# Kirkby Pressure Group

**North West Coast Connections –Response to Formal Consultation areas E1 and E2**

This is the written response from the Kirkby Pressure Group (KPG) to the consultation process undertaken by National Grid for the North West Coast Connection (NWCC) project. The Kirkby Pressure Group was formed to harness the strength of feeling in the Kirkby-in-Furness community against National Grid's proposal to erect monstrous 50 metre (160ft) 400kV pylons around the Duddon Estuary for the Moorside to Heysham connection. KPG have held a number of community events and open meetings in Kirkby-in-Furness and feel confident this response reflects the feelings of the community. The strength of feeling against National Grid's proposal can readily be demonstrated with over 250 villagers registering as members of the social media campaign against pylons (this is a significant proportion of the community). It is noted that many members of the community will also be submitting individual responses.

**In summary, KPG objects strongly to monstrous pylons being erected by National Grid around the Duddon Estuary, particularly when there are achievable alternatives which would protect the natural landscape.**

## CONSULTATION PROCESS

KPG believe the time available for the consultation process has been insufficient to absorb the vast amount of complex documents. National Grid have previously postponed the planned consultation process on a number of occasions. Many members of the community are angry that they are being rushed to respond, particularly in the run up and during the festive season. During the consultation meetings it became apparent that the complexity of the documents was even too much for National Grid employees. Many members of the community complained of being passed around 'so called' National Grid experts who clearly had limited understanding of the NWCC project and its devastating impact on the Duddon Estuary. It is obvious that the consultation events were staffed mainly by public relations personnel with insufficient knowledge to answer many questions posed by the community. Furthermore, it was surprising to the community that the consultation process includes proposals for a 132kV connection around the Duddon Estuary as this wasn't included in the earlier NWCC consultation meetings.

## DUDDON ESTUARY IMPACT

National Grid's proposal to erect monstrous pylons around the Duddon Estuary is totally unacceptable, and has been labelled 'corporate vandalism' by members of the local community. The Duddon Estuary is loved by many as a landscape where the mountains meet the sea (like nowhere else in England). National Grid's proposal

shows little regard for the natural beauty of the Duddon Estuary. William Wordsworth is famed for his appreciation of the Lake District and recognised the natural beauty of the 'long loved Duddon'. The Duddon Estuary is justifiably still loved by many and is very popular with tourists, walkers, cyclists and nature enthusiasts. National Grid should not be allowed to damage the enjoyment of this area for many generations by the erection of monstrous pylons.

The proposed pylons and associated cables would have a catastrophic impact on a beautiful natural landscape and detrimentally affect the wonderful views into and out of the Lake District National Park (LDNP). National Grid's proposal would seriously damage the setting of the LDNP. National Grid's proposal treats the setting of the LDNP with contempt. The LDNP setting should be protected from monstrous pylons appearing like an enormous electric fence around the Duddon Estuary.

The Duddon Estuary acts like a gateway to the South and West of the LDNP. It is inconceivable and totally unacceptable that many visitors' first view of the LDNP will be through monstrous pylons and associated cables. The proposed pylons would negatively affect tourism and visitor enjoyment of this part of the LDNP. Furthermore, National Grid's proposal will seriously harm the crucial visitor economy in this rural community for generations.

The Duddon Estuary is a Ramsar site, Site of Special Scientific Interest (SSSI) and Special Protection Area (SPA), and is part of Morecambe Bay Special Area of Conservation (SAC). National Grid's proposal will have a detrimental effect on this ecologically sensitive area.

**KIRKBY-IN-FURNESS IMPACT**

National Grid's proposal has an appalling impact on Kirkby-in-Furness with 400 kV pylons and 132 kV infrastructure cutting through the village and surrounding areas. It is difficult to imagine National Grid have given any thought to preserving the natural landscape in the Kirkby-in-Furness area. National Grid's proposal has a number of negative impacts on Kirkby-in-Furness, including the following:-

- Waitham Hill to Marshside – This area is a natural coastal landscape with stunning views out to the Duddon Estuary and into the LDNP. These views are enjoyed daily by walkers, cyclists and nature enthusiasts and will be harmed for generations by the erection of monstrous pylons. The area is also a sensitive ecological marshland which would be damaged by construction work to erect pylons.

