



## Response to National Grid (NG) route consultation 2016

### 1. Introduction

1.1. Power Without Pylons (PWP) is a local group formed in February 2015 to campaign for a pylon-free solution to connecting the proposed Moorside nuclear power station to the UK electricity grid. PWP accepts the need for this connection, and for more power generation and welcomes the contribution Moorside will make to the local economy, but seeks to protect the unique landscapes of the Lake District.

PWP has always campaigned for a pylon-free solution to the entire southern route from Moorside to Heysham. PWP believes that there are several feasible alternatives which protect the landscape and the setting of the Lake District National Park (LDNP).

Despite our sparsely populated area, PWP has much local support, including over 600 supporters on our database, among them chartered engineers and other technically qualified professionals. The group also has strong and active support from the senior management team at textbook publishing company CGP. With sites in Broughton, Millom and Grizebeck, the company is an expanding business and a major employer in the Duddon area.

Since its inception, PWP has made a large contribution to raising awareness of the NWCC project. The group is steered by a management committee and has achieved status as a well-informed representative stakeholder and voice of the anti-ylon lobby. PWP is responsible for a large amount of the unprecedented media coverage that the issue has gained in the local, regional and national press as well as regional television and radio, for example:

<http://www.telegraph.co.uk/news/2016/12/06/william-wordsworths-descendant-campaigns-save-beloved-lake-district/>

Also:

## Blighted by Pylons

The Lake District must be preserved despite the cost of burying power lines

They epitomise Wordsworth's startled delight when seen fluttering and dancing in the breeze. But daffodils in the Lake District are less captivatingly beautiful when viewed against the backdrop of monstrous metal pylons stalking the hills. It is not only the poet's direct descendant who views the prospect with alarm; thousands of others have lent their names to the campaign to persuade the National Grid to abandon plans to install the 47-metre structures as close as six metres from the boundary of the Lake District National Park.

Those who strode through the dank countryside in protest again yesterday have had a measure

of success: the National Grid suggested in October that it would bury any new power lines in the park, remove all existing structures and reroute other proposed new lines. But while its plans pay homage to the idea of protecting the landscape, erecting new pylons just outside the park's southwestern boundary would still wreck the beauty of the Duddon estuary, a view that inspired in Wordsworth a series of celebrated sonnets.

Burying the lines from the proposed new nuclear power station near Sellafield will cost up to £460 million more than suspending them from pylons. And it would cost a further £200 million to

bury those still scheduled to skirt the edge of the park. Who will foot the bill is a legitimate question: local authorities, central government and electricity consumers will all complain that they are not solely responsible for England's heritage. And trying to raise the money from toll charges on visitors to the national park is impractical.

There is an alternative: an undersea cable south from Sellafield could bypass the Lake District entirely, coming ashore further south. Every option must be considered: once desecrated, Britain's uniquely beautiful landscape cannot be recovered or switched back on like a power cable.

This submission was drawn up by the management committee, and reflects the views of PWP supporters, and many others living in the area.

- 1.2. It is unfortunate that this submission will need to reiterate many of the points that PWP made in its last submission in 2015 (which has been appended to this submission for completeness). PWP welcomes the undergrounding of the pylons in the LDNP that NG has now offered in response to the consultation replies received in 2015. However, PWP believes that the proposed route of the new 50m pylons, from Silecroft, along the Whicham Valley, around the Duddon Estuary and across the Furness peninsula to Roosecote (referred to below collectively as the 'Duddon Estuary'), will have a devastating effect on this area, which forms part of the setting of the LDNP. The proposed pylons would have a serious impact on local communities including The Green, Ladyhall, Foxfield, and Kirkby-in-Furness. It is doubly unfortunate that NG is refusing to consider alternatives which its own research shows to be feasible, because it does not believe that the landscape is important enough, or that the harm would be sufficient, to warrant the extra expenditure that would be involved (see section 14 below). PWP and its supporters robustly contest this position, and will continue to do so at the planning inquiry and if necessary beyond.
- 1.3. The alternatives and their costings are discussed below at section 14.
- 1.4. Building a new line of huge pylons around the Duddon Estuary would be a retrograde step and a disaster for the southern area of the Lake District. The countryside in the UK is blighted by poles and wires in many places. This cannot be corrected overnight, but the long-term objective should be to remove as many pylons, poles and overhead wires as possible, and not to install more. Pylons are a twentieth-century technology, which new advances in materials engineering may well render obsolete within the near future.
- 1.5. NG's early proposals were to build the route with pylons all the way from Moorside to Heysham. In the course of its consultations over the last three years it has now arrived at a proposal that undergrounds the whole route except for the section from Silecroft to Roosecote. It is difficult to see why the estuary, which is of high landscape value and forms part of the setting of the LDNPA, as well as being an important gateway to the iconic regions in the west of the park, should be singled out in this way.
- 1.6. The documentation produced by NG for the consultation is prolix and complex. As material produced to assist the 'man and woman in the street' to understand how NG has arrived at its proposals, it could hardly be less fit for the purpose. It has no index; and no overall search facility to help the reader. It scatters material that should be gathered together into several places; it separates terms from their definitions, which in some cases vary both within the documents and from definitions that NG have used elsewhere; it fails to provide the authority for many of its assumptions, such as the degree of harm which would merit mitigation; and in its tables it applies a mechanistic and formulaic approach which puts a false veneer of objectivity and science on what is at the end of the day a collection of somewhat perverse subjective judgements, many of which fly in the face of the evidence provided by its own photomontages, as well as those provided by others. Given NG's resources, we would have expected something better, and we believe that consultees were indeed *entitled* to something better.
- 1.7. A consultation period of barely three months, including Christmas, is not sufficient for lay people, who lack the resources of NG and are not paid professionals, to get to grips with what NG is proposing and to make a considered response to 7,000 pages.

