be addressed. The Council supports the view of the PPA Group and their concerns that the current

proposals for the new 400kV network and the associated changes to local Electricity North West (ENW) infrastructure do not adequately address issues of security of supply for local communities and the provision of additional capacity to meet the needs of new users and producers. The Council expect the final design of the NWCC to be revised when changes occur in other inter-related projects. In addressing these specific changes related to the Millom substation the PPA Group and the Council consider that the final design should include proposals which resolve these issues for communities in this area.

7.16 The **health** impacts of the line have not been addressed. This is a key issue that has not been considered; too often the landscape takes precedent over protecting the communities. This must be addressed and the health of communities protected.

7.17 A **Transport Assessment** needs to be carried out to identify impacts on the road and footpaths network and a multi-modal strategy should be adopted.

7.18 Impacts of undergrounding on local **archaeology** sites still needs to be assessed.

8. Additional Borough Council comments against key headline themes in the joint PPA response.

8.1 Landscape and visual impact

8.1.1 The Council recognises the scale of the investment proposed in the current preferred route to underground the cables through the Lake District National Park.

8.1.2 The Council consider that 'significant' effects, and therefore the potential use of alternative technology such as undergrounding as well as other mitigations, should be considered across the whole length of the preferred route corridor.

8.1.3 Particular attention to design is required in the following areas;

- Routing east of Whitehaven with regard to the impacts on West Lakes Science Park and other important social and economic receptors;
- In proximity to the St Bees Heritage Coast;
- Moorside site – the routing of the line from the Moorside site and the cumulative impacts on communities including Beckermet and Braystones needs to be considered carefully. As there will be substantial earth movement proposed in this area, undergrounding could be appropriate, reducing the length of disruption for local communities;

8.1.4 Further attention needs to be given to the location of the sealing end compounds to avoid detrimental landscape and visual impacts and impacts on local residents (see section 9 below).

- 8.1.5 The Council is also concerned about the current proposals for the **Duddon Estuary**.
- 8.1.6 The PPA Group have previously recommended that a tunnel beneath the Duddon Estuary is the only acceptable route in order to avoid major adverse impacts, particularly at the Foxfield Ridge, the Duddon Mosses SAC, plus the wider landscape setting of the Lake District National Park (see Letter to Neil Lyons 30 June 2016).
- 8.1.7 This would also avoid significant visual, landscape and community impacts of the proposals in the vicinity of The Green, Kirkby in Furness and Beckside and further south.
- 8.1.8 The Council supports the PPA Group view that National Grid's proposed overhead line route is unacceptable given major (and unmitigated) adverse impacts described above.
- 8.1.9 After considering the proposed route and information presented by National Grid in the PEI Report, the PPA Group strongly recommend that an alternative option that avoids going round the Duddon Estuary is essential.
- 8.1.10 The Council as a key member of the PPA Group welcomes continued engagement by National Grid and the opportunity for collaboration.
- 8.1.11 If another option can be developed that demonstrates that technological and environmental challenges can be addressed, the PPA Group recommend that this should be appropriately considered by National Grid, in consultation with all stakeholders. The Council also supports the PPA Group view that the explanation of costs in the assessment of current options is both limited and lacks transparency, and largely invalidates the evaluation of options. Despite this National Grid has concluded that the preferred option to pursue is the proposed pylon route and has dismissed alternative options.
- 8.1.12 Furthermore, these views are reinforced by Ofgem's concerns stated in North West Coast Connections – Consultation on the project's Initial Needs Case and suitability for tendering (Ofgem 2016). Within this consultation document Ofgem question some of the costs of the alternative options and conclude that the decision between the proposed route and a potential option that avoids going round the head of the Duddon is finely balanced. Additionally, it is stated that if costs escalate then there is a real risk that another option would be better value for money for energy consumers.
- 8.1.13 Whilst we acknowledge that designing a route crossing the Duddon Estuary is challenging and costly, it is vital that the appropriate design and mitigation is provided.