- Marshside to Wall End – This area is sandwiched by 400 kV pylons on the coast side and 132 kV infrastructure (including horrendous industrial sized sealing end units) on the farm side. Residents in this area will suffer loss of sea and LDNP views and be in close proximity to high voltage connections. Many residents are very concerned about the Electro Magnetic Field health effects and the constant 'humming and crackling' noises due to proximity to high voltage infrastructure.

- Wall End to Beckside – National Grid believe they have mitigated this area with lower height pylons on the hillside. However, these lower height pylons are significantly wider and give the impression of denser cabling. This area is also affected by 132 kV infrastructure (horrendous sealing end units) on the road side at the northern entrance to the village.

- Beckside to Gargreave Farm - This area of Kirkby-in-Furness is the eastern entrance to the village and has some of the most stunning and locally popular views across the Duddon Estuary to the LDNP. These views will be seriously affected with a line of pylons and cables in the foreground across the hillside.

- Pylons MR-01-130, 134, 148 and cables between pylons MR-01-138 and 139 are particularly close to resident's homes. Despite National Grid's assertion that pylon construction follows EMF guidelines, residents remain concerned noting the high volume of information available which suggests the evidence on EMF safety is inconclusive.

Locals and visitors arriving or passing through Kirkby-in-Furness will be appalled at the high voltage infrastructure in the area. Indeed, all three entrances to the village via the north, east and south will be alongside monstrous pylons, horrendous sealing end units and under high voltage cables. National Grid's proposal will lead to Kirkby-in-Furness being defined by its pylons and sealing end units.

**The Kirkby-in-Furness community strongly object to National Grid's ill thought proposal and urges it to reconsider the achievable alternative options which avoid high voltage infrastructure destroying its natural landscape on the Duddon Estuary and in the setting of the LDNP.**

## EFFECT OF PROPOSAL ON TOURISM

Many businesses in the area are dependent on tourism. Within Kirkby there are three pubs with accommodation, two caravan sites, a number of bed and breakfast businesses and holiday homes. Visitors to these establishments support the local economy by using the village shop, post office and garages. In the short term the area would not be an attractive holiday destination due to the noise of construction, extra traffic on overloaded roads and helicopters overhead. People visit this area to escape the noise and hardware which clutters landscapes in more densely populated areas of the country, seeking peace and tranquillity.

Indeed, one much needed small business in Foxfield, would be unlikely to survive because of the proposed giant pylon directly in front of the property. Who would want to stay in such a location? People choose to buy caravans at the Longlands Caravan Site because of the magnificent views, from that location they will see a line of 50 metre pylons marching towards them. Low Hall Farm, a caravan site and bed and breakfast business, will have 400kv pylons towering above it and 132kv trident poles below. Such a setting would not be conducive to a restful stay especially by those wishing to escape the stresses of urban living.

Fishermen enjoy the tranquillity of the estuary and its unspoilt nature. Other visitors to the area enjoy walking, mountain biking and bird watching on paths around the

Duddon Estuary and on the fells above. Many paths would have to be diverted during the construction phase and enjoyment would be negated by the noise and disturbance. If pylons were built, they would be visible from most places within and above the estuary. NG is creating an industrial landscape where none exists. 400kv pylons (standard or lower level) and their cables are totally out of keeping with the existing landscape.

## EFFECT OF PROPOSAL ON FARMING

The Duddon Estuary has a number of farms. The land will be affected by the construction of pylons and transmission lines across the land. The soil in many areas is susceptible to flooding, and heavy machinery travelling across the land will damage the structure leading to increased erosion. Large swathes of land will be taken out of use during the construction phase and afterwards by large pylon bases. This land, especially fragile soil structures on the marsh and flood plain will take many years to recover.