- 1.8. It is next to impossible to respond in any structured way to the findings. PWP has therefore produced some general comments on what appear to be the main problems with the overall methodology and assumptions, and these are followed by a case study of one section (the Whicham Valley) to illustrate the illogicality of NG's approach. PWP reserves the right to add to or vary these comments in its submissions to the Planning Inspectorate (PINS).
- 1.9. PWP would request that the responses to the consultation be gathered and held in a form where they are amenable to an independent audit, should the need for that arise.
- 1.10. PWP questions the consultation's sufficiency and suitability. PINS Advice Note 16 makes it clear that the applicant is required to provide sufficient details of its scheme and the potential environmental impacts to enable all consultees to make informed responses in relation to the project. Applicants are therefore likely to be required to produce a Preliminary Environmental Information Report or draft Environmental Statement, as well as full plans. The applicant is then required to take into account those responses in finalizing its scheme, prior to submission of the application. PWP has made a complaint about the online layout of the consultation documents (letter appended). PWP is also aware that some stakeholders (including the Parish Council Coordination Group) have raised concerns about responding within the relevant timeframe. Requests for an extension of the deadline for submission of consultation responses have been refused.
- 1.11. The purpose of the statutory consultation, as mentioned above, is to allow NG to take into account the responses in finalizing its scheme before it submits an application for a Development Consent Order (DCO). NG's stated timetable makes it apparent that it does not expect to modify its proposals as a result of the present consultation. This finishes in January 2017, and NG expects to make an application for a development consent order for the project to PINS in April 2017, far too short a timespan for it to undertake any substantial revisions. PWP believes this to indicate that NG has already made its mind up, and that the results of the present consultation are likely to be ignored. This, as well as the indecently hasty timetable for the consultation discussed above, amounts to a contempt for the process, and is a matter that PWP will raise with PINS.
- 1.12. The Statement of Community Consultation (SoCC) sets out how the community are to be involved in the consultation process. Sections 2.4 and 2.5 address who will be consulted and how. PWP questions whether NG has honoured what is set out in these sections. Specifically, it questions whether people have been able to access clear and concise information (as stated at 2.5.2) in view of the difficulties identified at 1.6 above.

## **2. Baseline for project**

- 2.1. Underpinning much of NG's argumentation is the use of the existing 132kV overhead line (OHL) as a baseline. See for example, *'The design of the project follows the alignment of an existing 132 kV overhead line very closely, which would be removed as part of the project. Therefore it does not introduce "development" into hitherto undeveloped areas.'*
- 2.2. PWP believes this assumption to be questionable, for the following reasons.
- 2.3. The existing OHL was constructed around 1950 just before the National Park was created. There is therefore no precedent for Lake District National Park Authority (LDNPA) to have given permission for an OHL within the Park, and the LDNPA would not have allowed this construction if it had existed at the time. Of course new planning

regimes cannot be applied retrospectively. But where a complete replacement of existing infrastructure is proposed PWP believes it should be judged against current standards and not permitted to use a non-compliant installation as a baseline. See also Rule 1 of the Holford Rules, discussed at paragraph 11.11 below.

- 2.4. It is an important part of NG's case that it will remove this line, implicitly as a reward for accepting the new, much bigger one. The reasoning appears to run as follows: the old line is an eyesore; the new line is even more of an eyesore; so we will compensate for this by removing the old line. But if the existing line does harm, and its removal is admitted to constitute an improvement, by removing development from otherwise undeveloped areas, then the proposals can only make that harm worse.
- 2.5. It is further hard to see how a condition that the old line should be removed could be enforced. NG has said that it wishes to retain the pylons while the new line is built. Once that line is built whether or not the old line is removed is totally NG's decision – it is not impossible that it might suddenly discover an urgent need for it for local distribution. Even if this breached a planning condition laid down by PINS no enforcement action could then be taken to remove the 400 kV OHL, so in effect this condition would be unenforceable.
- 2.6. NG also smuggles in the undergrounding of the new 400 kV line as beneficial. It is of course nothing of the sort. No such line presently exists, and no planning permission for one has been given; the undergrounding cannot therefore be invoked as a beneficial effect to offset harm. The absence of harm (on NG's case) is not a benefit, rather it is the creation of a 'neutral' situation in which there is neither harm nor benefit.
- 2.7. The argument that no 'development' is being introduced misses the fundamental point that what is being introduced, in terms of its scale, size, prominence and location with respect to key views into and out of the LDNP materially changes the character of the area through which the pylons will pass. The existing pylons are unfortunate; but the proposal would completely alter the visitor's experience of views into and across the LDNP (see further paragraph 5.2 below).

### **3. Ofgem and the VIP project**

- 3.1. Ofgem has recently provided £500 million funding to NG's "Visual Impact Provision" project to remove OHLs from national parks and AONBs. It seems senseless for NG to be funded to remove existing pylons from such areas while proposing to erect more large pylons in areas of the Lake District that are equally - if not more – sensitive.
- 3.2. In considering where this funding should be used the decision-makers specifically included in their consideration areas adjacent to and within the setting of national parks and AONBs.
- 3.3. This route would contravene Ofgem's own rules: *"When installing this equipment companies must take into account the environmental impacts of new investment, including the visual impact of infrastructure. Action to conserve natural beauty might include finding alternative routes, undergrounding cables, alternative pylon design, tree screening and camouflage."*
- 3.4. PWP does not accept that *"alternative pylon design, tree screening or camouflage"* would reduce the impact of 50m-high 400kV pylons. While trees in some places do screen the impact of the existing line, in general the proposed new pylons are considerably taller than any surrounding trees, which are therefore not capable of providing screening or camouflage (see section 5.5 below).

#### 4. Ofgem and costs

- 4.1. PWP has recently become aware of Ofgem consultation document ‘*North West Coast Connections – Consultation on the Project’s Initial Needs Case and suitability for tendering*’, which questions the costs budgeting upon which the proposals are based (see further section 14 below).
- 4.2. PWP has always maintained that the landscape of the LDNP and its setting and the visual amenity of visitors to the area can be protected in a cost-effective manner. For example the proposal for an HVAC subsea connection between Kirksanton and Rossall (see section 14 below) would amount to an increase in costs of only 7% and would afford significant levels of protection to the landscape.
- 4.3. The issue for any decision maker in this case will be where the balance lies between the costs of a project and harm to landscape and visual amenity. Without clear information regarding the costs of various proposals it is hard to meaningfully engage with the proposals. Ofgem’s criticisms suggest that the costs of this project have not been calculated in a robust manner. PWP notes with disappointment that NG has not sought to make Ofgem’s information accessible to the public; nor has there been any meaningful engagement with this new information by way of reply or extending the consultation time limits to allow all parties to consider matters further.

#### 5. Negative effects of the proposed OHL route: landscape and visual

##### *Pylon size and impact*

- 5.1. In the discussion of pylon height the standard size of the pylon is given as 46.5 metres in height and 18.2 metres across. Height extensions to this may be required. An NG document gives the individual heights of the pylons from Silecroft to Lindal. The average of these is over 50m, the maximum being 61.5m. The dimensions of the pylons proposed would be

<i>Existing 132kV</i>		<i>Proposed 400kV</i>	
Width	7.5m		18.2m
Depth	4.1m		7.1m
Height	26.0m		50m (average)
Volume	<b>799.5m<sup>3</sup></b>		<b>6461m<sup>3</sup></b>

This makes the new pylons over eight times larger than the 132 kV. Yet NG persists in describing the new pylons as only ‘*slightly taller*’. NG also refers to the footprint of the 400kV pylons as ‘*only slightly greater than that of the 132kV pylon*’ yet in reality it is more than four times as big.