8.1.14 This will help to ensure that the significant impacts of the proposed NWCC project are properly addressed, thereby helping to de-risk the project through the DCO process and increase delivery certainty.'

8.2 Visitor economy

8.2.1 The Council supports the key findings contained within the PPA Group joint response regarding this important economic sector.

8.2.2 In particular, the Council is concerned that not enough is known about National Grid's intentions for the supply of labour for the project and the potentially significant impact that this could have on the availability of visitor accommodation especially in the areas where undergrounding is proposed.

8.2.3 It is also considered important that interventions are identified that mitigate the impacts of the development on the visitor economy, including potential loss of, and disruption to, cycle paths and rights of way during the construction and operational phases of the development.

8.2.4 Mitigation could include a funded package of signage and promotion to improve recreational facilities and activities for visitors including improvements to Hadrian's Wall National Trail, Cumbrian Coastal Way, National Cycle Network (NCN) routes 70, 72 and 700 and C2C cycleway.

8.3 Socio-economics, recreation and land use

8.3.1 Providing the skilled workforce for NWCC will require close and joint working with NuGen and other major employers in the local areas.

8.3.2 Collaborative development of a Procurement Framework and Skills Plan is vital to the delivery the project.

8.3.3 The Council/PPA Group, LEPs and partners should be fully involved in establishing and monitoring clear and enforceable targets that cascade down through all tiers of contractors.

8.3.4 Targets and monitoring arrangements should be integrated into the DCO through submission of the Procurement Framework and Skills Plan as associated documents to the examination process so the targets are delivered by National Grid or any contractor working on the project.

8.3.5 The Skills Plan should set out how National Grid will work with the PPA Group and partners to deliver the skills and training locally required to ensure local people are able to benefit from the project.

- 8.3.6 It is expected that this will include contractual commitments from National Grid (and contractors) for target numbers to be achieved for;
- Work experience placements be offered per year to local schools'/skills providers;
 - Previously unemployed residents recruited through employer-led academies;
 - Apprenticeships for young people, including higher and degree apprenticeships.
 - Working with partners, National Grid needs to make appropriate contributions towards capital improvements at key training facilities, including those at Lakes College.
 - National Grid, with the support of local partners, should be seeking to target support for unemployed/underemployed in deprived communities along the line of the route.
 - National Grid should work jointly with local partners in the development of the Procurement Framework, taking lessons from the nuclear industry such as the procurement activities at Sellafield and Heysham; and
 - The Procurement Framework must focus on local businesses, and provide the support to develop the capacity and capability to secure contracts and use the opportunity to grow and diversify to be able to win contracts elsewhere. National Grid will need to include targets and mechanisms that create opportunities for engagement of local supply chain companies in their project delivery. Targeted business support will be required for supply chain companies, to improve their capability or to enable their expansion, whether for individual companies or for clusters of businesses.
 - National Grid should work with the PPA Group Authorities to ensure positive planning of construction compounds and rail depots on existing sites, and plan to facilitate future re-use and legacy.

8.4 Transport and Connectivity

- 8.4.1 There is a clear need to understand the transport strategy and the details of National Grid's proposals for NWCC in relation to wider connectivity issues including security of supply. Currently the Preliminary Environmental Information provided by National Grid has not identified detailed transport impacts and consequentially there is a failure to identify mitigation measures.
- 8.4.2 From the initial understanding of the project and the current transport infrastructure in the area, it is clear that there will need to be a multimodal approach to the transport strategy using rail, port and highway infrastructure.
- 8.4.3 However, it is also clear that there are many known constraints that will need to be appropriately mitigated and addressed working collaboratively with the Council and relevant highway authorities.

