

## Campaign for National Parks response to the North West Coast Connections consultation

### Overview of the project - overall comments

#### Do you have any overall comments on the North West Coast Connections project?

The Campaign for National Parks believes that the 'offshore south' route should be chosen because:

- It removes the need to take pylons and overhead lines through or near to the Lake District National Park and minimises damage to protected landscapes. This is the only route option which ensures that the National Park is protected from major infrastructure development.
- It does not undermine the statutory purposes of the National Park. Choosing this option would demonstrate that National Grid has taken account of its duty to have regard to National Park purposes as set out in S62 of the Environment Act.
- It will secure the future electricity supply without significant damage to the environment of Cumbria and Lancashire.

We believe that the preferred route, 'onshore south with tunnel' and the 'onshore south' route via Kendal are both unacceptable because:

- Both routes would require new pylons and overhead lines in and close to the Lake District National Park. This is particularly inappropriate at a time when significant investment is going in to reducing the impact of existing lines and pylons on protected landscapes through the Visual Impact Provision.
- The protected landscape of the National Park would be significantly damaged by larger pylons and associated infrastructure.
- National Grid is putting construction costs ahead of landscape and environmental damage in a National Park by selecting this as their preferred route. If proper account is taken of mitigation and consideration is given to the costs of putting the line underground wherever it runs in or close to the National Park, then this option would be more expensive than the 'offshore south' route.
- There is an alternative route that can avoid damage to the National Park.

The comments we have submitted here are consistent with our response to the Strategic Options consultation in 2012. We note that the 2012 consultation identified overwhelming support for the 'offshore south' option because it has the least impact on the landscape, natural environment and communities of the south and west of Cumbria.

We are particularly concerned that the cost comparison information included in this consultation may be inaccurate as it may be considerably more expensive to implement the onshore options once the need to underground sections of the lines to prevent damage to protected landscapes, is taken into account.

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### Onshore South with Tunnel - overall comments

#### Do you have any overall comments on the Onshore South with Tunnel under Morecambe Bay group of corridors?

The Campaign for National Parks objects to the 'onshore south with tunnel' route because:

- This route would require new pylons and overhead lines in and close to the Lake District National Park. This is particularly inappropriate at a time when significant investment is going in to reducing the impact of existing lines and pylons on protected landscapes through the Visual Impact Provision.
- The protected landscape of the National Park would be significantly damaged by larger pylons and associated infrastructure.
- National Grid is putting construction costs ahead of landscape and environmental damage in a National Park by selecting this as their preferred route. If proper account is taken of mitigation and consideration is given to the costs of putting the line underground wherever it runs in or close to the National Park, then this option would be more expensive than the 'offshore south' route.
- There is an alternative route that can avoid damage to the National Park.

Given our overall objection to the 'onshore south with tunnel' option, we have not commented on the individual sections of this route.

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### **Offshore South - overall comments**

#### **To what extent do you agree with this view and why?**

The Campaign for National Parks does not agree with the view that the 'Offshore South' group of corridors should not be progressed in preference to the 'Onshore South with Tunnel' group of corridors.

We believe that the 'offshore south' option should be chosen because:

- It removes the need to take pylons and overhead lines through or near to the Lake District National Park and minimises damage to protected landscapes.
- It does not undermine the statutory purposes of the National Park. Choosing this option would demonstrate that National Grid has taken account of its duty to have regard to National Park purposes as set out in S62 of the Environment Act.
- It will secure the future electricity supply without significant damage to the environment of Cumbria and Lancashire.

We note National Grid's own evaluation in the Main Report which states that "The Offshore South emerging preferred route corridor performs best in respect of landscape, seascape and visual considerations, as there would be little effect from the offshore circuits. It also performs well with regard to the historic environment and ecology." The primary reason for ruling out this option appears to be on cost grounds but once account is taken of the additional cost of undergrounding sections of the line to avoid damage to protected landscapes, then this argument no longer applies.

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### **Onshore South - overall comments**

#### **To what extent do you agree with this view and why?**

We agree that the 'onshore south' route options should not be progressed. However, we do not support the view that this should be in preference to the 'onshore south with tunnel' route options.

We believe that both sets of options are unacceptable because:

- They would require new pylons and overhead lines in and close to the Lake District National Park. This is particularly inappropriate at a time when significant investment is going in to reducing the

impact of existing lines and pylons on protected landscapes through the Visual Impact Provision.

- The protected landscape of the National Park would be significantly damaged by larger pylons and associated infrastructure.
  - National Grid is putting construction costs ahead of landscape and environmental damage in a National Park by selecting this as their preferred route. If proper account is taken of the need for mitigation and consideration is given to the costs of putting the line underground wherever it runs in or close to the National Park, then this option would be more expensive than the 'offshore south' route.
  - There is an alternative route that can avoid damage to the National Park.
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### **Consultation process - comments**

#### **Do you have any comments on this consultation?**

We welcome the efforts that National Grid has made to involve as many people in the consultation process as possible.

We do not consider that a decision on best value can be made using the cost estimates provided in the consultation without proper discussion of mitigation at this stage. Once account is taken of the costs of undergrounding sections of the line in or close to the National Park, the 'offshore south' route compares far more favourably so we do not believe that enough information is provided in the current consultation process for a decision on the routing to be made.

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