PortfoliO: Councillor Jonathan Brook - Housing and Innovation Portfolio Holder

Report from: David Sykes, Director, People and Places

Report Author: Lorayne Woodend, Development Strategy Delivery Officer

Wards: All (particularly affected are Broughton and Low Furness)

Key decision: In Forward Plan

1.0 Expected outcome

1.1 The National Grid North West Coast Connections project will be one of the largest investments in infrastructure in the North West of England for 50 years. It will deliver new 400kV electricity transmission lines connecting the proposed Moorside Nuclear Power Station with the National Grid Network. National Grid is consulting on a detailed route proposal and associated works for this connection. The expected outcome of this report is that the opportunity to influence the proposals is taken up in order to help ensure the best outcome and greatest benefits for the residents of South Lakeland.

1.2 South Lakeland District Council is a statutory consultee and this report sets out a proposed response for approval by Cabinet

2.0 Recommendation

2.1 It is recommended that Cabinet:-

(1) Approves the draft response set out in Appendix 1, supported by Appendix 2, as South Lakeland District Council’s response to the NWCC consultation (subject to Recommendations 2 and 3); and

(2) Authorises the Director – People and Places, in consultation with the Portfolio Holder, to approve, on behalf of the Council, the Preliminary Environmental Information technical response prepared by the consultant team on behalf of the local authorities within the Planning Performance Agreement group; and
(3) Authorises the Director – People and Places, in consultation with the Portfolio Holder, to make changes to the draft response prior to submitting it to National Grid for a) any non-substantive changes required to the Draft Response, including any changes and b) changes required in light of the content of the updated technical response once received.

3.0 BACKGROUND AND PROPOSALS

3.1 The existing 132kV Electricity North West distribution network, which runs around the coast of Cumbria, is insufficient to accommodate the connection of the new 3.4 GW nuclear power station at Moorside, near Sellafield. Moorside was identified by the government as one of 5 new nuclear sites planned across the UK to be operating by 2030.

3.2 National Grid is required to connect Moorside Nuclear Power Station via four transmission circuits (two 400kV double circuits) to the existing transmission system ready to be operational by 2024. There is also a need to export power generated by other new energy projects in the North West, such as offshore wind farm projects. Work is expected to begin in 2019 subject to approval of an application for the works.

3.3 The National Grid North West Coast Connections project will be one of the largest investments in infrastructure in the North West of England for 50 years and is categorised as a Nationally Significant Infrastructure Project (NSIP). This means the project will be decided by the Secretary of State, rather than local planning authorities, through the Development Consent Order (DCO) process.

3.4 The expected timetable for the project is as follows:
   - DCO application submitted April 2017
   - Prepare Local Impact Report Summer/Autumn 2017
   - Examination Nov 2017 to April 2018
   - Consent (if secured) October 2018
   - Construction 2019 onwards
   - Operation begins 2024

3.5 Following earlier consultation in 2014, National Grid have used consultation responses and further studies and assessments to work up the preferred route corridor into a detailed route proposal, along with associated proposals for mitigation works and necessary supporting infrastructure. They are now consulting on this detailed route proposal.

3.6 South Lakeland District Council, along with other affected planning authorities in Cumbria and Lancashire, entered into a Planning Performance Agreement (PPA) with National Grid at the beginning of the process to enable it to engage in a positive way and reach an informed view on the impact of the proposals. This support is provided primarily by consultants White Young Green (WYG) as well as through working in partnership with the other authorities involved. WYG is preparing the technical consultation response to National Grid’s formal consultation on behalf of the PPA group. The PPA does
not compromise the rights of the local authorities to express their views or concerns on the project proposals and their local impacts.

3.7 South Lakeland District Council is a statutory consultee and has been heavily involved throughout the process to date, attending regular progress update and participation meetings and maintaining consistent involvement at an officer level in discussions around the wide range of issues involved in such a significant project. National Grid have also held a series of Member briefings, including, most recently, on 9 November 2016, to assist Members in keeping abreast of the project and its progress.

Proposed Route

3.8 The documents comprising National Grid’s consultation can be viewed on National Grid’s web site www.northwestcoastconnections.com. The detailed route proposed largely follows the preferred route corridor previously consulted on. The 400kV route of new 50m pylons enters South Lakeland in the Duddon Estuary, near Lady Hall, crosses to Foxfield, heads south to Kirkby in Furness and skirts the eastern edge of Beckside, in a diversion from the current route, before continuing south to leave the District close to High Mere Beck Farm on the A595. On this stretch, the new 400kV line will replace the existing 132kV line which will be removed.

3.9 The 400kV line re-enters South Lakeland at Standing Tarn, east of Dalton in Furness and then routes down the centre of the Furness peninsula, moving between South Lakeland District and Barrow Borough, but remaining close to the boundary until connecting to a proposed new substation at Roosecote Power Station in Barrow. Along this stretch, one of the existing 132kV lines will be replaces with the new 400kV line and the other 132kV will remain with some realignment. From here it is proposed that the tunnel under Morecambe Bay will start and therefore, the 400kV line is underground between Roosecote and the coast. However, a temporary tunnel inspection shaft within a temporary construction compound are proposed close to Peasholmes Lane, which lies very close to the South Lakeland boundary, including a number of residential properties and a caravan park.

3.10 In addition, for local supply and distribution purposes, a new 132kV line of 13m trident wooden poles is also being introduced from Kirksanton (in Copeland) right round the Duddon Estuary to Lindal in Furness. This line will enter South Lakeland close to Duddon Bridge. There are some sections where this 132kV line is undergrounded. There is also a short section where this line enters the Lake District National Park within South Lakeland.

3.11 Further to these proposals described above, a Tunnel Island in the middle of Morecambe Bay, which will support the operation and maintenance of the cross-bay tunnel for the 400kV route may also have visual impacts on South Lakeland communities and key views. As part of the project, the existing substation at Natland requires an extension comprising 4 new 132kV pylons on the west side of Sedgwick Road, directly across from the existing substation on the east of the road. These are a short distance from properties to the south and west of Natland.

3.12 The social and economic impacts (positive and negative), as well as the physical impacts of both the operational and construction phases impacts of
the project need to be considered careful now that significantly more detail is available than at the previous consultation.

**Proposed Response to Consultation**

3.13 The proposed SLDC-specific response to the consultation on the detailed route proposals can be found at Appendix 1. It sets out that:

- the Council still supports the Morecambe Bay tunnel option in principle.
- the Council would prefer to see a tunnel used to cross the Duddon, as this would avoid many of the issues with the proposals.
- As an alternative to a Duddon tunnel, the Council would also support an offshore connection, provided opportunities were not lost for future connectivity for new/growing industries or new energy supplies.
- If neither the Duddon Tunnel nor offshore options are deliverable in an acceptable way, the key concerns that the Council has regarding impacts around the head of the Duddon, Foxfield, Kirkby-in-Furness, south of Kirkby-in-Furness and through the Furness peninsula must be addressed.
- Mitigation measures to address these issues would include additional undergrounding, further re-routing, reduced additional infrastructure (such as Cable Sealing End Platforms) and greater rationalisation of the existing route through Furness.

3.14 The Council has also worked with the PPA Group authorities, supported by consultants WYG, to prepare a joint response to the proposals in the S.42 consultation, including the Preliminary Environmental Information report – PEIR (Appendix 2). This will be worked up into a more detailed PPA Group response, which will be submitted jointly with the support of all the PPA authorities under the delegation addressed by recommendation 2. Appendix 1 includes a summary of this response setting out the issues of key concern to the Council, relating specifically to South Lakeland.

**4.0 CONSULTATION**

*Previous Consultations*

4.1 South Lakeland District Council made a response to the first formal stakeholder consultation, following its approval by Cabinet in July 2012. The 2012 consultation considered six Strategic Route Options and the responses, along with further assessment, enabled National Grid to announce (in October 2012) two strategic options to take forward.

4.2 These two strategic options were scrutinised and within these, a series of potential route corridors developed. A 12-week consultation from 4 September to 28 November 2014 was undertaken by National Grid to gather views on the route corridor options, including National Grid’s identified preferred route corridor, based on detailed appraisal and assessment work.

4.3 National Grid’s preferred route corridor option affecting South Lakeland at that stage was ‘Onshore south with tunnel’ - a connection from Moorside to
Heysham via a tunnel beneath Morecambe Bay and a route largely following the existing route north through Furness and round the Duddon Estuary.

4.4 The Council’s response at that stage (see Appendix 3) broadly supported National Grid’s preferred option, whilst citing a number of areas where concerns remained and where mitigation measures would be necessary. The response also set out that the alternative routes (including routing through South Lakeland rather than using a tunnel under Morecambe Bay) would have negative consequences for South Lakeland and strongly advised no further consideration of these.

5.0 ALTERNATIVE OPTIONS

5.1 The alternative option is to decline to take part in this consultation and/or to decline to include the PPA response to support the Council’s response. Either would compromise the level of influence afforded by the Council in shaping the detailed route of the new National Grid connections, the associated mitigation and the supporting infrastructure. In turn, this would represent a lost opportunity to lobby formally for changes to the proposals that would reduce impacts on and bring enhancements for South Lakeland communities and landscapes.

6.0 LINKS TO COUNCIL PRIORITIES

6.1 The proposal to deliver connections for the new nuclear power station at Moorside has the potential to support economic, environmental and health and wellbeing Council Plan objectives in particular. The project will provide jobs – National Grid is committed to 1 in 5 jobs created being for local people - and will have supply chain benefits for local businesses. There are opportunities for reducing the impact of pylons on local communities and landscapes by altering the existing route and taking care over the choice and location of technologies and supporting infrastructure.

6.2 The project is also part of the Government’s wider energy package, which aims to reduce carbon emissions and support energy security. Responding to the consultation with the messages proposed will help to maximise support for these benefits as well as helping to minimise negative impacts.

7.0 IMPLICATIONS

7.1 Financial and Resources

7.1.1 This project does have resource implications, particularly in relation to staff time. However, the signed PPA means that SLDC’s costs, including staff time to attend meetings, consultation events and write reports, will be reimbursed by National Grid for this stage of the process. If SLDC, or the wider PPA wish to challenge National Grid once the DCO is submitted for Examination, the Council will have to fund the challenge itself, insofar as it relates to South Lakeland.