These are as follows;

- Rail improvements will be required to increase capacity for rail freight and improve the speed, reliability, frequency and capacity in general. The Council and partners within the PPA Group expects National Grid to provide an appropriate contribution to the investment required to upgrade the rail infrastructure;
- National Grid will need to deliver required local highway improvements and address pinch-points in the network;
- The NWCC project should not inhibit/prevent development. Preservation of the corridor between Whitehaven and Westlakes Science and Technology Park as a growth area for the town is important and the line of the route should help enable the delivery of the Whitehaven Eastern Relief Road.
- The NWCC project should secure long term enhancement to local and long distance cycling and walking routes to mitigate the impacts of construction and operation of the infrastructure;
- National Grid must develop and manage a green travel plan to promote more sustainable travel, especially at the key areas of employment such as the tunnel head compounds, rail depots and 400kV cable route construction compounds;
- National Grid should seek to work with the Council and the PPA Group to ensure positive planning of construction compounds and rail depots to facilitate future reuse and legacy.
- Security and capacity of supply needs to be enhanced for Millom, Bootle and the wider south Copeland area.

8.5 Cumulative Impact Assessment

- 8.5.1 The Council echoes the concerns raised in the PPA Group Joint Response that a full Cumulative Effects Assessment (especially in relation to the proposed Moorside project) has not been undertaken and the impact that this has on the assessment of appropriate measures for mitigation

9. Specific comments relating to detailed mitigation issues on sectors of the route through Copeland

- 9.1 This section highlights specific detailed issues that have been highlighted to date relating to the route as it passes through the Borough that the Council expect to be addressed prior to submission of the DCO.

Section A1 Moorside to Thornhill

- Cumulative effects resulting from the construction of the 400kV line and pylons and the proposed Moorside Power Station especially in relation to the proposed landscape mounds on the Moorside site. There is potential for the cables to be undergrounded close to the proposed Moorside sub-station.

- The potential for additional rationalisation of cables in and around the communities of Beckermeth and Braystones and the use of lower height pylons in this vicinity to reduce the visual impact on local residents.
- Specific local access roads in the vicinity of High House Road and Church House Lane where narrow widths restrict access for HGVs and require mitigation
- Traffic management proposals in the vicinity of Linethwaite
- Mitigation treatments to the C2C cycleway and Coast to Coast and St Begas Way footpaths need to be described in detail and need to be designed to minimise impacts on the visitor economy
- Concerns about the close proximity of the new pylons to properties in Calderbridge and Pelham and specifically at Sella Grange and Sella Park cottages.

Section A2 Thornhill to Whitehaven

- Amendments to the line of the route need to be made to protect the potential line of the Whitehaven Eastern Relief Road and to minimise the impact on the development potential of sites at the West Lakes Science Park, the redevelopment of school sites in Red Lonning and Moresby Road and the proposed Whitehaven Academy in Cleator Moor Road. In addition, the potential for the proposed alignment to impact on the layout of development proposals for the NuGen Temporary Accommodation area at Mirehouse, south of Whitehaven remains a significant concern. It is recommended that the route of the temporary 132 kV line could be straightened and one of the pylons removed. However, the siting of the 400kV pylons would directly impact upon the proposed main vehicular access and the residential layout to the site. Realignment of at least 3 of the proposed 400kV pylons and lines that would oversail the proposed associated development site would be necessary to avoid directly impacting upon the deliverability of this site.
- Additional rationalisation opportunities should be explored around the eastern fringes of Whitehaven

Section B1 Whitehaven to Seaton (part of)

- Ensuring through the construction process that HGVs have no access through local villages
- The potential to use a lower height pylon at the site of pylon 190 in addition to the lower height pylons already proposed in this area.
- Specific mitigation measures to minimise construction impacts on views to the substation at Stainburn from Moresby Parks
- Cumulative impacts of the new 400kV line with existing wind farms require further consideration for mitigation
- Further details of the proposed construction phase and the impact on existing vegetation are required
- Accesses to pylon construction sites in the vicinity of Pica are poor and require widening