- 5.2. NG’s Table 6.8 in volume 2.2 Chapter 6 indicates two possible alternative effects of the increased pylon size.

It states that there could be ‘***a large level of change in landscape character if ...the new overhead line becomes a dominant feature in the landscape (whereas the landscape has the capacity to assimilate existing 132 kV overhead lines, for example because these are of comparable scale to existing elements or are less prominent) and/or dominates important visual connections with other landscape types, where this is a key characteristic of the area.***’

Alternatively, again according to Table 6.8, there would only be '*a medium level of change in landscape character if the 132 kV lines are already a noticeable element with this landscape. The 400kV overhead lines would be more prominent but would not change the overall balance or composition of the landscape and/or key views to other landscape types [so that] these views would not be dominated.*'

- 5.3. St George's Church in Millom (Paley and Austin) is a local landmark, referenced in Pevsner, widely visible from views across and around the estuary. Its height is 43 metres; and the proposed pylons would be between 3.6 and 7 metres higher, thus becoming the tallest man-made structures in the Duddon Estuary, immediately imposing on it a new scale of development, where an industrial feature becomes the largest object.
- 5.4. NG's own photomontages support this contention, as do our own. The increased bulk of the proposed pylons amounts to a qualitative change of the former kind in paragraph 5.2, which, while it does not '*introduce development into hitherto undeveloped areas*', intensifies that development to an intrusive and unacceptable level. The change would fundamentally alter the viewer's experience of the landscape. PWP therefore disagrees with NG's estimates of the small magnitude of change caused by the new pylons, and considers its estimates of the harm they would cause to be unrealistic.
- 5.5. The increased height of the pylons also makes it less likely that they will be screened by tree cover. According to the Forestry Commission the average height of a British tree is about 20m. The proposed pylons are nearly three times that. The oak is the largest native tree, and that can grow to 30m – over a period of a hundred years. Statistics provided by the Forestry Commission further show that trees in the north-west rarely grow beyond 20 metres, and cannot realistically be used for screening purposes. See: [http://www.forestry.gov.uk/pdf/ninorthwest.pdf/\\$FILE/ninorthwest.pdf](http://www.forestry.gov.uk/pdf/ninorthwest.pdf/$FILE/ninorthwest.pdf)  
In any case, the trees on which NG relies are not within their control.
- 5.6. Nowhere in NG's documents do we find any acknowledgement of the intrusion caused by the 18 connecting wires. These have elsewhere been described by NG, in its document *Delivering current electricity* as 'nearly as thick as a rolling pin'. This will hardly enhance the landscape. In the Whicham Valley it will create an impression of a gigantic steel fence along the border of the National Park.

#### *Setting of the LDNPA*

- 5.7. At various points in its documents NG mentions the importance of the setting of the LDNP. Although the word 'setting' does not have a statutory definition, it is amply clear from the material that has been cited at length by statutory consultees that there is a duty on decision makers, as part of their responsibilities towards the LDNP, to screen all development within contiguous areas, especially those displaying the same landscape characteristics as the LDNP, for possible impacts, on views both looking into and out of the LDNP.
- 5.8. Although NG has in other places where it is developing new power lines, such as Afon Glaslyn near Snowdonia and the Mendip Hills AONB in Somerset, considered views looking into protected areas, and proposed undergrounding to preserve such views, it has decided not to do so here: '*Receptors outside the LDNP are not considered by the appraisal, as effects upon these receptors would not affect the natural beauty, wildlife or cultural heritage of these areas or affect the understanding and enjoyment of those areas by the public.*' This seems to be illogical: for one example of the harm see NG's own photomontage PEI\_7.15.4\_E2\_573 No. 2. The natural beauty of the LDNP as viewed from multiple viewpoints around the Duddon Estuary, with its views of the high

Lakeland fells including the Scafells, cannot but be affected by being seen through a foreground of pylons and wires.

- 5.9. It is also PWP's contention that areas in the setting of the LDNP should be treated in the same way as areas that are 'nationally designated', by analogy with the setting of a listed building being afforded the same protection as the building itself. This will have a significant effect on many of the judgements of landscape and visual harm that NG make in its EIA. Not to do so, and to afford such areas a merely local designation is to make an artificial distinction, particularly as the landscape in many areas adjacent to the LDNP forms a continuation of the same features as the designated landscape: without a map no boundary is apparent.

#### *Holford Rules*

- 5.10. PWP believes that item 4 of the Holford Rules is being used inappropriately. This states: 'Choose tree and hill backgrounds in preference to sky backgrounds wherever possible.' However, the fact that skylined pylons can cause a greater magnitude of harm than those backgrounded by an existing landform does *not* imply that backgrounded pylons will never cause harm. In an open setting such as an estuary pylons are visible from multiple viewpoints – not surprisingly though 360 degrees – and though backgrounded from one perspective may be skylined from others, as is indeed the case here. Most visitors and residents will be moving through the landscape, not stationary within it. And pylons and wires may also cause harm even when backgrounded, by their sheer intrusive scale and dominance, as within the Whicham Valley (see section 11 below).

#### *Definitions and criteria for harm*

- 5.11. There is a lack of clarity in NG's technical documents about whether the impact of the proposals needs to be 'significant' or 'particularly significant' to require mitigation, and about the definitions of these terms and the criteria that need to be met for landscape mitigation.
- 5.12. Going back to the legislation, it is stated in the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 that the EIA should include a 'description of the measures envisaged to prevent, reduce and where possible offset any *significant* adverse effects on the environment' (added italic). This was also the position taken by NG itself in its application for the Hinkley Point connection.
- 5.13. However, NG has now decided that the harm needs to be 'particularly significant'. Although EN5 uses the terms '*particularly significant*' and '*particularly sensitive*' it is not possible for a government circular to set a higher threshold for environmental harm than that established by law. Since this is the case, PWP believes that NG's statutory duty to consider mitigation of any significant adverse effects on the environment remains.
- 5.14. In any case, and without prejudice to the above, a closer reading of EN5 indicates that it does not in fact raise the overall bar for landscape harm to '*particularly significant*'. At paragraph 2.8.2 it refers to the need for mitigation (undefined) simply of 'adverse' landscape and visual impacts, also acknowledging that in 'particularly sensitive landscapes' such lines may simply be unacceptable.
- 5.15. In addition, at paragraph 2.8 4 where EN5 uses the term '*particularly significant*' it is referring only to visual impact; and as NG itself has pointed out, visual impact and landscape harm need to be treated separately.