7.2 Human Resources

7.2.1 It is expected that the staff resource requirements of this project can continue to be met through existing SLDC staff resources (see also 7.1.1).
7.3 Legal

7.3.1 The proposed response at Appendix 1 relates to a pre-application consultation. In undertaking this ‘Section 42’ consultation, the applicant (National Grid) is fulfilling its legal obligation to consult with local authorities in the areas affected. National Grid must have regard to our response when formulating their application.

7.3.2 SLDC will only have further formal opportunities to comment on the proposals as part of the public Examination undertaken by the Planning Inspectorate once the application has been submitted. Once National Grid has made its application for consent, the Secretary of State will invite SLDC to submit a Local Impact Report under Section 60 of the Planning Act 2008. This will settle SLDC’s position on the likely impact of the project on South Lakeland.

7.4 Health, Social, Economic and Environmental

7.4.1 Health, social, environmental and economic impacts of the project are being taken into account through National Grid’s assessment work and in the proposed response to the current consultation. This includes a PEIR, on which SLDC officers have been consulted and which will develop into a full Environmental Impact Assessment as the project evolves further. In addition, as indicated above at 7.3.2, a Local Impact Report will be prepared at application stage identifying the likely impacts.

7.4.2 It is considered that responding to the consultation has no sustainability implications. The sustainability implications of implementing the project are taken into account as set out at 7.4.1 above.

| Have you completed and Health, Social, Economic and Environmental Impact Assessment? | Yes ☐ | No ☒ |
| If yes, please confirm that it is attached to the report in the appendices. | Yes ☐ | No ☐ |
| If you have not completed an Impact Assessment, please explain your reasons. | The relevant assessments have been undertaken as part of the assessments required for the project itself and have been influenced and commented on by officers throughout the process. They need not be repeated. Responding to the consultation, does not, in itself, have any health, social, economic or environmental effects. |

7.5 Equality and Diversity

7.5.1 An equality and diversity impact assessment has been carried out in accordance with the Council’s Equality Impact Assessment guidance and form for committee reports and is attached to the report as Appendix 4. The
assessment concludes that responding to this consultation will have neutral impacts in relation to equality matters.

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<td>Yes ☒</td>
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**Summary of equality and diversity impacts.**

Whilst SLDC has concerns about the length of the consultation period allowed and the ability of residents to fully engage with what is a technical topic and extensive consultation documentation, the otherwise commendable efforts of National Grid to enable access and engagement opportunities for as wide a range of stakeholders as possible (having taken into account SLDC’s and others’ feedback on consultation approaches), coupled with SLDC’s responding to the consultation representing residents and others’ interests, means that equality and diversity has been taken into account as far as possible insofar as it is within SLDC’s control.

### 7.6 Risk

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<td>Compromising the level of influence afforded by the Council in shaping the selection of the route of the new National Grid connections and in ensuring that appropriate mitigation (of impacts on communities and the landscape in particular) and wider community benefits are achieved through the project.</td>
<td>Approve the response, subject to any suggested changes.</td>
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CONTACT OFFICERS
Report Author - Lorayne Woodend, Development Strategy Delivery Officer (Development Plans) 01539 793383 l.woodend@southlakeland.gov.uk

APPENDICES ATTACHED TO THIS REPORT

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<th>Appendix No.</th>
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<td>1</td>
<td>Proposed SLDC response to the North West Coast Connections Detailed Route Proposals Consultation</td>
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<tr>
<td>2</td>
<td>PPA Headline Issues Report</td>
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<tr>
<td>3</td>
<td>SLDC’s response to NWCC route options consultation stage</td>
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<td>Equalities Impact Assessment</td>
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BACKGROUND DOCUMENTS AVAILABLE

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TRACKING INFORMATION

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RESPONSE TO THE NORTH WEST COAST CONNECTIONS DETAILED ROUTE PROPOSAL CONSULTATION – APPENDIX 1

PURPOSE OF APPENDIX

The purpose of this Appendix is to set out the response of South Lakeland District Council (SLDC) to the National Grid North West Coast Connections Detailed Route Proposal Consultation.

1 General comments

1.1 SLDC would like to express full support for the principle of developing a new and upgraded grid connection of sufficient capacity to serve the new nuclear power station at Moorside, in the interests of ensuring national energy security into the future.

1.2 Furthermore, SLDC recognises that many elements of the proposals currently being consulted upon are designed with the intention of mitigating the impacts of the project on South Lakeland, including the tunnel under Morecambe Bay. SLDC also recognises that many of its previous comments have been acted upon. These facts are both very much welcomed.

1.3 Whilst very much supporting the principle of the new connection, some of SLDC’s concerns still stand and now that the detailed proposals are available for scrutiny, some new concerns have arisen in relation to the proposals themselves. These concerns include that cumulative impacts - including with Electricity North West (ENW) works – do not appear to have been fully taken into account.

1.4 SLDC also has concerns regarding the Preliminary Environmental Information Report (PEIR) - namely the completeness of the information available (such as failure to supply adequate graphical representations showing the pylons and their associated infrastructure within the landscape to inform the assessment of their impact of the proposals on Grade I, II and II* Listed buildings and their setting); the methodology and resulting assessment of the options and the robustness of the mitigation proposals. In its response to the PEIR the Council has assessed the degree of harm to the significance of listed buildings including the Grade II* listed St Cuthbert’s Church in Beck Side, the Grade II Angerton Farmhouse and Barn in Foxfield, the Grade I listed Kirkby Hall near to Kirkby in Furness, and to the Grade II listed Sand Gap Farmhouse in Foxfield. The length of the consultation period when taken in the context of committee cycles and associated report lead-in times and the festive period is also of concern. These
aspects have all compromised SLDC’s ability to make a fully informed and considered response on the proposals.

1.5 SLDC’s specific concerns are detailed below but SLDC also supports the wider response of the Planning Performance Agreement (PPA) group as a whole (see accompanying Appendix 2, which constitutes a draft of the PPA response).

1.6 The PPA group response covers concerns under the following key topic areas:

- Landscape and Visual Impact
- Socio-Economics, Recreation and Land Use
- Tunnel Head Impacts at Barrow and Heysham
- Transport and Connectivity
- Terrestrial and Avian Ecology
- Historic Environment and cultural landscapes
- Cumulative Impact Assessment
- Lack of information and consultation timescales

Duddon Tunnel Option

1.7 SLDC would strongly urge further consideration of the use of a tunnel to cross the Duddon Estuary. Whilst the Options Appraisal report (Volume 2.8.5) concludes that the landscape effects of the proposals are ‘not particularly significant’, it also acknowledges that this approach ‘might be considered preferable’ in landscape terms.

1.8 SLDC contends that the landscape impacts around the Duddon Estuary, particularly when coupled with the unexpected proposals for a new 132kV trident line around the estuary and supporting infrastructure such as Cable Sealing End Platforms, are significant and affect the setting of the Lake District National Park (in addition to the proposed new 132kV tridents affecting a stretch within the National Park itself). The landscape around the Duddon Estuary performs an important role in views into and out of the Park as well as having its own inherent landscape value. The proposals would result in cumulative impacts on the landscape and communities.

1.9 SLDC further contends that there are also impacts beyond landscape impacts, including impacts on communities during construction and operational phases. These too would result in net detriment to the affected communities.

1.10 SLDC notes that if a tunnel under the Duddon was used, the existing 132kV lattice pylon line would remain in place, meaning that neither the proposed new 132kV wooden trident pole line nor its extensive supporting infrastructure such
as Cable Sealing End Platforms would be required. Similarly, using a tunnel would mean that the impacts of the new 400kV and the issues and impacts around Foxfield, Kirkby in Furness and Beckside, subject to some minor re-routing (as described in section 2), would also be avoided. These factors in turn would mean that the various proposed construction impacts, including large rail compounds, new access roads and helicopter landing areas around the Estuary would also be avoided. The cumulative, net detriments to landscape and communities would therefore be significantly less with the tunnel than currently proposed.

**Off-shore connection**

1.11 SLDC would also strongly urge further consideration of the offshore (undersea cable) connection between Silecroft and a point on the Lancashire Coast assessed by National Grid. This too would avoid many of the issues and impacts around the head of the Duddon, Foxfield, Kirkby in Furness and Beckside. SLDC would support such a connection provided opportunities were not lost for future connectivity for new /growing industries or new energy supplies.

1.12 Whilst it is accepted that either a Duddon Tunnel or an off-shore undersea cable route might be more expensive to deliver, the avoidance of impacts to communities, the landscape and other receptors is highly significant in this rural area of small, historic communities in the setting of the Lake District National Park. The impacts that would be avoided include construction impacts (noise, vehicle movements, compound operation) and the ongoing cumulative impacts of the siting and operation of increased height pylons with additional 132kV line and associated significant new infrastructure such as Cable Sealing End Platforms. The removal of these impacts offers opportunities for the overall impact of this project for South Lakeland to be of net benefit rather than net detriment.

1.13 However, if neither a Duddon Tunnel nor an undersea cable route can be delivered in an acceptable way, then other options could be supported subject to key concerns regarding impacts around the head of the Duddon, Foxfield, Kirkby-in-Furness, south of Kirkby-in-Furness and through the Furness peninsula being fully addressed. These are explained further in Section 2.

1.14 It should also be noted that even if the Duddon Tunnel or off-shore route could be delivered, avoiding many of the issues with which SLDC has concerns, two key issues would still remain and would require addressing. These are:

- Issue of existing route impacting on existing and allocated residential developments at Burlington Close/Burlington School, Kirkby in Furness – re-routing or undergrounding required to address this; and
• (In the case of the Duddon Tunnel) Issue of lack of any of the expected rationalisation of the dual pylon line through the Furness peninsula. In order not to have a net detriment to this area, a single 400kV line should replace the existing dual 132kV dual lines, instead of the retention of one 132kV line and replacement of the other with a 400kV line. The single 400kV line should follow the existing 132kV route.