Section D1 Moorside to Waberthwaite

- Clarification on the location of proposed Moorside substation and its impact on the NWCC routing,
- Lack of consideration of cumulative issues with NuGen,
- Impact on NWCC scheme following NuGen Project optioneering,
- Lack of clarity ref highway movements during construction process and movement of materials,
- Cumulative impact issues ref use of rail,
- Limitations of local road infrastructure in particular A5086/A595 roundabout,
- Siting of temporary construction compound and noise disturbance for local residents,
- Operational noise and the potential to reduce this by slightly amending the line away from Station Crescent residents
- More detail is required regarding the construction programme for works between Drigg Holmes and the location of the cable sealing end compound to fully assess the impact on the local community
- The part of the overhead line to the north of the sealing end compound which is in the 'setting' of the LDNP needs to be considered for undergrounding but such a proposal would need to avoid the existing gas main in this area
- Further detail is required to understand the extent of mitigations required to offset the impact of construction works on local footpaths
- Further detail to understand the impact and potential mitigations required in relation to the proposed horizontal drilling under the River Irt is required
- Plans to close the B5344 which is fundamental to the local community should be avoided. Access to pylon locations 400C55 and 400C56 at the junction of the A595 and B5344 need careful consideration and upgrades to the B5344 may be required to take the extra traffic
- Access arrangements to and impacts of the 'haul' road along the line of the undergrounding and on local footpaths need to be explained and mitigations/restoration plans considered
- Contractor access points to the construction sites, closures of local footpaths and the siting of compounds needs to be considered by the local Parish Councils through a local traffic management plan
- Construction site working hours and maintenance regimes need to be agreed with the Parish Council
- Residual effects of undergrounding through the LDNP are unknown and need to be considered for the medium to long term and consideration of mitigation is required.
- Mitigation of impacts on woodland south of Ravenglass due to undergrounding need to be provided though detailed restoration plans
- Mitigation of impacts on the network of local and long distance cycle and foot paths need to be included in a Local Liaison Plan. For example, access to 400C55 will cross a proposed cycle path along the northern edge of the B5344.

- Mitigation measures to avoid the potential adverse effects of visitors being displaced due to the use of local accommodation by construction workers are required

Section D2 Wabertwaite to Silecroft

- Landscape and visual impacts of the proposed undergrounding around the communities of Newbiggin, Hycemoor and Silecroft need to be mitigated
- Further clarification on the use of railway sidings, the proposed crossing of the Annas River and the movement of vehicles through Bootle village and to Bootle Station is required
- Appropriate measures need to be identified to minimise the short term landscaping impacts from undergrounding

Section E1 Silecroft to Arnaby (part of)

- Mitigation measures to avoid the potential adverse effects of visitors being displaced due to the use of local accommodation along the west coast part of the LDNP and around the Duddon estuary by construction workers are required
- Visual and ecological impacts of the replacement 400kV line need to be reassessed and further mitigation required including consideration of an alternative option that avoids going around the Duddon Estuary
- Alternative route options south of Silecroft need to be fully assessed
- Pylon construction sites in the vicinity of Kirksanton require improved access arrangements and the location of the sealing end compound close to Nicle Wood needs to be reconsidered
- Construction accesses around the A595/A5093 south of the Green suffer from narrow road widths and steep gradients which require mitigation and appropriate traffic management measures around the Punchbowl will need to be provided
- Impacts on the local visitor and farming economy need to be re-assessed and appropriately mitigated
- Further work to assess the impact on known archaeological sites in the area is required
- A detailed plan identifying means of mitigating construction impacts on roads, footpaths and cycle-ways and managing construction noise levels is required

10. Concluding comments

Whilst welcoming the opportunity to respond to the consultation the Council has a number of significant reservations in relation to the current proposals which require further development and explanation by National Grid prior to the submission of the DCO application, to enable both local stakeholders AND National Grid to truly understand the potential impacts of the proposals.

The Council looks forward to continued dialogue with National Grid in a bid to resolve these issues, agree an acceptable form of mitigation and infrastructure improvements, to ensure that the project is delivered with the necessary and appropriate safeguards for local communities.