- 5.16. If we rebase NG's own criteria correctly on the wording of the circular EN5 then, all findings of moderate, or major/moderate landscape harm in sensitive landscapes, whether nationally designated or not, should be reinstated as warranting mitigation. This again substantially changes the basis for all NG's appraisals of landscape harm.
- 5.17. Although we consider the use of the term 'particularly significant' illegitimate, NG has failed to provide a working definition. In the volume on Options Appraisal of Alternative Technology (volume 2.8, section 2.8.8) their image 4.1 offers one definition, which is varied at 4.4.8, where it is stated that the threshold of 'particularly significant' from a landscape perspective will be where '*substantial magnitude effects are most likely to occur on highly sensitive landscape areas outside nationally designated landscape areas*' or '*medium magnitude effects are most likely to occur upon highly sensitive landscapes within nationally designated areas*'. From a visual impact perspective the criteria are again subtly redefined, so that the development would cause '*a substantial magnitude of change for highly sensitive receptors that are not relevant to the purposes of nationally designated landscape areas*' or causes a '*medium magnitude of change for such receptors that are relevant to the purposes of nationally designated landscapes*'.
- 5.18. No authority or logic is cited for any of these seemingly arbitrary criteria or cut-off points. It is hard to evade the conclusion that NG has made up its rules as it went along, to ensure the desired results.

#### *Special Qualities of the LDNP*

- 5.19. In volume 2.3 NG has a long section identifying the special qualities of the LDNPA, which it concedes are '*most clearly expressed in the relationship between the high fell landscapes of the LDNP ... and the coastal sandstone landscape in the National Park... This relationship does not occur anywhere else in the National Park...*'
- 5.20. NG then goes on to acknowledge that this is part of a 'world class cultural landscape' and a 'source of artistic inspiration', citing Wordsworth and later Wainwright, and pointing to the importance of these attributes of the LDNP in the current World Heritage Site (WHS) application. It is worth noting that nowhere else in England is there a similar landscape where the mountains come directly down to a river estuary.
- 5.21. However, there appears to be no recognition of this in any of the technical documents that NG has supplied. It merely says, in what amounts to an admission of defeat, 'Although important, it is not possible to comment on any specific effect of the project on this special quality other than to note that such considerations have made a major contribution to developing the design of the project in its relationship with the National Park'.
- 5.22. PWP presumes that this 'major contribution' applies to the undergrounding on the west side of Black Combe; these 'special qualities' have been completely ignored on the east side of Black Combe and round the rest of the Duddon Estuary.
- 5.23. The zones of visual influence maps indicate very few viewpoints within the LDNP (see document 7.1.7. ZVI), though that map fails to show the LDNP boundaries. The references to public rights of way are also outdated in areas of access land, where users can and do roam freely. Assessments of harm within access land therefore cannot be restricted to rights of way. In any case, as mentioned above, views of pylons are not stationary: visitors typically move through a landscape, and their views of pylons will change and be more foregrounded as they do so. The areas which would be treated to a view of over 10 pylons are extensive; particularly shocking is the 58+ pylons visible



from large areas of the Black Combe massif. Numerous pylons would likewise be visible from the A595 and other tourist routes. Although NG state that some of these would be screened by vegetation, this is unlikely in view of the pylon heights (see paragraph 5.5 above), and would in any case be very much less so in winter. The LDNP is a year-round tourist destination, and views are particularly fine in winter weather, when the snow would throw the pylons and their wires into even greater relief.

## **6. Negative Effects of the Proposed OHL Route: Health**

- 6.1. The government document, National Policy Statement for Electricity Networks Infrastructure, includes a section (2.10) on Electric and Magnetic Fields (EMFs) which states: *“EMFs can have both direct and indirect effects on human health. The direct effects occur in terms of impacts on the central nervous system resulting in its normal functioning being affected.”*
- 6.2. The document also gives guidelines for siting 400kV lines where houses and schools are nearby. Current proposals may contravene these guidelines where the planned route would pass close to schools.
- 6.3. Kirkby-in-Furness is of particular concern. The new 400kV OHL would be very close to the school (less than 200m) and the site of a proposed housing estate behind the school. The much higher voltage line would bring greater potential health risks from EMFs.
- 6.4. There has also been discussion in the past relating to leukaemia clusters close to power lines. This has not been proved, yet equally it has not been disproved.

In his extensive research into the adverse effects of electric and magnetic fields from high voltage powerlines, Dr Denis Henshaw, Professor of Human Radiation Effects at Bristol University and scientific adviser to the charity Children with Cancer UK, points to instances of sleep disorders and depression in people living close to high voltage powerlines. He also acknowledges the increased level of childhood leukaemia in such areas and states that magnetic fields from powerlines is a contributory factor to this and other forms of cancer in children.

## **7. Negative effects of the proposed OHL route: cultural heritage**

- 7.1. The Lake District plays an important national and international role in the development of the landscape conservation movement. Such is the significance of the LDNP's cultural landscape that the UK government backed an application for it to be designated by UNESCO as a WHS. A proposal to site pylons close to it is wholly incompatible with World Heritage status and may jeopardize the bid.
- 7.2. The proposed OHL route therefore needs to be seen as a route which may adversely affect the setting of a designated WHS. For the reasons outlined above the analysis conducted by NG regarding impact on setting and visual impact on landscape are quite inadequate.

## **8. Negative effects of the proposed OHL route: tourism**

- 8.1. National Grid acknowledges that there is the potential for OHL development to have an effect on tourism in the area. Tourism is a vital part of the local economy: farmers and landowners have been encouraged to diversify by providing holiday accommodation

and many local businesses that provide products and services to visitors rely fully or partly on tourism.