2 Section E2 (Kirkby in Furness, Broughton in Furness and the Duddon Mosses and Estuary)

2.1 Regarding this section of the proposed route, SLDC very much welcomes the fact that some previous comments have been taken into account in relation to the alternative route corridor option proposed (e.g. north of Broughton in Furness) at the previous consultation stage and the routing around Beckside. SLDC also welcomes that the existing 132kV route along this stretch would be removed. However, SLDC does have concerns about the detailed route proposals and the location and type of supporting infrastructure on this section, including the impacts of the proposed new 132kV line.

Duddon Crossing stretch / Head of the Duddon

2.2 It is acknowledged that the proposed 400kV line follows the existing 132kV closely and that the existing 132kV line is proposed for removal. The 400kV line consists of significantly higher pylons and in addition, must be considered in terms of cumulative impacts with proposals for a new 132kV line that will also cross the Duddon further north (including a stretch within the Lake District National Park) and existing local distribution infrastructure. SLDC considers that this area forms part of the setting of the Lake District National Park and that a tunnel crossing of the Duddon or an off-shore route should be further explored in order to avoid these net detrimental landscape impacts. If these are not deliverable in an acceptable way, then further undergrounding of this stretch should be considered (400kV and newly proposed additional 132kV).

Broughton-in-Furness

2.3 It is considered that there are limited general impacts on Broughton-in-Furness itself in terms of residential amenity. However, views of listed St. Mary Magdalene church from Church Street may be affected by new, larger infrastructure in the background. Whilst the church is not in SLDC’s planning area (in LDNP) views of church from Broughton-in-Furness Conservation Area include a backdrop that lies outside the LDNP.
Foxfield and Angerton Marsh

2.4 SLDC acknowledges and very much welcomes that previous comments have been responded to in that a lower height lattice pylon is proposed to take the 400kV line over Foxfield Bank. However, despite this, the wider proposals mean that the Foxfield area is subject to quite a concentration of new lines and associated infrastructure, creating cumulative impacts, visual clutter and a net detrimental impact to the landscape and communities.

2.5 Additionally, at Foxfield, the proposed 400kV line deviates from the existing 132kV line route in order to sit on a lower part of Foxfield Bank. Whilst the principles of moving the route to a lower part of the Bank and using a lower height lattice pylon are welcomed, properties on Foxfield Bank, such as Hill Crest, will be only 85m from this pylon and only 30m from a new 132kV trident pole.

2.6 At Foxfield, the new 400kV line and the new 132kV trident line converge on the north-western side of Foxfield Bank. On the south-eastern side of Foxfield Bank, either side of the A595, will lie a Cable Sealing End Platform, which will enable the 132kV line to underground for a short stretch, and a full height lattice pylon. These will have significant cumulative visual and landscape impacts both together and with existing infrastructure and are proposed very close to residential properties (<20m in the case of e.g. Moss Cottage West).

2.7 At Foxfield, also proposed are two railway compounds, which will be associated with the construction phase of the project. One such compound lies to the immediate north west of Foxfield Station. The other lies south east of the most southerly point of Foxfield Bank. It is important that the compound minimises visual impact and disruption to adjoining properties and businesses.

2.8 Across Angerton Marsh, the proposed 400kV line deviates from the existing route in order to lie to the west instead of the east of the railway line, thus removing a stretch of the existing line from the Duddon Mosses SAC (although the proposed lines do still run through the Duddon Estuary SAC and Ramsar designations in places). The 132kV trident line also crosses Angerton Marsh along a similar route to the 400kV, although partly underground.

2.9 The 132kV trident line goes underground on the south-eastern side of Foxfield Bank, re-emerging just north of Angerton. It is then overground to Herd House Moss, where it undergrounds again, crosses the railway line and then re-emerges before overlanding to Marsh Side, where it undergrounds to Burlington School and then re-emerges again. At each site of re-emergence or undergrounding, a Cable Sealing End Platform is required; this is significant infrastructure with visual and other impacts and in some cases is very close to
the A595 (10m at one point and 2m at another, close to Burlington School and immediately adjacent an allocated site for residential development) and residential properties (<50m in the case of e.g. Burlington House, Marshside). The cumulative impacts of this, together with the 400kV line are significant. It could be mitigated by use of a tunnel to cross the Duddon or an off-shore route, both of which would avoid these net detrimental impacts. If these are not deliverable in an acceptable way, then further undergrounding of this stretch should be considered of both the 400kV (as suggested in our previous consultation response) and of the newly proposed additional 132kV. Relocation of Cable Sealing End Platform and / or alteration of the proposed route could also provide more minimal mitigation.

2.10 In this section, the Council also have concerns about some heritage receptors including potential to have net adverse impacts on Listed Buildings. These need to be given further consideration (see detailed comments in PPA response).

**Kirkby in Furness and Beckside to South Lakeland boundary**

2.11 From Wall End, the new 400kV line diverges from the existing 132kV route, heading further east up the hillside of Bank House Moor. It is acknowledged that this change is in response to earlier concerns raised about the impacts of the existing route on the community of Kirkby in Furness and Becksides, including on future residents of the site allocated for residential development adjacent Burlington School. It is also acknowledged that lower height pylons are being used for some of this diversion. However, concerns remain as the proposals mean that the Kirkby in Furness area will also be subject to a concentration of infrastructure and associated cumulative impacts and visual cluttering/confusion.

2.12 Although lower height 400kV pylons (37m) are used for a significant stretch of this section, the pylons are proposed on steeply rising land and it appears likely that several may breach the skyline from certain viewpoints. Additionally, on this stretch 400kV pylons that are of standard height (50m) are being used adjacent the main road (A595) just north of Burlington School through to immediately east of Beckside, which is already some way up the hillside.

2.13 The proposals will still have significant impacts on the landscape and residents around Kirkby in Furness, Becksides, High Bank House, Gargreave and Bailiff Ground, which are also impacted by the proposed new 132kV line.

2.14 As indicated at 2.13, at Marsh Side, the proposed 132kV trident route undergrounds, requiring Cable Sealing End Platform infrastructure, which is proposed immediately adjacent the A595 and close to residential properties. It then re-emerges again, requiring a further Cable Sealing End Platforms immediately adjacent to a site allocated for residential development in the South
2.15 The proposals show that after re-emerging at Burlington School, the 132kV line, crosses the Land Allocation. This involves a 132kV trident pole with backstays within the site and a standard 132kV trident pole on the site’s south-eastern edge. An alternative route should be considered that avoids this site whilst continuing to provide a net benefit for the existing residents, who are currently closely impacted by the existing 132kV lattice pylons in this area.

2.16 South of Burlington School, the proposed 132kV wooden trident pole route follows the existing 132kV lattice pylon route closely. However, two further Cable Sealing End Platforms are required very close to properties immediately south west of Bailiff Ground/Lane Head and at this point the new 400kV line converges with the new 132kV, creating cumulative visual impacts and visual clutter in the landscape as well as amenity impacts.

2.17 The cumulative impact of the 400kV line, the 132kV line and the infrastructure required for undergrounding and re-emergence is significant throughout this section, particularly compared to the expected outcome of the 132kV being removed completely.

2.18 Again, these issues could be largely avoided by use of a tunnel to cross the Duddon or an off-shore route. If these are not deliverable in an acceptable way, then further undergrounding of this stretch should be considered of both the 400kV (as suggested in our previous consultation response) and of the newly proposed additional 132kV. Relocation of Cable Sealing End Platform and / or alteration of the proposed route could also provide more minimal mitigation.

2.19 Other options for mitigation along this stretch could include keeping the line of new 400kV pylons and the new 132kV line on the same line on higher ground to the east of the A595 beneath the skyline and potentially using lower height pylons. This would reduce the need for frequent crossings of the lines and undergrounding/re-emergence and therefore also reducing the need for Cable Sealing End Platforms.

2.20 In this section, the Council also have concerns about some heritage receptors including potential to have net adverse impacts on Listed Buildings. These need to be given further consideration (see detailed comments in PPA response).
3 Section H1 Lindal in Furness to Morecambe Bay

Standing Tarn to Roosebeck

3.1 From certain viewpoints, this stretch of route, as existing, already has impacts on the drumlin landscape of Furness. This is due to the very regular, linear nature of two parallel lines of pylons marching down the peninsula, creating cumulative impacts and visual clutter, particularly when seen in context of other converging pylon lines and other vertical infrastructure, including multiple wind turbines in groups, farms, singles and both on and off-shore.

3.2 SLDC’s primary concern for this stretch, the route of which moves in and out of SLDC’s authority area (but remains close to and visible from within SLDC’s boundary even when in Barrow Borough), is that opportunities for rationalisation to reduce the number of pylons have not been taken. As a result, instead of the expected net benefit for the area resulting from a net reduction in pylon numbers (replacing one of the 132kV lines with a 400kV line and removing the other 132kV line), a net detriment is proposed as a dual line will remain, one line of which will be the significantly larger 400kV line in addition to a remaining 132kV.

3.3 In addition, a section of the remaining 132kV line is to be realigned, deviating from its current straight route parallel to the other line. This would result in different and/or additional impacts, partly for those properties not previously directly affected, which now will be affected due to the change in route, but also in terms of different landscape and visual impacts resulting from deviation from what was previously regular in form now becoming irregular. The proposed realignment now sees the 132kV line crossing directly over Standing Tarn and sees Longlands Farm (just over the border in Barrow-in-Furness) surrounded by significant electricity distribution infrastructure rather than having it only to the east.

3.4 On this section of the route, it is suggested that opportunities for rationalising this stretch into a single line are looked at again in order to offer a net benefit to the communities of and visitors to the area in terms of reducing impacts on amenity as well as reducing landscape and visual impacts. In particular an option (rejected by National Grid) is supported that would route power via the existing 132KV line from Lindal in Furness to the west of Barrow in Furness and which then requires a new 132KV connection from central Barrow to Roosecote Power Station.

3.5 SLDC welcomes the proposal to underground the route from Roosecote Power Station. However, SLDC does have concerns about the proposed temporary construction compound and tunnel shaft between Rampside and Roosebeck,
adjacent the SLDC boundary. This facility is proposed very close to residential properties, and tourist accommodation and facilities and impacts on amenity must be carefully considered.