There is limited land suitable for farming and loss of any of this land will have a very detrimental effect on businesses.

Increased traffic on the roads will impact on farmers going about their work eg moving agricultural machinery and livestock.

Farmers are likely to lose livelihoods in the long term, due to damage to rural landscape. There will be fewer opportunities to diversify into tourism due to fewer visitors.

## EFFECT OF THE PROPOSAL ON WILDLIFE

The area has RAMSAR wetland designation and SPA status. It supports nationally important numbers of natterjack toads (an estimated 18-24% of the British population).

It supports a rich variety of wetland plants and invertebrates - at least one nationally scarce plant and at least two British Red Data Book invertebrates.

The site supports nationally important numbers of waterfowl during spring and autumn passage. It also supports internationally important numbers of overwintering birds.

Duddon Mosses are a National Nature reserve. They are recognised for their international importance as a raised peatland habitat, supporting some specialist bog flora.

The Duddon Mosses display a rich fauna. Roe deer are particularly frequent the area, otters roam and the breeding bird community includes species such as nightjar, woodcock, heron, curlew, cuckoo, tawny and barn owls and buzzard. Reptiles found include the adder, common lizard, common frog and common toad. The insect life of the mosses is rich eg on Little White Moss over 170 species of butterfly and moth have been recorded. These include 15 notable species whose distribution is restricted on a national scale.

Residents see bats flying on summer evenings widely across the area. We understand that EMF from power lines disrupts their navigation systems. The location of any power lines should be investigated further to ensure that there is no unnecessary long term damage to the bat population.

Wildlife does not restrict itself to protected areas. Otters can roam within a radius of 5 miles and therefore National Grid should avoid disturbance by noise, movement, lighting and soil disruption to mitigate against damage to vulnerable species.

The Duddon Estuary is home to several rare flora. Incoming construction vehicles and machinery could easily import none native species eg Japanese Knotweed and Himalayan Balsam into the area. We have seen no mitigation in documentation to avoid this.

The layers of peat laid down over the centuries provide an irreplaceable historical record of vegetation and sea-level changes in the area and are thus valuable for paleo-ecological research.

Damage caused by the proposed undergrounding/trenching and the use of heavy machinery for digging foundations and assembling pylons would desecrate the Duddon Mosses and adjacent area. Recovery from such disturbance will take several years.

## NATIONAL CONSIDERATIONS

43 million people a year visit the Lake District National Park (LDNP), those approaching the western lakes from the south see stunning views as they come down the A5092 to Grizebeck. This estuary is unique in England. It is the only estuary where the mountains meet the sea.

At the Afon Glaslyn estuary in Wales- a similar situation exists where the estuary was outside the adjoining National Park.

The following is a quote from National Grid in 2012 while discussing upgrading existing 400kv power lines.

"*As such, any new overhead line across the Estuary would entail the construction of around 15 additional pylons.* ***Given the constrained nature of the Estuary, and in particular the proximity of Snowdonia National Park and the iconic views to the Park from the Estuary****, the pattern of the existing settlements of Porthmadog and Tremadog and the number of visitors using the area,* ***any overhead line is likely to give rise to significant adverse landscape and visual effects***.''

The outcome was that National Grid placed the power lines underground.

National Grid does not seem to appreciate that the Duddon Estuary is of equal national and international importance.

The current 132kv pylons were built in 1950s before the National Park at a time when the Duddon Estuary was an area of heavy industry with iron ore mining and blast furnaces, and significantly more slate quarrying than there is today. In the

1950s the current set of pylons would not have looked out of place. If the boundary was redrawn today, Natural England may well have taken a different view and included much of the Duddon Estuary and its settlements.