- 8.2. Since the economy is therefore highly sensitive to landscape damage, it is necessary to have a clear understanding of the potential effects of an onshore route and its likely costs to the economy.
- 8.3. NG states that visitors would become accustomed to the taller 400kV structures. Firstly, this implies that the new pylons are something that people will take time to get used to, and therefore that they are a damaging intrusion. Then, how long are visitors expected to stay before this happens? Is NG referring to repeat visitors? This statement appears to PWP to be a nonsense.
- 8.4. It is suggested elsewhere that a mitigating factor is that pylons are only installed in areas of low population and that residents will become accustomed to the pylons. The low population qualification argument is not valid for a tourist region. Tourists visit because of the tranquillity and lack of development. As a *reductio ad absurdum* the NG's argument would imply that deserted wilderness areas with no inhabitants could be desecrated because they had no 'receptors' and no socio-economic outlets. PWP does not agree that visitors will become accustomed to massive pylons and wirescape; 'some' visitors, as NG acknowledges, will be deterred. Loss of 'some' of the Lake District's 17.3 million visitors in 2015 spending £1.2 billion is a substantial effect. Many of the approximately 300,000 visitors to Ravenglass and Eskdale railway and Muncaster Castle in 2014 would pass through the area via the A595, as would many visitors to Wasdale and Eskdale. The A595 is one of the main gateways to the west of the LDNP, which contains the Park's most famous landscapes.
- 8.5. What is the justification for not taking account of WHS submission on areas within or around LDNP and their contribution to increased tourist numbers? This issue has been overlooked and indicates that analysis regarding impact on tourism has been inadequate and/or non-existent. We refer to this in section 11 below on the Whicham Valley.

## **9. Adequacy of consultation process**

### *Visual reality presentations and photomontages*

- 9.1. The quality of the visual reality presentations has been poor, and they give a highly misleading impression.
- 9.2. The photomontages are mostly panoramas, with the pylons shown in the distance. This gives the impression that they do not have much visual impact
- 9.3. The photomontages show only a single connecting wire for each phase – in reality there would be three wires, making 18 in all. PWP believes that the wirescape itself is an important part of the negative visual impact on the landscape.
- 9.4. In many cases the text makes assertions that NG's own visual material shows to be untrue. As one example, it is suggested that for Ladyhall the pylons as viewed from the south will appear backgrounded against the south-west fells of the LDNP. This is directly contradicted by NG photomontage PEI\_7.15.4\_E2\_573 No. 2. , taken from the causeway at Shaw Moss, where a new pylon is shown rising three-quarters above the skyline. This is a very good example of a magnificent view from just outside the National Park, looking into it. Scafell Pike, the highest English peak, can be seen through the

gap in the closer hills. From a position only a few metres away from where the NG photo was taken, the 400kV pylon would completely obscure the view of Scafell Pike. Many others examples could be cited (see section 11). These examples of misleading information cause PWP to again question the adequacy and the sufficiency of the consultation process.

#### *Feedback form*

- 9.5. PWP believes that question 6 on costs has been designed to frighten people into believing that their electricity bill will rise dramatically. For example, the first part asks “Do you think we would be right to:  
a) Spend approximately £465 million to reconfigure and remove parts of Electricity North West’s distribution network to make way for and reduce the effects of our proposed 400kV connection?”  
This question is ridiculous. There is no breakdown of this cost. Almost no-one will be able to understand what this figure is for. PWP has requested a breakdown, but none has been forthcoming.

### **10. Summarizing the case for mitigation round the Duddon Estuary**

- 10.1. All the impacts referred to above were previously raised by many respondents in the previous consultations. We believe that the depth and extent of the outrage expressed in the current round of consultation will be even stronger.
- 10.2. According to NG’s proposals the Duddon Estuary is now the only part of the connection from Moorside to Heysham that is proposed as an OHL. It is hard to see why the landscape and visual effects of these lines here are less harmful than those elsewhere. The landscape round the Duddon valley is scenically comparable to that elsewhere in the route so it is difficult to see why it has been singled out. Magnificent views of the LDNP, including the Scafells, are offered from the Duddon Estuary, and PWP does not believe that these should be considered less important than the views of Snowdonia from the Afon Glaslyn estuary, which NG were concerned to protect. NG’s own photomontages clearly show the harm (see paragraph 9.2).

### **11. Case study – Whicham Valley**

- 11.1. The decision that the harm caused to the Whicham Valley from the proposal is not sufficient to warrant it being further carried forward as a focus area is particularly perverse, stemming mainly from a cynical approach to the setting of the LDNP: in places the pylons are proposed to be 10 metres from its boundary. By whatever tabular grids and pseudo-scientific methods this conclusion is reached, the findings of NG itself that the pylons will oversail the park, and that they will be viewed as ‘stacked’ from some viewpoints must surely merit the Whicham Valley’s candidacy for mitigation. We have therefore used this section as a case study, picking up on many of the points made above in an attempt to reveal the lack of logic that permeates NG’s work.
- 11.2. The landscape category status used by National Grid on the landscape in the Whicham Valley does not comply with that produced by Natural England, or that produced by the LDNPA. The result is irreconcilable contradictions between differing documents (see Preliminary Environmental Information (PEI), Volume 2.2, Ch. 6, para 6.4.2).
- 11.3. Ref 6.17 in Chapter 6 of Volume 2.2 of the PEI documentation is to The Cumbria Landscape Character Guidance and Toolkit. This document uses Cumbria County Council maps, which do not show the LDNP LCAs, but for the south-west Cumbria map area (which includes the Whicham Valley), the valley outside the LDNP and the outlier fells such as Lowscapes Bank are in area 11a. The Foxfield line of hills is also 11a. Under a heading of ‘Changes in the Landscape’, this document warns, in relation to this

area, that *'Upgrading the national grid and the development of more large scale wind energy schemes could erode the open and generally undeveloped character, particularly close to national landscape designations.'*