3.6 In this section, the Council also have concerns about some heritage receptors. These need to be given further consideration (see detailed comments in PPA response).

4 Natland Substation

4.1 SLDC considers that the proposed extension to the substation at Natland, which includes 4 new 132kV pylons and other significant structures on the western side of Sedgwick Road, will have detrimental impacts on local amenity and the wider landscape. SLDC recommends that alternative siting on the eastern side of Sedgwick Road, adjacent the existing substation should be explored in order to reduce these impacts. Sufficient and appropriate additional screening, similar to that provided for the existing substation should also be planned to help ensure that the impacts of the new structures are mitigated. Impacts during construction must also be carefully considered.

5 Tunnel Island

5.1 Whilst it is not expected that the tunnel island will have significant impacts on the District, the tunnel island will be visible from a number of important viewpoints, including from within the Arnside & Silverdale AONB. SLDC does not consider that sufficient detail has been provided for it to make a fully informed view about the structure and would urge that all possible steps are taken to ensure that it reflects natural features and materials of the Bay area and provides crucial net benefits for wildlife. Design proposals should be made available for comment prior to finalisation.

6 Affected Land in SLDC's ownership

6.1 Some areas of land in SLDC's ownership are affected by the project. This includes a small piece of housing estate amenity land at Burlington Close, Kirkby-in-Furness and Foxfield Business Park, near Broughton-in-Furness.

6.2 In the case of Burlington Close, the area is currently crossed by existing 132kV lines. The same area falls within the proposed Draft Order Limit area and taking into account the proposed alignment and our comments at paragraphs 2.15-2.20 should help to address the associated impacts on this residential area. In any event, the proposed mitigation should ensure that both lines (wires and pylons/poles) are sufficient distance from residential properties so as to provide a net improvement based on the current position.
6.3 In the case of Foxfield Business Park, the site is currently close to but largely unaffected by existing pylon infrastructure. The proposals indicate that a large construction compound with rail access is to be built immediately west of the site and utilising the same access. It is crucial that NWCC provides for continued operation of the Business Park, which includes premises of and access for an agricultural supplies firm and the local Mountain Rescue service.

SLDC wishes this document, along with the detailed response of the wider PPA group to be considered as its formal response to National grid’s NWCC Section 42 consultation.
NORTH WEST COAST CONNECTIONS
CONSULTATION RESPONSE HEADLINES
REPORT

Prepared on behalf of the PPA Group Authorities
## Document control

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<td>North West Coast Connections</td>
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<td>Client:</td>
<td>PPA Group Authorities</td>
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**Date:** 8 November 2016

**Prepared by:** Graham Hale & John Leggett  
**Checked by:** Peter Shannon  
**Approved By:** Lynne Thomas  

**Description of revision:**  
**Style:** Addition of PPA Group comments, changes to format, clarification and typographical points

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**Prepared by:** Peter Shannon  
**Checked by:** Lynne Thomas  
**Approved By:** Lynne Thomas  

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Addition of summary table with key issues (from Core group 161109)

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Revision of Summary table as per Core Group Plus 161115
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1.0 Introduction

1.1.1 The PPA Group welcome National Grid’s commitment to meaningful engagement on project design including technology choices and the significant mitigation that is required. The Group are pleased the informal engagement undertaken thus far has resulted in significant and much needed mitigation.

1.1.2 Based on the available information during the Route Corridors consultation (2014) the PPA Group provided positive feedback and support for the ‘Onshore North’ and ‘Onshore South with Tunnel Option’ including the Morecambe Bay tunnel.

1.1.3 The PPA Group have previously expressed support for the principle of rationalisation of existing overhead lines, therefore, the provision to take down lines is supported so long as the integrity of the electricity distribution network and connection opportunities is not be weakened as a result. Additionally, the Group consider that there are a number of locations where additional lines need to be removed to provide appropriate mitigation.

1.1.4 Furthermore, the principle to develop a new 400kV underground cable through the western section of the Lake District National Park is strongly supported, given the alternatives. However, the implications of undergrounding on other topic areas, such as ecology and historic environment must still be addressed. Furthermore, the decision to remove the existing Electricity North West (ENW) 132kV overhead line (OHL) is also strongly supported, given the benefit this will have on the landscape and views in the area.

1.1.5 The PPA Group welcomes continued engagement with National Grid and considers that adequately addressing the impacts raised in this paper will minimise the risks to the project through the DCO process, protect our communities and increase delivery certainty for National Grid. The Group wants to continue to engage in positive dialogue to enable delivery of the NWCC project in a way that meets both national and local needs, and is consistent with legislation and government policy.
1.2 Document purpose and structure

1.2.1 This report provides a summary of the PPA Group’s emerging consultation response and an outline of the headlines from the evaluation of the North West Coast Connections (NWCC) Preliminary Environmental Impact (PEI) Report issued for consultation by National Grid on 28 October 2016. The PEI Report provides a preliminary environmental assessment of the Project and proposed mitigation measures drawing on currently available information.

1.2.2 This Headlines Report has been drafted in advance of the PPA Group Joint Specialist Response to provide the PPA Group members with an indication of the key emerging issues at an early stage. It is intended that this Report will assist in the development of a joint PPA Group position on issues and help meet challenging committee schedules required for formal Council approval.

1.2.3 The Report has been informed largely by the views of topic specialists from WYG supplemented by comments from the PPA Group Authorities where available. It is based on a broad assessment of the extensive documentation and therefore, is subject to change as specialist assessments are undertaken.

1.2.4 The remainder of this Report is structured as follows:

- Section 2 provides an over view of the key headline issues; and
- Section 3 provides additional detail on the headline issues.
2.0 Key Headline Issues

Landscape and visual impact

<table>
<thead>
<tr>
<th>Summary key points</th>
<th></th>
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<tbody>
<tr>
<td><strong>Baseline</strong></td>
<td>Baseline information is sufficient but further engagement is required as the project moves towards the development of the Environmental Statement and DCO submission to develop a more refined assessment that considers additional visual impacts especially from community user/receptor perspective.</td>
</tr>
<tr>
<td><strong>Methodology</strong></td>
<td>The methodology for identifying areas where mitigation is required and options should be assessed is flawed; adopting ‘particularly significant’ as the bar for mitigation need is not consistent with the EIA Regulations.</td>
</tr>
<tr>
<td></td>
<td>There is a flawed interpretation of national policy and guidance that defines and protects the Lake District National Park and its setting.</td>
</tr>
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<td></td>
<td>There has been a misrepresentation of the visual impact through use of photomontage tools.</td>
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<tr>
<td></td>
<td>The recently updated Cumulative Impact of Vertical Infrastructure tool does not form part of the methodology for the assessment set out in the PEI Report.</td>
</tr>
<tr>
<td></td>
<td>The PPA Group do not agree with that National Grid’s rationalisation policy (one-up-one down) results in a benefit.</td>
</tr>
<tr>
<td><strong>Assessment</strong></td>
<td>Cumulative and sequential impact is not adequately considered in the assessment along whole route. Specifically, the experience of visitors to the Lake District National Park protected landscape have not been adequately evidenced or addressed including the cumulative impacts of viewing this linear project.</td>
</tr>
<tr>
<td></td>
<td>The application of the National Grid’s methodology including the Options Appraisal of Alternative Technologies methodology has resulted in the establishment of inappropriate areas for mitigation of the NWCC project. This has led to a piecemeal approach to mitigation and the consideration of alternative technologies.</td>
</tr>
<tr>
<td><strong>Mitigation</strong></td>
<td>Lack of appropriate mitigation of landscape and visual impacts arising from the use of over head lines; in particular within the landscape setting of the Lake District National Park, and related to cumulative impact to the east of Whitehaven, east of Workington following the existing 132kV line north and in the area of the Hadrian’s Wall World Heritage Site.</td>
</tr>
<tr>
<td></td>
<td>The PPA Group disagree with the assessment and rejection of alternative options for the Duddon Estuary, including a tunnel option, which are based on the flawed assessment of impacts within the landscape setting of the National Park.</td>
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## Visitor economy

### Summary key points

#### Baseline
- The baseline data set out within the PEI Report in relation to socio-economics, recreation and land use is generally derived from the appropriate sources. However, there is an overreliance on evidence from past projects, particularly in relation to the effects on the visitor economy.
- There is a failure to provide adequate information and evidence on the impact on the visitor economy of Cumbria, which is the largest sector in the County’s economy and growing. In particular, there is a lack of evidence to support National Grid’s position that Cumbria’s visitor image/brand will not be significantly damaged.

#### Methodology
- Although the overall approach to the identification and assessment of socio-economic effects is considered to be appropriate, at this stage, there is limited analysis of the Project’s alignment with key local and sub-regional policy, specifically in terms of the visitor economy;
- Importantly, National Grid have failed to acknowledge the unique character of the Lake District National Park.
- The methodology adopted to assess the deterrence effect on visitors draws upon the results of survey evidence from other previous projects which raises several important issues; the transferability to NWCC study area, robustness and validity of this original research is uncertain, and there is substantial methodological criticism of the focus on survey-based approaches to evaluating impacts.

#### Assessment
- Key risks and impacts to visitors’ enjoyment of Cumbria’s landscapes and environment through access and recreation have not been adequately assessed.
- In particular, the issues associated with negative effects on visitor perceptions, as demonstrated by the recent floods, should be recognised. In addition, as previously noted, the PEI Report does not adequately assess the significance of impact at the local level.
- The impact of disruption to public access and to road and rail transport networks has not been properly considered.
- The emerging assessment underestimates the project’s impact on the visitor economy in Cumbria.

#### Mitigation
- There is a lack of appropriate mitigation of visitor economy impacts, including damage to Cumbria’s visitor image/brand.
- There is a lack of appropriate mitigation for disruption to public access and to road and rail transport networks.
- It is considered that appropriate mitigation, such as support for support small and medium sized businesses in the visitor economy and marketing and promotional activities are required to counter the disruption caused during the construction period and the negative perception driven by the adverse impact.
Tunnel head impacts at Barrow and Heysham

### Summary key points

#### Baseline
- There is inadequate information provided on the storage, movement and final destination of tunnel spoil.
- No clear information on the need, purpose or use of the temporary works at the tunnel-heads.
- Noise, vibration, air quality, light, ecology and residential amenity impacts of development at the tunnel-head sites are not adequately stated.
- Transport assessments have not been carried out.