We understand that all relevant authorities, of which National Grid is one, have a statutory duty to have regard to the two National Park purposes when coming to decisions or carrying out activities relating to or affecting the land within National Parks. This legal duty set out in Section 62(2) of the Environment Act 1995- recognises that a wide range of bodies have a direct influence over the future of our National Parks and that the fulfilment of National Park purposes rests not only with those bodies directly responsible for their management but also relies on effective collaborative working. In the 2010 Circular - A Vision for England's National Parks, the government confirmed that relevant authorities will be expected to be able to demonstrate that they have fulfilled these duties and that where their decisions may affect the National Parks, they should be clearly able to show how they have considered these areas in their decision making. It is also worth remembering that the first purpose of National Parks is not just to conserve the special qualities of the Park, but also to enhance. National Grid, by removal of pylons, has an opportunity to enhance the views of the National Park from the Duddon Estuary and vice-versa. All of this is strengthened by the bid to UNESCO for World Heritage Site status for the Lake District National Park. The National Grid's decision needs to be fundamentally reconsidered in the light of its statutory obligations.

National Grid has paid little account of the implications of the Marine and Coastal Access Act 2009, which places a statutory duty on Natural England to develop a coastal path and associated open access land around the whole coast of England. Natural England is currently developing plans for this route around the edge of the Duddon Estuary, enhancing the existing Cumbria Coastal Way. This route will open up a new recreational facility for the whole country. It will provide stunning views of the National park as well as the coast. The impact of the proposed pylon route on the views from this route looking into the Lake District National Park and towards the surrounding fells should be taken into account by the planning inspectorate.

## HOLFORD RULES

Guidelines on overhead line routeing were first formulated in 1959 by Sir William later Lord, Holford, who was a part-time member of the CEGB. National Grid has reviewed these guidelines, known as the 'Holford Rules', and concluded that they have stood the test of time. Disappointingly, National Grid appear to have given little regard for the Holford Rules around the Duddon Estuary.

***Rule 1:*** *Avoid altogether, if possible, the major areas of highest amenity value, by so planning the general route of the first line in the first place, even if the total mileage is somewhat increased in consequence. Note on Rule 1 Investigate the possibility of alternative routes, avoiding if possible the areas of the highest amenity value. The consideration of alternative routes must be an integral feature of environmental statements. Areas of highest amenity value are: Areas of Outstanding Natural Beauty National Parks Heritage Coasts World Heritage Sites.*

This area adjoins and enhances the LDNP, being within its setting. By proposing monstrous pylons around the Duddon Estuary, National Grid are demonstrating little regard for the natural beauty of the landscape, the setting of the LDNP, the Cumbria Coastal Way, and World Heritage site application for the Lake District.

***Rule 2:*** *Avoid smaller areas of high amenity value, or scientific interests by deviation; provided that this can be done without using too many angle towers, ie the more massive structures which are used when lines change direction. Note on Rule 2 Some areas (e.g. Site of Special Scientific Interest) may require special consideration for potential effects on ecology (e.g. to their flora and fauna).*

Current plans go through and alongside areas immediately adjoining protected areas. Wildlife does not restrict itself to rigid boundaries. Otters range over many square miles. The soil structures in immediately adjoining areas are fragile, subject to flooding and will take many years to regenerate. National Grid are clearly ignoring the negative environmental effect on the ecologically sensitive area around the Duddon Estuary.

***Rule 3:*** *Other things being equal, choose the most direct line, with no sharp changes of direction and thus with fewer angle towers. Note of Rule 3 Where possible choose inconspicuous locations for angle towers, terminal towers and sealing end compounds.*

Except for the stretch alongside the A595 from Kirkby to Askam there are no more than 6 pylons in a straight line in area E2. Furthermore, proposing 4 off 132kV sealing end compounds in the fields by the roadside entering Kirkby-in-Furness village from the north or the south could hardly be described as inconspicuous locations.

***Rule 4:*** *Choose tree and hill backgrounds in preference to sky backgrounds wherever possible; and when the line has to cross a ridge, secure this opaque background as long as possible and cross obliquely when a dip in the ridge provides an opportunity. Where it does not, cross directly, preferably between belts of trees.*

The main road route will have these pylons silhouetted by the sea not hills. The rail route will see pylons breaching the peaks of the surrounding hills. Walkers will be surrounded by pylons which will affect sea and hill views.