- 11.4. Ref 6.18 is to the parallel report on the LDNP. This uses LDNP Landscape Character Assessment (2008). In this assessment, Whicham Valley is area 61 (p. 226). The valley is one entity, and there is no attempt to differentiate between areas on either side of the LDNP boundary. On p. 8 this document says:  
*'The Lake District National Park boundary defines the Study Area (see Figure 1.1). However, landscape character units may not necessarily coincide with administrative boundaries. Therefore the assessment also considers landscapes outside, but immediately adjacent, to the Park boundary. This approach helps place the Lake District's landscapes in the context of Cumbria's landscapes as a whole (see Section 3.0 for details).'*
- 11.5. Another way of looking at the situation is that there is an unnatural and unjustified dichotomy in the National Grid assessment of the landscape in the Whicham Valley, between the area within and outside the LDNPA, characterizing the area within the LDNP as High Fells Fringe (LCT J), but Lowscales Bank area as upland fringe of county interest only (LCSDT 11a). There is no such distinction in the assessment by Natural England, which places the outlier hills to the south of the Whicham Valley in National Character Area 8 as Cumbria High Fells. The landscape assessment document produced by Chris Blandford Associates for the LDNPA also does not attempt to divide the Whicham Valley, but regards it as a single entity for landscape assessment. It is all placed in area J – High Fells Fringe.
- 11.6 High Fell Fringe is defined in the LDNP document map of landscape characters (p. 75). This and NG's own overview map place the whole of the Whicham Valley and the fells to the south within consistent landscape areas; either J - High Fell Fringe, or Cumbria High Fells. NG appears to have ignored the LDNP landscape character map, and the Natural England system, and its own overview map, but has adopted an appraisal which is more suitable to comply with its own pylon proposals.
- 11.7. In making an assessment of the landscape aspects of the pylons in the Whicham Valley (and this is a formulaic approach which is applicable elsewhere in the documentation) NG presupposes that the existing pylons are an acceptable part of the scenery, and that replacing them with larger pylons therefore does not amount to a significant change. The misjudgements here are discussed above in in section 2.
- 11.8. Much of the NG assessment in terms of landscape impacts is inevitably subjective. There are at present no obvious and intrusive man-made features that visually affect views within the Whicham Valley *except* for the current pylons. They form one thin, solitary line of industrialization along the otherwise tranquil natural landscape. They have blighted this scene for 65 years. NG's position, that the current landscape *with pylons* should be used as the base platform for judging the merits of replacement pylons of twice the size, must be on shaky ground (see further section 2).

#### *Holford Rules*

- 11.9. Within the consultation documents there is a frequent reference to complying with a requirement to background the pylons, as if that achieves sufficient mitigation. PWP has photographic evidence that show that in the Whicham Valley, the current pylons are 'backgrounded', but the similarly sized communication mast on the hilltop is outlined again the sky. Yet both features stand out in a similar way. It is clear that in this instance, in the Whicham Valley, "backgrounding" against the hillside makes the pylons

just as visible as pylons against the skyline. It also justifies the assertion that simply seeking to “background” pylons is not a suitable strategy for certain landscape situations. From the viewpoint of a person travelling through the Whicham Valley from Po House towards Dunningwell the existing pylons appear against the background from different perspectives; and they breach the skyline in a number of places. It is therefore quite unrealistic for NG to claim that the new, much more massive pylons, would be ‘backgrounded’.

- 11.10. To take a fictitious but not irrelevant example, say that National Grid planned to run a line of pylons up Wasdale. The pylons would be completely backgrounded, and would not normally be visible at all against the sky, except in certain very specific places, for instance when looking down the middle of the valley towards the sea. On that basis, does National Grid think that such a route would therefore be acceptable? The application of rules by rote can produce nonsense when context is ignored.
- 11.11. Rule 1 of the Holford Rules is as follows:  
*‘... multiple routes should be considered as an integral part of environmental statements. Rule 1 also implies an obligation to protect areas designated for, or otherwise recognised as being of the highest amenity value. This rule also obliges consideration of alternative routes that avoid such protected sites, even if the proposal is a direct replacement of existing structures and transmission lines that presently run through protected areas.’*
- 11.12 NG has taken the view that least harm is done by essentially following the existing line of pylons in section E1, rather than considering an entirely different route. While in the strict technical sense the pylons in the Whicham Valley do not lie within the LDNP, they incontestably lie within “the setting”. Moreover, even if this interpretation were to be perversely ignored, the fact that they are planned to be so close to the LDNP boundary, shows that the NG plan has a cynical adherence to rules that suit its own agenda, and a complete disregard for the negative consequences.
- 11.13. It is clear that NG disregards the impacts just outside the LDNP – the following is a typical example from the Whicham Valley focus area assessment:  
*“... the magnitude of impact would be **Negligible** as visitors become accustomed to the taller 400kV structures and the level of effect would be **Negligible**.”*
- 11.14. How can NG justify this statement (as one of many), based on a view just outside the LDNP, yet a few metres away? This conclusion would run counter to NG’s recent decision to remove the pylons from western edge of the park, and to underground the route there.
- 11.15. In fact since the Holford Rules were first proposed, progressively greater importance has been given to users of highways and rights of way. This is especially important with respect to developments such as overhead grid connections near to regional and national parks, whose users are walking rights of way largely for an appreciation of the aesthetic quality of the landscape within the park, but also in outlying areas. The fact that the whole of the southern flank of Black Combe is ‘open access’ means that the current pylons are very visible and intrusive in the landscape over an area of several square kilometres. Replacement pylons of twice the size would be even more visible and intrusive. This would create a completely unacceptable view from a nationally recognized landmark such as Black Combe, and a summit from which William Wordsworth was inspired to write poetry which still has a relevance today.

- 11.16. The actual landscape images taken around the Whicham Valley from Lowscapes Bank, from the A595 near Becksides Farm, and from Whitehall Knott, play down the impact of the current pylons by having an inadequate resolution. The web-based images, plus photomontages, do have conditions and provisos attached, which indicate the potential for loss of quality. But none of these images shows the connecting wires, or the insulators, whereas images which PWP has taken from a similar distance, at appropriate angles, do show these features.
- 11.17. The panoramic format of the images extracted from the NG web site suggests they are in fact three combined images, and the relatively small size of the resultant files strongly indicates that they are far removed from the original images, and have been photo-reduced. This implies a very significant reduction in quality from the original. Given the poor resolution which has been achieved (without going into too much technical detail), it is hardly surprising that the pylons appear unnaturally bland, and lack detail and clarity. To conclude, these images are not fit for purpose.
- 11.18. Since the photomontages are based on digital manipulation of the same images, further comment is unnecessary, except to indicate that the pylon structures depicted show no insulators, or the connecting wires. They are therefore an unrealistic representation of the NG proposals.
- 11.19. The virtual reality images, of both current and projected pylons, at a known location in the Whicham Valley, have been compared with real images of pylons in the landscape. The virtual reality representation is so poor as to appear at the level of sketches made by a child. Comparing pylons at a similar distance of, say 1 kilometre, actual pylons appear quite well defined, including insulators and cables. At a similar distance in the virtual reality display of the current landscape, it is often unclear as to what are actually pylons in the landscape: some are completely unidentifiable, whilst some could be walls aligned on a hillside, or even trees without leaves. Again, this amounts to a gross misrepresentation of reality. It is completely underhand for NG to present these visualization facilities, the actual images, and the photomontages, as if they are an acceptable tool with which the public, both locally and across the UK, might make a visual judgement of the merits of the plans. This is a further example of NG's manipulation of reality to justify its proposals.