#### Methodology
- The PPA Group disagree with the determination of high sensitivity receptors assessment.
- Standard noise criteria for assessment is inadequate for project of this scale and location.

#### Assessment
- As the baseline data is largely absent the impacts have not been adequately measured and assessed.
- National Grid have drawn conclusions on accommodation availability. However, there is a lack of clarity regarding the required collaboration with accommodation providers to overcome existing shortfalls and/or raise standards of suitable worker accommodation.

#### Mitigation
- No meaningful mitigation is proposed to treat the noise, vibration, air quality, light, ecology or residential amenity impacts.
- No mitigation is proposed to address the impacts caused by the storage, movement and final destination of tunnel spoil.
- There is incomplete workforce planning and accommodation proposals at the tunnel-heads.

### Transport and connectivity

#### Summary key points

#### Baseline
- The PPA group are significantly concerned that the baseline is insufficient to allow selection of road or multimodal strategy.
- There is a lack of appropriate modelling of traffic flows to allow assessment and conclusions to be drawn.

#### Methodology
- A method has not been proposed to enable the selection of the road or multimodal strategy.

#### Assessment
- The key risks and impacts of traffic movements have not yet been addressed.
The PPA group strongly disagree with National Grid’s assessment that railway capacity issues should be a reason for not selecting the multi-modal option. The approach should be to mitigate the rail capacity issues, which would keep traffic off the highway and also provide a legacy benefit.

Furthermore, the PPA Group disagree with the assessment of impacts relating to the ‘road based’ and ‘multi-modal’ options. The multi-modal option will reduce the scale of HGV movements in some areas, which could have safety and environmental benefits.

Fundamentally, the cumulative impacts have not yet been assessed.

Key risks and impacts on PRoW and cycle paths have not been adequately addressed.

Mitigation
- There is a lack of appropriate mitigation measures and improvements to address the traffic impacts on the highway network. These measures need to be informed by modelling of traffic flows both for the individual development and for the cumulative impact, and is dependent upon the completion of survey data.
- Mitigation should also address the following, for which no detail has yet been provided; the safe management of traffic on minor roads; the impact of worker accommodation locations – for example for the underground section within the National Park, and the implementation of Travel Plans.
- The PPA Group are concerned that the PRoW Management Plan has yet to be developed. Additionally, the economic impacts upon the visitor economy need to be assessed.
- Measures should seek to provide a high standard of mitigation to address direct and indirect effects.

Skills and supply chain

Summary key points

Baseline
- The baseline data set out within the PEI Report in relation to skills and supply chain is derived from the appropriate sources, however, there is little detail available to assess the implications.

Methodology
- The methodology is as considered to be appropriate at this stage, and is consistent with that used for other major projects.

Assessment
- The PEI Report recognises that there are no published standards that define the sensitivity and magnitude of socio-economic effects. However, the overall conclusions are considered to be reasonable and consistent with that used for other major projects.

Mitigation
- Initial work towards an Employment and Skills Framework is welcomed, however, it is disappointing that the content of the consultation proposals on what measures will be put in place to achieve the targets and objectives is at this stage inadequate to provide support for the proposals.
The PPA Group support the commitment to secure 20% as a minimum of the workforce from the local labour market – however, National Grid must provide commitment to providing support to target those that are currently economically inactive to help ensure they can secure work.

It is in the interests of National Grid and the local economy for the skills to be locally available and for the businesses to be equipped to become part of the supply chain. There will be a need for a financial commitment from National Grid to invest in local skills development and supply chain capability development.

There will need to be appropriate training facilities provided not only to support the existing population but also to help attract new workers and their families to come and work in Cumbria.

**Ecology**

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<tbody>
<tr>
<td><strong>Baseline</strong></td>
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<tr>
<td>- The baseline fails to provide adequate information and evidence to enable assessment of risks and impacts on key habitats and protected species.</td>
</tr>
<tr>
<td>- There is an inadequate approach and failure to progress with the statutory Habitats Regulation Assessment (HRA) of the impacts of the project on internationally important wildlife.</td>
</tr>
<tr>
<td><strong>Methodology</strong></td>
</tr>
<tr>
<td>- The potential risk to biodiversity from the spread of invasive species from the construction of the project has been inadequately addressed in the methodology.</td>
</tr>
<tr>
<td><strong>Assessment</strong></td>
</tr>
<tr>
<td>- The assessment of impacts on habitats and species have been made in the absence of completed surveys.</td>
</tr>
<tr>
<td><strong>Mitigation</strong></td>
</tr>
<tr>
<td>- Lack of appropriate mitigation and compensation for impacts on habitats and species The PPA Group would expect these to be measures such as avoiding key hotspots, inadequate construction methods and lack of information regarding compensation for loss and disturbance.</td>
</tr>
<tr>
<td>- Significant risk of wildlife impacts from the spread of invasive species is not adequately assessed and mitigated; this is a major risk from such a large-scale linear project.</td>
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**Historic environment and cultural landscapes**

<table>
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<th>Summary key points</th>
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<tbody>
<tr>
<td><strong>Baseline</strong></td>
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<tr>
<td>- Inadequate evidence of impacts to the historic environment and archeology; in particular from underground construction methods including cabling in the LDNP and Roman Empire (Hadrian’s Wall) World Heritage site.</td>
</tr>
</tbody>
</table>
| - The baseline focuses on providing information and evidence relating to
archaeology, and is inadequate for listed buildings and Conservation Areas.

**Methodology**
- Key risks and impacts to World Heritage Sites are not adequately addressed. In particular, only one of the three key features of the English Lake District nominated World Heritage Site have been considered.
- There is no evaluation of the setting of other elements of the historic environment for example listed buildings and Conservation Areas.

**Assessment**
- Inadequate assessment of impacts to the historic environment and archeology. This includes; historic buildings and underground construction methods including cabling.
- The PPA Group disagree with the conclusions of the assessment that there would be “a slight beneficial” significance of effect Roman Empire (Hadrian’s Wall) World Heritage site and the candidate English Lake District.

**Mitigation**
- Without an appropriate evidence base and assessment the PPA Group are unable to provide comment on mitigation measures.
3.0 Emerging Headlines

3.1 Landscape and visual impact

Mitigation Methodology

3.1.1 Fundamentally, National Grid’s approach to landscape mitigation, including the Options Appraisal of Alternative Technologies methodology (OAAT) remains flawed. The PPA Group concerns appear not to have been addressed; therefore, the application has resulted in the establishment of inappropriate areas for mitigation of the NWCC project. This has led to a piecemeal approach to mitigation and the consideration of alternative technologies.

Undergrounding in the National Park

3.1.2 The principle to provide 23.4km (14.5 miles) of new 400kV underground cable through the western section of the Lake District National Park (LDNP) is welcomed. The decision to remove the existing Electricity North West 132kV overhead line is also welcomed, given the benefit this will have on the landscape.

3.1.3 However, the implications of undergrounding on other topic areas, such as ecology and historic environment must be addressed. Additionally, there is a need to consider the appropriate location for the Compound Sealing End (CSE) required as an interface between OHL and the section of underground cabling. The long-term reversible effects of the vegetation loss and disruption to landscape pattern and features due to the implementation of the undergrounding do not appear to have been fully considered. The undergrounding is a major engineering development, and needs to be addressed in far greater detail than is currently in order to understand the potential scale of the temporary disruption to the landscape.

Impacts of the Special Qualities and Setting of the National Park

3.1.4 The proposals for use of pylons and associated cabling within the setting of the Lake District National Park are a major concern. The LDNPA and the PPA Group has very clearly and over a long period of time raised strong concerns about impacts affecting landscape character and views in to and out of the National Park. The PPA Group disagree with the assessment of impacts on the landscape setting of the Lake District National Park; particularly the flawed assessment of national policy and guidance that defines and protects the setting. The Group are concerned that this has led to an inappropriate proposal and the a lack of the required mitigation.
3.1.5 The PEI makes little reference to the ‘setting’ of the LDNP. The PPA Group’s position stated within the Stakeholder Feedback Questionnaire issued in September 2016 was clear that consideration of the wider landscape setting of the Lake District National Park is also of equal importance. Therefore, it is considered that the approach to mitigation currently proposed by National Grid is particularly deficient in its assessment of the effects on the ‘setting’ of the Lake District National Park.

3.1.6 Three issues on setting arise –

- Definition of setting in policy - this is a flawed definition that can be strongly challenged. It fails to consider the long established definition of setting for Protected Landscapes of assessing impacts from within AND outside of the designated area;
- Definition of setting for the NWCC project - the application of National Grid’s flawed definition of the setting set out above leads to a flawed assessment in the PEI in section 6A.3. The impact on receptors is framed entirely by those receptors within the National Park only;
- Landscape character types - the failure of the PEI assessment of landscape and visual impacts to recognise the continuity of landscape types and topography across the National Park boundary is a significant flaw that can be challenged.

3.1.7 The route to the north of the LDNP is to be carried on lattice pylons whilst the section through the LDNP is proposed to be undergrounded from the location of the CSE compound located to the north of Drigg. The baseline description of the area provides a description of the existing landscape and visual context; however, the presence of the Low Level Waste Repository at Drigg is a large repository site within the Subsection and is not referenced. The presence of this site is of particular importance in the consideration of the setting of the LDNP and the proposed 400kV route.
3.1.8 It is noted that there is a short length of undergrounding extending south of the LDNP boundary to a CSE at Silecroft, which is welcomed. However, following a preliminary review of the part of the Subsection that runs from the head of Duddon Estuary over the mosses to Kirkby-in-Furness, we would question why this section of the route is above ground when it forms the setting of the LDNP. Although, the alignment of the route is outside the boundary line of the LDNP designation, the area of land is of similar/equal value and susceptibility as the LDNP in landscape terms in providing the setting to the LDNP. It is therefore considered that this section should be considered for undergrounding. This option would avoid the considerable problems raised by the proposed route across Foxfield Ridge and the Duddon Mosses SAC, as well as in the setting of the LDNP that have been identified in the Duddon Estuary. Whilst we acknowledge that designing a route crossing the Duddon Estuary is challenging, it is vital that the appropriate design and mitigation is provided.