***Rule 5:*** *Prefer moderately open valleys with woods where the apparent height of towers will be reduced, and views of the line will be broken by trees. Note on Rules 4 & 5 Utilise background and foreground features to reduce the apparent height and domination of towers from pan viewpoints. Minimise the exposure of numbers of towers on prominent ridges and skylines. Where possible avoiding cutting extensive swathes through woodland blocks and consider opportunities for skirting edges of copses and woods. Protecting existing vegetation, including woodland and hedgerows, and safeguard visual and ecological links with the surrounding landscape.*

The proposed pylons around the Duddon Estuary breach the skyline on many occasions. Views of the Duddon Estuary and views into and out of the LDNP will be scarred by monstrous pylons and lines of cables. Furthermore, few trees will grow sufficiently to hide 50m pylons.

***Rule 6:*** *In country which is flat and sparsely planted, keep the high voltage lines as far as possible independent of smaller lines, converging routes, distribution poles and other masts, wires and cables, so as to avoid a concentration or 'wirescape'.*

Erection of 400kV pylons and 132kV infrastructure will inevitably lead to 'Wirescape' around the Duddon Estuary. The beautiful natural landscape will be destroyed for generations by what will appear like a giant high voltage electric fence. The proposed route necessitates cable sealing end units close to housing and adjacent to main roads where the two power lines cross. It is proposed that there will be two parallel lines beside the A595 between Kirkby-in-Furness and Askam-in-Furness.

***Rule 7:*** *Approach urban area through industrial zones, where they exist; and when pleasant residential and recreational land intervenes between the approach line and the substation, go carefully into the comparative costs of the undergrounding, for lines other than those of the highest voltage.*

There is no industrial area in E1 and E2, yet cable sealing end units are proposed near churches and housing and the village school. Such monstrosities are totally out of place in a rural environment. Surely residents in rural communities deserve the same consideration as those in urban contexts. The proposed route approaching the tunnel head goes through rural communities, there is already an existing pylon route into Barrow-in-Furness through the industrial area, following such a route would protect the amenity value of this area. National Grid's proposal is treating a beautiful natural landscape as if it was an industrial zone.

National Grid does not appear to have obeyed its own rules relating to the siting of pylons and associated hardware. It has made insufficient mitigation with regard to the cumulative impact of 400kv lines and trident line within Kirkby-in-Furness and the Duddon Estuary setting of the LDNP.

## ALTERNATIVE OPTIONS

This is an opportunity for National Grid to improve its image across the country by removing the existing 1950s pylons and taking the transmission lines offshore, so avoiding all pylons within the Duddon Estuary and Whicham Valley. The National Grid would then be enhancing, not damaging a landscape praised by William Wordsworth, JMW Turner, Norman Nicholson and Alfred Wainwright.

Using 20th century technology for the 21st century when other options are available which protect our precious open spaces because of cost considerations is not

acceptable.  Morecambe Bay deserved protection, surely the Duddon Estuary, in the Lake District setting, with its higher dependence on tourism, is equally deserving.

National Grid advised that the cost of avoiding monstrous pylons around the Duddon Estuary is in excess of £200 million. However, in consumer terms this equates to approximately 20p (YES 20 pence) on the annual bill of consumers. Consumers will be the beneficiaries of a secure electrical supply from Moorside; therefore it is only reasonable that consumers should pay a fair and reasonable price for their electricity. The cost of protecting the Duddon Estuary and the setting of the LDNP from monstrous pylons is fair and reasonable. It is totally unacceptable that the Duddon Estuary should be sacrificed for a cheap and dirty solution for National Grid.

**KPG urge National Grid to reconsider and modify it's proposals accordingly to ensure the Duddon Estuary is protected from monstrous pylons.**