#### *Socio-economic impacts*

- 11.20 NG has, at least in the Whicham Valley focus area, dismissed the negative impacts on the landscape, and on visitor appreciation, in a subjective and trivialising manner. The construction phase will be very disruptive to traffic, and therefore so will visitor access. Since the project by its very nature is linear, and access to west Cumbria is similarly constrained by the limited road network which follows much the same route, it is therefore not relevant that impacts on any one location will be of a short duration. The NWCC web project overview has the following quote: "*Subject to consent being granted construction would start on the new connection in 2019. We think it would take approximately six years to build and test the whole connection, so it is ready to export electricity from Moorside in 2024.*"
- 11.21. Road access is the only realistic option (road is the only practical mode of transport for most tourists); but the road network is susceptible to bottlenecks that can cause problems for the whole network between the A595 at Whitehaven, and the junction at Grizebeck with the A5092 to Greenodd, which means the likelihood of several years of travel disruption to the whole area.

- 11.22. NG dismisses this construction phase as not relevant since it is short term. But many of the business concerns have small margins, and depend on regular trade. A significant disruption of (say) one year would cause real problems for such businesses, and for travel disruptions to last two or more years would probably cause many businesses to go under permanently. The local economy is not resilient, with a robust and diversified economic base, and it does not have the benefit of alternative attractions for visitors.
- 11.23. NG also dismisses the visual impacts as not of high importance because of the low number of actual tourist-based businesses. This argument cannot be accepted as reasonable. NG itself recognizes the peace and tranquillity aspects of the Whicham Valley – a peace and tranquillity which would not co-exist with large number of socio-economic outlets, such as are found in more populated parts of the Lake District.

## **12. Duddon Estuary crossing and Foxfield**

- 12.1. The dismissal of the Duddon Estuary crossing as warranting further mitigation is based on a number of questionable assumptions. The most obvious of these is found at paragraph 6.4.157, where it is stated that although the harm to the Duddon Estuary landscape is major/moderate adverse, it is not particularly significant (according to NG's own definition) because it falls outside the LDNP. The finding of lack of harm fails if the Duddon Estuary is acknowledged as part of the setting of the LDNP, and if views looking into the LDNP are given their rightful importance.
- 12.2. The claim that the pylons would be backgrounded is substantially false. At several points it is stated that, because of the existing line, the pylons would be a more prominent feature but would not alter the balance or composition of the landscape. But to take specific examples, from Ladyhall viewpoint E2 574 the new pylon MR-O1-113 would be 67% above the skyline as against 33% for the existing one. The existing pylons are almost entirely masked by a mature plantation of trees, but 75% of the new pylon would be seen, which shows how ineffective the trees are at masking. For new pylon MR-O1-114, 33% would be above the skyline, whereas none of the existing pylons are above the skyline from the same viewpoint. From this viewpoint an additional six pylons would be seen above the skyline.
- 12.3 NG's own photomontages clearly indicate the harm.

## **13. Kirkby in Furness and The Green**

- 13.1. PWP has not covered the substantial harm to Kirkby-in-Furness or the area around The Green in this representation in any detail, as we believe that other campaign groups there will be making their own representations.

## **14. Alternatives**

### *Alternatives to Moorside–Heysham south connection route*

- 14.1 There have always been pylon-free alternatives for this project. PWP mentioned several in its July 2015 response (attached). They will not all be repeated here and some may no longer be relevant. PWP believes that all of the following options are feasible and preferable to pylons around the Duddon Estuary (NG's preferred route option).

### *Moorside–Heysham offshore subsea HVDC*



14.2. PWP still believes that this is by far the best solution. There are many environmental problems with all of the other options, which NG has itself already identified. This option avoids the majority of them. There was overwhelming support for this option from respondents to the 2014 consultation. PWP notes that NG document 2.8.11 refers to this option with a new estimate of £3.5 billion. This reference would seem to imply that NG still considers this to be a feasible option.

14.2.1. NG's previous rejection of this route appears to be based on two areas: technical difficulties and costs.

14.2.2. **Technical Difficulties:** NG refers to HVDC as '*untested technology for the connection of a nuclear power station*'. However, PWP has good reason to believe that these concerns have been exaggerated. This view is based on information from the Office of Nuclear Regulation, Siemens (HVDC converter station manufacturer), the WYG consultancy report, and the recent Ofgem document *North West Coast Connections – Consultation on the Project's Initial Needs Case and suitability for tendering*. The Ofgem-commissioned *TNEI report* states '*Whilst we do not agree with the discounting of HVDC solutions on the basis of technical grounds alone, there is strong justification for discounting on the basis of cost*'. See below for comments on cost.

Power Without Pylons commissioned research and a technical report from Dr Balarko Chaudhuri, Senior Lecturer in the Control and Power Research Group at the Department of Electrical and Electronic Engineering at Imperial College London. An acknowledged expert in the field of HVDC, Dr Chaudhuri's work includes research sponsored by National Grid and consultancy to Ofgem and the UK government. In his report to Power Without Pylons, Dr Chaudhuri concurs that the use of HVDC in this application is technically feasible.

14.2.3. All of these sources lead us to believe that these technical difficulties do exist, but that they are not very significant. NG has never stated that this option is not feasible.

PWP assumes that NG has continued to carry out design work on this option, which would obviously be the rational approach given the likelihood of the rejection of the current proposals by the PINS, on the grounds of ignoring the protected setting of the LDNP and the others that are outlined above.

14.2.4. It was reported that the CEO of NuGen stated that the use of HVDC would delay the project by four years. However, Dr Chaudhuri believes the delay should be no more than one year. NuGEN has now stated that they do not recognize this comment, but unfortunately they have not given us an alternative estimate. If HVDC subsea was used for the southern route element of this project, it would not need to be part of the NSIP, and therefore development time would be available.

14.2.5. PWP has recently requested more information from both NG and NuGen in order to improve its understanding of the technical issues, but none has been forthcoming.

This failure to supply information needed to discuss the project amounts to an abuse of the consultation procedure.

14.2.6. **Costs:** The cost of this option was originally estimated in 2014 by NG at £1.8 billion. Now the estimate has almost doubled to £3.5 billion. PWP has requested

an explanation for this, but, again, none has been forthcoming. Dr Chaudhuri does not believe that this increase can be justified.

14.2.7. The extra cost of this HVDC option over and above the NG-preferred route is approximately £700 million or 25% (NG figure). £700m of capital expenditure equates to 70p on annual electricity bills (NG figure). This would easily be justified by potential lost tourist revenue over (at least) 50 years. PWP further believes that the strength of the opposition to NG's preferred route amounts to an expression of willingness to pay this extra cost.