3.1.9 National Policy EN-1, DCLG guidance, the Electricity Act 1995 as well as current planning practice make it clear that the ‘setting’ of National Parks should be considered in the same way as those areas within the National Park. However, the approach to mitigation currently proposed by National Grid is particularly deficient in its assessment of the effects on the ‘setting’ of the Lake District National Park. Consideration of the wider landscape setting of the Lake District National Park is also of equal importance along the whole route of the NWCC Project. Landscape planning guidance from DCLG, including that shown on its website, provides clarity that development by ‘relevant authorities’ impacting on the setting of National Parks should be considered in the same way as those within the National Park. There is a long-established recognition that the legislative and policy framework, including current planning guidance, provides protection of the setting of National Parks. Although these areas are not designated as National Park, developments within the setting can impact upon their statutory purposes and Special Qualities.

The Duddon Tunnel

3.1.10 The PPA Group had also recommended undergrounding beneath the Duddon Estuary to avoid major adverse impacts, particularly at the Foxfield Ridge and the Duddon Mosses SAC, plus the wider landscape setting of the LDNP (see points above about setting of the LDNP). This would also avoid significant visual, landscape and community impacts of the proposals in the vicinity of Kirkby in Furness and Beckside and further south.
3.1.11 However, this recommendation has not been taken forward as part of the consultation proposals. The PPA Group disagree with the assessment and the rejection of alternative options for the Duddon Estuary, including a tunnel option, which are based on the flawed assessment of impacts within the landscape setting of the National Park.

**Cumulative Impact**

3.1.12 The cumulative impact of the vertical infrastructure, particularly in Allerdale, and Carlisle and north Copeland, ‘and in parts of the Furness peninsula is already a concern and larger pylons will further worsen the position. Rationalisation of the Electricity North West (ENW) line has afforded some reduction in OHL clutter in a number of locations in the North Section and notably in the LDNP; however, this does not go provide sufficient mitigation (see below). The PPA Group do not consider that the PEI provides sufficient details to understand the cumulative impact of the project and further assessment is required to assess the impact of the new OHL cumulatively with the existing lines.

**Electricity North West Rationalisation**

3.1.13 National Grid has adopted a one-up-one-down principle in relation to the ENW 132kV OHL, with a number of other areas where additional lines are removed or transferred underground. These are largely focused on the North Section of the route, with additional rationalisation; in the area around the Hadrian’s Wall World Heritage Site (WHS), a section at Broughton Moor and in the area north of Westlakes Science Park. However, The PPA Group do not consider that the appropriate level of mitigation of landscape and visual impacts arising from the use of pylon and overhead cables has been proposed. In particular, to the north of the Moorside site, east of Whitehaven, east of Workington following the existing 132kV line north, and Hadrian’s Wall World Heritage Sites.

3.1.14 Although the additional rationalisation is largely welcomed where the 132kV cable is undergrounded there are concerns regarding the appropriate positioning of Cable Sealing End Platform Pylons (CSEPP), particularly where these are close to the highway or existing properties. This infrastructure is also required where 132kV and below OHL is placed underground to facilitate the cross of the new 400kV OHL.
Electricity North West 132kV Trident over head line

3.1.15 A new 132kV trident route on timber poles extends from Millom and converges with the proposed 400kV route near The Green, extending north beyond the 400kV route round the head of the Duddon Estuary. This line has just been revealed and is required to provide a 132kV connection to the Millom area and specifically the Haverigg wind farm extension. The line connects to a 132kV substation (not proposed within NWCC) and is considered to provide an ungraded local electricity distribution network, as well as connection opportunities in the areas of Millom.

3.1.16 The principle of upgrading the network in the Millom area is welcomed, however, it is considered that this route, albeit on timber poles, will result in a notable increase in visual clutter within the bottom of the valley. There is also concern about the additional visual clutter from the 132KV trident line and associated sealing end pylons around the wider Duddon estuary including at Foxfield, Kirkby in Furness and south to Lindal in Furness.

Methodology

3.1.17 The PPA group are very concerned by the lack of wireframe diagrams to support the photomontages. These make assessment of the impacts, particularly on skylining of the pylons and other infrastructure, difficult to assess. These have been requested by the PPA Group over a long period. While National Grid has very recently agreed to provide some basic wireframes for some viewpoints, this does not fully address the lack of vital information as a key tool for Landscape and Visual Impact Assessment.

3.1.18 The selection of viewpoints for photomontages included in the PEI fails to address some of the concerns posed by the proposals. For example, the PEI viewpoints within the Whicham Valley fail to help assessment of the impact to receptors at lower elevation and from the coastal plain around Silcroft. These locations are within the setting of the National Park, and the PPA Group has been clear that this is a sensitive location. It is a flaw in the PEI to fail to adequately cover them in the viewpoint and photomontage assessments.

3.2 Socio-economics, recreation and land use

Visitor Economy
3.2.1 The NWCC project alone and in combination with other major projects has the potential to disrupt tourist trade through displacement and negative image. The PPA Group is concerned that National Grid underestimates the impact on the visitor economy across the area, by relying on limited local survey and other national tourism studies. Limited primary information regarding the visitor economy has been provided in the PEI, with full assessment of the impact on the visitor sector and visitor perceptions not available until the ES. The PPA Group consider that National Grid have failed to provide adequate information and the level of assessment required to understand the key risks and impacts on the visitor economy.

3.2.2 The impact of the project on Public Rights of Way (PRoWs), paths and cycleway could have significant implication for the visitor economy. This issue is set out below under paragraph 3.4.11 and 3.4.11.

3.2.3 The PPA Group consider that there is a lack of appropriate mitigation of visitor economy impacts, including damage to Cumbria’s visitor image, and the disruption to public access, road and rail transport networks. Appropriate mitigation, such as support for small businesses and marketing and promotional activities are required to counter the disruption caused during the construction period and the negative perception driven by the adverse impact of NWCC. In addition to specific mitigation measures for key tourism and visitor economy assets affected.

Skills and Supply Chain

3.2.4 The PPA Group consider that there is inadequate detail in the PEI to understand the impacts and assess the extent to which these are addressed. Initial work on an Outline Employment and Skills Framework (ESF) is encouraging, however, it is disappointing that measures, targets and objectives are not available is at this stage to support the proposals.

3.2.5 Review of the PEI reveals that National Grid is proposing that 20% of the project workforce and supply chain would be derived from the local area, however, detailed analysis of the PEI material must be undertaken to understand the justification and appropriateness of this figure. While the commitment to secure 20% as a minimum is welcomed, further investigation is required to understand how this level of involvement on NWCC will be secured; the Hinkley Point C Connections project secured a similar undertaking by a S.106 Agreement.
3.2.6 Furthermore, the PPA Group consider that it is in the interests of National Grid and the local economy for the skills to be locally available and for the businesses to be equipped to become part of the supply chain. However, this needs commitment from National Grid to invest in local skills development and supply chain capability development. Additionally, as part of the package of measures National Grid and their contractors should commit to target economically inactive people in the area and the recruitment of apprentices to support local skills training and development. These measures will help mitigate displacement impacts, however, they will require a funded programme of intervention and support and a commitment from Grid (and their contractors) to recruit from the pool of people that are supported.

3.2.7 The PPA Group are concerned that there is very limited detail on mitigation measures that will be required to address the impacts of the NWCC Project, and therefore, few details of how the mitigation will be secured and monitored. It is important that National Grid;

- makes clear and early commitments to providing funding to support the development of local business capability and capacity, working with the LEP and other local partners, through the development and implementation of a supply chain strategy.
- progresses the development of a detailed skills action plan to ensure that there is investment in skills development in advance of construction in order to facilitate employment and training of local people.
- makes early commitments to capital investment in training facilities.
- provides a clear procurement strategy and to develop specific interventions with measurable and enforceable targets that capture the local benefit for Cumbrian businesses.

3.2.8 Additionally, the PEI suggests that the need for investment in education and training facilities will be explored further, and if there is a need, any proposed support and investment measures will be reported in the Employment and Skill Framework and submitted with the DCO. The PPA group consider that such investment is required for appropriate training facilities provided not only to support the existing population but also to help attract new workers and their families to come and work in Cumbria. However, an understanding of the delivery mechanism is required to evaluate the appropriateness of this undertaking. It is also suggested that
Employment sites and land allocations

3.2.9 The PPA Group previously suggested a number of sites that should be considered for investment and use within the NWCC Project. A number of these have been proposed for use as construction, rail and helicopter compounds, notably sites at; Port of Workington and Kingmoor Park Lillyhall, Wigton, Aspatria, Flimby, and Heysham. There are also potential effects on land allocations at Barrow Port and Marina, as well as employment and current planning applications proposed for Roosecote Power Station, and land at Heysham, Heysham Port and Heysham Moss. The PEI considers that the likely effects of the NWCC Project would not be significant during both the construction and operational phases. Permanent land take effects would occur in relation to the proposed Tunnel Head and substation areas at Roosecote and Middleton. As both of these areas of ground are currently vacant at present, the PEI states that their use is expected to lead to longer-term beneficial effects. Similarly, their use is considered in the PEI to be consistent with policy objectives as set out in the respective Development Plans.

3.2.10 The assessment for the North Route identifies a number of planning site allocations in Local Plans, where there could potentially be conflicts during the construction phase. These include: the Ehen/Keekle Valleys Tourism Opportunity Site and the Whitehaven Eastern Relief Road; a possible Opportunity Site at Hensingham Common comprising 16ha of employment land of which 1.8ha would be used as a site compound; Whitehaven Commercial Park, Lillyhall Industrial Estate and Derwent Forest Site; Kingmoor Park Industrial Estate, Kingmoor Park Rockcliffe, Kingmoor Park Heathlands Estate, and land at Station Road Wigton. In terms of the operational phase, only the Ehen/Keekle Valleys Tourism site would seem to have any long-term effects, as all the others would be used for temporary site compounds.

3.2.11 In terms of the South Route, further investigation is required to assess the impacts on allocations described above especially in Barrow and Heysham. In addition the above new permanent lattice trident terminal pylons (with laydown), are shown to be located within the site boundary of a housing site next to Burlington School in Kirkby-in-Furness, which is allocated in the SLDC Land Allocations DPD. This will cut across the allocated site and could have a negative effect on the allocation.

3.2.12 Further investigation will be undertaken within the detailed response to understand the detail of National Grid’s proposals to ensure the impacts are considered and where possible legacy secured.
Ability to connect to the ENW network

3.2.13 The PPA Group has previously provided comment regarding maintaining the integrity of the ENW infrastructure in a number of areas across the route, while also ensuring the opportunity for new connections for both users and producers. National Grid’s proposed route makes provision for a number of additional 400kV substations, the extension to a number of 132kV substation and substantial re-configuration of the ENW infrastructure. Initial review of the PEI suggests that reconfiguration of the infrastructure could be better designed to meet future needs of users and producer, for example ensuring connection opportunities at the Stainburn substation. Additionally, previously expressed concern regarding the resilience of the ENW infrastructure to flooding does not appear to be addressed, indeed the Carlisle 33kV substation is not included in the project.

3.2.14 Furthermore, initial review of the PEI suggests that the integrity of the ENW network in the Millom area appears to have been addressed by the addition of a 132kV trident line that connects from a 132kV substation (not part of this project) near Millom, round the Duddon Estuary to the network at Lindal. However, it is understood that the new substation is contingent on the development of the Haverigg Wind Farm. The impact of the trident line is considered above.

3.3 Tunnel head impacts at Barrow and Heysham

Lack of details

3.3.1 Significant issues have been raised regarding the impact of the tunnel construction on the local community, transportation links and social infrastructure in Roosecote and Heysham. Initial review of the PEI suggests that there is limited information regarding the tunnel heads and the impact on the surrounding community. For example, information on the construction processes (such as the slurry treatment plant) will not be available until the ES. Proposed construction working hours are included in the Code of Construction Practice that accompanies the PEI Report. In the absence of vital information, the PPA Group considers that the impacts related to noise, vibration, air quality, light, ecology and residential amenity at the tunnel-head sites are not adequately measured, addressed, or mitigated. This issue is a significant concern.
Impact of Tunnel Head construction

3.3.2 Following on from the section above the PPA Group has significant concerns about both proposed layouts given their proximity to existing and proposed residential and commercial development, and adverse impacts on PRoW. Little information is available regarding the onsite processes, such as those relating to the 20m high slurry treatment plant or off site movements. Therefore, at this stage it is not clear whether the local areas will be subject to an unacceptable adverse impact on amenity and health for a prolonged period of construction.

3.3.3 As stated above, National Grid does not intend to provide more information on the project infrastructure, or an assessment of the impacts on the amenity of the local community until the Environmental Statement (ES) to be submitted alongside the DCO.

3.3.4 It should be noted that the indicative layout for the Roosecote tunnel head now reflects the submitted planning application by Centrica for a gas fired power station and energy storage plant. National Grid is confident that there remains sufficient space to accommodate the manufacture of all the concrete segments required for the tunnel. Additionally, after concerns were expressed regarding the location of the segment factory in Heysham, proposals do not include a factory on the Lancashire side.

Worker accommodation

3.3.5 During the construction of the project there is likely to be a concentration of over 380 workers at each of the tunnel heads at Barrow and Heysham. Given the number of directly employed workers required for the construction of the tunnel, and the other major projects in local areas, accommodation for workers is a key concern. The PEI concludes that there is limited effect in the Heysham area given access to transport links and the wider catchment of workers. However, the PPA Group consider that a workforce strategy is nevertheless required that will include commitments from Grid to support delivery of worker accommodation (including refurbishment of existing housing stock) so as to avoid adverse impacts on the existing housing market and visitor accommodation.

3.3.6 The impact in the Barrow area is acknowledged and National Grid commit to working with stakeholders to produce an Accommodation Plan to be submitted with the ES. There are currently no details on the content of the Plan. This accommodation will also cover the area of undergrounding in the LDNP.
3.3.7 The PPA Group is concerned that currently there is incomplete workforce planning and accommodation proposals at the tunnel-heads. The PEI Report does not indicate any collaboration with accommodation providers to overcome existing shortfalls and/or raise standards of suitable worker accommodation.

**Material, waste and tunnel spoil**

3.3.8 The Key Issues Report suggested that the level of construction materials and tunnel spoil generated will place extensive pressure on the transport infrastructure if a road based strategy is followed. Currently National Grid is consulting on both a road based, and multimodal transport strategy (see transport section below). Until a decision has been made it is difficult to appreciate the implications for the materials and waste resulting from the tunnel construction. This is a significant issue that needs addressed before the impacts can be appreciated. National Grid state they are happy to continue to discuss opportunities for the positive use of the tunnel spoil with the PPA Group. However, plans do not appear to have been progressed. A proposed use at Cavendish Dock has been rejected, as the site is part of a SSSI, a SPA and Ramsar, primarily for its bird interest, and National Grid consider that initial investigations suggest there is no reason for its de-notification.

3.3.9 National Grid has proposed a materials movement corridor on the causeway forming the southern edge of Cavendish dock. Movement options being considered include conveyors, narrow gauge rail or use of HGVs with traffic control. This route allows direct access to the Port of Barrow as means of importing and exporting materials and waste. However, some of these options may result in closure to the causeway, including a PRoW for the period of use, in addition to possible noise and amenity issues. The PPA Group suggest that there is inadequate information on the storage, movement and final destination of tunnel spoil.

### 3.4 Transport and connectivity

**Transport Strategy**

3.4.1 National Grid have yet to select the Transport Strategy, however, review of the PEI suggests that the key risks and impacts of traffic movements have not yet been addressed.
3.4.2 The PPA Group are significantly concerned that National Grid are not consulting on a single and coherent transport strategy. This is a major issue that has widespread impact across other topic areas, such as visitor economy and waste and material. Additionally, the PPA Group and affected communities need to understand how the project will be delivered and what the mitigation and transport improvements are. This approach is inadequate and therefore the PPA Group cannot support National Grid’s transport strategy at this point. Given these fundamental issues it is suggested that a subsequent consultation may be required when National Grid have sufficient information and a single strategy to appropriately address these issues.

3.4.3 National Grid conclude that there are no traffic reasons to favour the multi-modal option because of increased flows on more sensitive routes, the road option having a greater impact on the strategic routes which are generally less sensitive. The PPA Group do not accept this conclusion, as it is not clear that this is appropriate and whether it should apply in all cases. For example, the multi modal strategy would reduce the number of traffic movements though Barrow.

3.4.4 Overall, the PPA Group strongly disagree with the assessment of impacts relating to the ‘road based’ and ‘multi-modal’ options. The multi-modal option will reduce the scale of HGV movements in some areas, while also having safety and environmental benefits. Additionally the Group are concerned that the cumulative impacts have not yet been assessed.

3.4.5 The multi-modal options will have a significant reduction in overall vehicle usage, especially for HGVs. This will reduce emissions and accidents, however, these benefits have not been considered.

3.4.6 Furthermore, the PPA Group do not accept National Grid’s assertions that railway capacity issues should be a reason for not selecting the multi-modal option. The approach should be to mitigate the rail capacity issues, which would keep traffic off the highway and also provide a legacy benefit.

3.4.7 For the central strategic route area National Grid suggest an additional reason for not choosing the multi-modal option is given as the impacts on capacity of the Cumbrian Coast Line, Workington Port and Workington Port rail depot, although it is understood that there is sufficient capacity at Workington Port to accommodate the additional tonnage.
Transport improvements

3.4.8 The construction of the NWCC project will require extensive traffic related to the importing (and decommissioning) of material for access and haul roads, construction materials, cabling and waste. There is concern about the cumulative impact of these movements on the transport network especially if a single source is used and a road based approach is adopted. Additionally, a number of rail and road construction sites are proposed to store and deploy materials; these are all along the route and are more concentrated in the areas where underground technology will be used, such as Drigg, Silecroft and Foxfield. The transport infrastructure along the route and in these areas in particular is constrained, therefore, the impact of the movements is likely to require mitigation measures to address pinch points on the network and improve the local highway network, and minimise impact on nearby residents and businesses including at Foxfield Business Park.

3.4.9 Fundamentally, there is a lack of appropriate mitigation of traffic impacts on the highway network, which needs to be informed by modelling of traffic flows both for the individual development and for the cumulative impact, and is dependent upon the completion of survey data. It is suggested that mitigation should also address the following, for which no detail has yet been provided; the safe management of traffic on minor roads, the impact of worker accommodation locations – for example for the underground section within the National Park, implementation of Travel Plans

3.4.10 Lack of information on mitigation is a serious issue that needs to be addressed to enable a full assessment to be made.

Public Rights of Way (PRoW), cycle ways and paths

3.4.11 The NWCC project will have temporary (during construction) and permanent effect on the PRoW across Cumbria and those related to the tunnel head at Heysham. This will include closures, diversions and a reduction in the amenity and ability of users to enjoy the routes.
3.4.12 Review of the PEI reveals that the project will have an adverse impact on a number of PRoW, paths and cycleways. Key risks and impacts on PRoW and cycle paths have not been adequately addressed. More in depth assessment is required to understand the extent of these impacts across the area, however, at this stage National Grid are proposing a package of measures to mitigate the closures and disruption to the routes. These will be set out in a PRoW Management Plan (PMP) that will form part of the application for DCO. In addition, a number of specific mitigation measures are proposed in certain locations, these relate to proposed plans for the mitigation of key features such as a proposed Hadrian’s Wall Mitigation Plan. These specific plans will also be secured in the DCO. The PPA Group are concerned that at this time there is a lack of clarity on appropriate mitigation measures that are required.