14.2.8. However, if this grid connection project is considered as part of the whole Moorside power station project, the extra cost of any no-pylon alternative route is indeed a very small proportion of the total cost.

14.2.9. The Ofgem document quoted above throws doubt on the accuracy of NG's estimate for the Kirksanton–Rossall/Heysham route. If that estimate is incorrect, perhaps the HVDC estimate is also incorrect. There is no way of judging without more information.

14.2.10. Examination of alternative solutions is a necessary and legitimate part of the planning process. As mentioned above, NG, NuGen and the Office of Nuclear Regulation (ONR), have failed to provide us with sufficient information in this regard. PWP and other potential participants in the planning enquiry cannot satisfactorily make a proper challenge to NG's plans without it.

14.2.11. PWP is extremely concerned that by the time that this issue comes before the Examining Authority, NG will be able to say that there is no longer enough time in the schedule to resolve the technical difficulties of the HVDC option. It seems to us likely that this is why NG and NuGen are delaying the provision of information to us.

### *Kirksanton–Rossall/Heysham (K-R) offshore subsea HVAC*

- 14.3. NG document 2.8.9 provides details of this option. In PWP's view, this is an acceptable second-best alternative, as it avoids the long stretch of pylons in NG's preferred route. This option would, of course, be in addition to the undergrounded stretch within the LDNP.
- 14.4. Ofgem, in the document quoted above, appears to believe that this option is no less preferable than NG's preferred route, and that the cost of the Morecambe Bay tunnel element of the NG-preferred route is more likely to overrun.
- 14.5. **Cost:** The NG estimate for this option is £200 million over and above NG's preferred route. This is not significant and represents 7% increase in cost; it becomes negligible when regarded as part of the cost of the whole Moorside power station project. This extra figure appears to represent a total sum of £1.5 billion, using the current NG estimate of £1.2 billion for the Morecambe Bay tunnel (the cost of which would be avoided using this option). Ofgem also throws doubt on the accuracy of NG's estimate for the K-R option; in their opinion the cost should be similar to that of NG's preferred route.

### *Duddon tunnel*

- 14.6. The NG document 2.8.5 provides details of this option. This avoids the stretch of pylons around the Duddon Estuary, but not across the Furness peninsula. The NG estimate for this option is approximately £250 million over and above NG's preferred route.

### *Kirksanton–Walney offshore subsea HVAC*

- 14.7. This is another partial offshore option which would avoid the long stretch of pylons in NG's preferred route.

### *Underground through the Whicham Valley, around the Duddon Estuary, and across the Furness peninsula*

- 14.8. This is probably the most expensive of the alternative options – but is feasible as a last resort.

## **15. Electricity North West (ENW) – 132kV**

- 15.1 The NG plans now show an additional OHL, a 132kV Trident line, around the Duddon Estuary. This is the first consultation in which it has been shown.
- 15.2 PWP believes that this OHL 132kV line has been added solely to connect the proposed Haverigg wind farm. The wind farm is almost certainly not going to get built now, due to the withdrawal of onshore wind subsidies, and the developers have withdrawn their request to ENW for connection. PWP assumes that this 132kV Trident line will therefore not now be built, unless it is planned to be constructed just as a temporary structure for the construction phase.
- Although there is a lack of clarity about this in the documentation, it would appear to us that ENW were expecting to obtain funding from NG for this project (part of the £465 million mentioned by NG for ENW 'reconfiguration').

### *Costs*

- 15.3 PWP has requested a breakdown of the ENW element of this project but, along with other information requests, this has been ignored. However, the cost of this 132kV Trident line must be significant. Now that it will not be required, the funds could help provide a pylon-free alternative for the 400kV connection.

The issue has unnecessarily complicated the entire consultation. Most of those concerned about NG's proposals will not be able to understand the ramifications or respond effectively. This is particularly true given the very short consultation period, compounded by the very short notice given of the consultation start date.

### *Security of supply to Barrow*

- 15.4 This appears to be another issue which has not been mentioned before. There has been speculation that some of the ENW "re-configuration" mentioned by NG is related to this issue. Again, this appears to be a local issue which should not be allowed to impact on considerations for the 400kV connection.

## 16. Cumulative effects

The following comments are made solely in the context of the NWCC project being inextricably linked to the Moorside project. They in no way imply criticism or disapproval of the Moorside project.

- 16.1. Under policy EN1 'cumulative effects', NG need to give reasons regarding why the Moorside project and this project have not been considered together. It appears that there are two consultations running in parallel. The cumulative effects are raised as an issue in the PEI, and the summary states that *'based on current information, the construction, operation and decommissioning of the Moorside Project (MPS, accommodations sites, associated development, and railways), when considered in combination with the Project, is likely to give rise to some potential significant cumulative effects'* but no further detail is given regarding these. Stakeholders have therefore not been able to respond to identified effects in the way proposed by EN1. This issue undermines the adequacy and sufficiency of the consultation process. The SoCC explains that the Moorside project is subject to a separate DCO to be prepared and submitted by NuGen. The SoCC addresses the proposed pylon route only and does not address cumulative effects arising from the Moorside project.
- 16.2 Another form of cumulative effect is represented by other existing industrial-type development in the area, such as wind farms. As with the existing 132kV OHL, it is not valid to use the presence of existing vertical infrastructure to justify the addition of more. For example, the view sea-wards down the Whicham Valley is blighted not only by the existing pylons, but also by the offshore wind farm.

## 17. Next steps

- 17.1 PWP believes that the arguments in this response will receive a favourable hearing from the Planning Inspectorate during the Inquiry into the DCO application, where it looks forward to providing more evidence and detail to support the contentions outlined in this brief submission.
- PWP will be registering as an interested party and we will be representing to the Examiners all the issues raised in this and previous consultations and holding the applicant to account. There are many concerns that have been raised in this and the previous consultation and we aim to ensure that all avenues of legal redress will be pursued.

## 18. Response data

- 18.1 PWP is requesting full access to the response data following the end of the consultation. We recognize that NG is bound by the Data Protection Act, but it must be possible to provide redacted data that does not show names and addresses.

## **19. Conclusions**

- 19.1. PWP considers NG's assessments and criteria to be flawed and considers the EIA and the conclusions drawn from it to be invalid.
- 19.2. For all the above reasons PWP and its supporters firmly reject the proposals put forward by NG to overground the connection around the Duddon Estuary. This view is shared by most of those living in the area for many of whom the landscapes are the basis of their livelihoods. It is also shared by many people living outside the area, who cherish these landscapes and are passionate that they should be preserved. NG should therefore give more serious consideration to the alternatives outlined above, including providing transparent and robust costings.