3.4.13 While the undergrounding through the Park be supported, in terms of setting, the A5092 transport corridor approach to the Western Lakes, along with the ‘view out’ of the National Park from Open Access and specific PRoW are undeniably affected by the proposed stretch of pylons that hug the National Park Boundary through Whicham and the Duddon.

Construction Access Points

3.4.14 WYG have been provided additional information outside the PEI showing the routes from the main roads, such as the A596, to construction access points. There are a significant number of access points to service the 1000 individual construction sites across the area. Some of the routes are on narrow lanes with tight bends, sharp crests, narrow bridges, NCN cycle routes or past schools, e.g. Beacon Hill School in Aspatria. Access to the Barrow tunnel head is off the A5087 which has residential frontage, on-street parking and a low bridge. No details of how these routes will be safely managed with the additional HGV flows have been provided. This should be part of the public consultation.

Highway Assessment

3.4.15 The impact of construction traffic has been assessed based on the average daily flow in the busiest peak four week period – based on engineering judgement. Whilst the principle that the impact should be reasonably prolonged (not just for a day or two) is accepted it is not clear why four weeks is appropriate.
3.5 Terrestrial and avian ecology

Habitats Regulation Assessment

3.5.1 The PPA Group are significantly concerned that there has been a failure to progress with the statutory Habitats Regulation Assessment (HRA) of the impacts of the project on internationally important wildlife. This has resulted in a failure to identify risks, such as those associated with the Ravenglass Estuary SAC of undergrounding/HDD operation, and of tunnel option on Morecambe Bay SAC/SPA. Furthermore, the PPA Group are concerned that a number of sites or sections which are hydrologically linked to European or International sites have been scoped out (e.g. South Solway Mosses SAC); Additionally, it is considered that the lack of any assessment of cumulative impacts on ecology, including EU protected sites and species, will affect the timescale for the HRA.

3.5.2 This could lead to significant delays to the acceptance of the DCO by PINS if not addressed.

Ecology Surveys

3.5.3 Many of the ecology assessments have been based on incomplete survey data, which will need updating when surveys have been completed. This information will now only be available for incorporation into reports at the ES stage so we will not be able to comment on any of the final ecology evaluations and assessments.

3.5.4 Additionally, some assessments provide a conclusion of no significant effect despite the fact that surveys are still ongoing.

Topics Scoped out

3.5.5 It appears that the existing incomplete information has been used to scope in or out various designated sites, habitats and species. This approach will not provide a robust assessment until all the information has been considered, and scoping out features prior to obtaining all the data may result in these features being ignored prior to the final ES. Provision of habitat areas in table format should be sought for the development order limits sections.

3.5.6 Issues have then been scoped out (habitats and/or species) from certain sections prior to assessing completed survey material. The PPA Group suggest this results in unreliable conclusions on significance of potential impacts.
Non-designated priority habitats

3.5.7 The PPA Group are concerned that non-designated priority habitats are not effectively assessed and therefore are not appropriately protected. This is of particular significance in the southern section where undergrounding is proposed which has potential to result in more significant damage to habitats. Additionally, parts of the assessment rely on Aerial Photo Interpretation and therefore it has not been possible to accurately assess the value of most habitats using this approach.

Invasive Non Native Species

3.5.8 Although invasive species have been recorded as present or absent within entire route sections there is no detail on location of Japanese knotweed where it may provide a constraint to the works. The PPA Group consider that in view of the large geographic extent of the linear project it is vital that non-native invasive species are dealt with extreme care due to the risk of spread over a wide area posing potential significant risks to biodiversity. In particular – Japanese knotweed can take many years to eradicate, therefore it will be important to deal with this problem well in advance of the proposed construction schedule.

Effective Mitigation

3.5.9 The PPA Group are concerned that the mitigation measures outlined are not considered adequate. There is a lack of appropriate mitigation and compensation for impacts on habitats and species; in particular not avoiding key hotspots, inadequate construction methods and compensation for loss and disturbance.

3.5.10 Design mitigation will be important to avoid impacts on several County Wildlife Sites and woodland areas. For example, the present route results in woodland areas, including parts of ancient woodland, being lost or the canopy removed. Compensation is proposed by National Grid to comprise planting of a similar area of woodland to that lost. However, loss of mature woodland and in particular ancient woodland cannot be mitigated or compensated for. The first consideration should be the avoidance of woodland through micro-siting but the information provided does not make it clear in most cases whether micro-siting has been considered and why this cannot be achieved.
3.5.11 The PPA Group consider that in all cases avoidance should be adopted, and if this is impossible then the reasons for this need to be highlighted and explained in detail. Additional compensation will be expected where loss of mature/ancient woodland is still being considered. It is also considered that a clear Code of Practice for any development work in the vicinity of ancient or mature woodland.

**Protected Species Impacts**

3.5.12 Clear rationale behind the selection of specific study areas for additional protected species survey and more detailed habitat/NVC survey is not provided other than an overview of methodology used. It is not always apparent how disturbance to protected species will be assessed and addressed during construction and maintenance phases.

### 3.6 Historic environment and cultural landscapes

#### World Heritage Sites

3.6.1 The PPA Group are concerned that the key risks and impacts to World Heritage Sites are not adequately addressed. In particular, only one of the three key features of the English Lake District nominated World Heritage Site have been considered. Although the assessment terminology used in the PEI is the same as in the ICOMOS HIA Guidance (2011), it exclusively focuses on the physical historic environment as an attribute of Outstanding Universal Value (OUV). There is a tendency within the suite of PEI documents to treat World Heritage as solely a historic environment issue. However, this approach covers only part of the first of the three themes of OUV which have been identified for the English Lake District. There is a need to ensure that the HIA takes into account the full range of OUV attributes from the three main themes. There is also a need to make sure that the wider EIA also takes into account the full range of National Park Special Qualities. Currently it is not clear that the PEI has done this.

3.6.2 Furthermore, the PPA Group consider that there is a failure to provide adequate information and evidence to enable assessment of impacts on the Frontiers of the Roman Empire (Hadrian’s Wall) World Heritage site (FRE WHS).
3.6.3 The PEI concludes that for both the FRE WHS and the candidate English Lake District WHS, the net effect of NWCC would be "a slight beneficial significance of effect on this asset as a whole". This appears to be based primarily on the removal of ENW infrastructure and improvement of the ability to appreciate the physical historic landscape. In terms of the Lake District National Park, this relates only to part of the first theme of Outstanding Universal Value (OUV).

3.6.4 The HIA should also assess the potential impact on OUV of the surface treatment of the undergrounded section within the National Park.

3.6.5 Without a demonstrably comprehensive HIA it is it is difficult at this stage to accept the conclusion that NWCC would have "slight beneficial significance“ for the OUV of the candidate English Lake District WHS.

Historic Environment and Archaeology

3.6.6 The PPA Group consider that there is inadequate evidence and assessment of impacts to the historic environment and archaeology across the route, and in particular from underground construction methods including cabling in the Lake District National Park. Undergrounding will have a major impact on any archaeological remains within the corridor and although mitigation can be provided, in terms of evaluation and recording, there is a risk that any archaeological remains could be destroyed on the route and they are a finite and unrenewable resource.

3.6.7 A major concern is, however, that the desk based assessment and walkover survey of the route corridor has not, as far as we are aware, been complete; and no viewpoint analysis is provided in connection with potential impacts on the setting of designated heritage assets. It is understood that the results from this piece of work and other projects that have been recently completed (i.e. aerial mapping project/Romans in Ravenglass), have not been used in the PEI. We therefore do not feel at this stage that we have all the information available to be able to ascertain the overall impact on the historic environment.

3.7 Project wide comments

Cumulative impact assessment
3.7.1 As stated in the PPA Group comments on the PEI Cumulative Effects Briefing Paper, the adopted four-stage approach which reflects the approach within the PINS Advice Note 17 is welcomed. It is understood that the PEI will only contain stages 1 and 2 as set out in the advice note, and that the EIA procedure will enable decision making as to the actual final cumulative impacts to be assessed, their extent and residual outcomes.

3.7.2 As this is such a critical element for decision makers, whilst paragraph 22.1.6 states that “Consultee comments have been considered during the compilation of this chapter, with the ZoI and assessment methodology amended where appropriate”, it would be more helpful and clearer to the Planning Inspectorate in the future for a table be provided in the ES setting out whether or not the changes sought by the PPA Group have been accepted, and if they have not then there should be clear justification for doing so.

3.7.3 There are a number of specific areas that require clarification, which relate to the assumptions for the distances used for the Zones of Influence identified for each of the topic areas covering: landscape (10km), Socio economics (20km), terrestrial and avian ecology (20km), historic environment (10km), and waste (10km).

3.7.4 With regard to marine matters, we note and welcome that Table 22.1 now confirms that the Islet associated with the Morecombe Bay tunnel, consultation with relevant bodies and Government levels and that works in the Duddon and Ravenglass estuaries are to be included.

PEI consultation

3.7.5 In a letter dated 21 October 2016, the PPA Group had expressed concern to National Grid that despite a 10-week consultation period running from 28 October 2016 to 6 January 2016, this was a compromise position and had been based on assurances by National Grid that technical information would be released to the Authorities well in advance of the formal consultation date. This length of time was needed to allow all the PEI material to be properly considered and for that consideration to inform the Local Authorities’ consultation response.
3.7.6 However, notwithstanding that assurance, several deadlines offered by National Grid were passed without the technical information being released on time. Consultation responses have to be approved by the various Local Authority Executives prior to issue to National Grid, and there is a significant lead-in time for all Committee reports to be prepared by the Local Authorities. The delay by National Grid in presenting material in the PEI has therefore meant that a full consideration of all the documentation is a significant challenge within the timescales. As a consequence the original request that the S.42 consultation be extended to the 3 February 2017 still stands to enable the PPA group to provide National Grid with a properly considered and approved consultation response, and enable National Grid to have full information on local sensitivities and impacts when it finalises the application ready for the DCO submission.

Lack of information

3.7.7 There has been a general lack of sufficient information presented within the PEI for a full assessment of the potential effects of the development to be carried out by the PPA Group and its specialists at this formal stage of consultation.

3.7.8 There are gaps as well as assumptions that have been made across almost all topic areas (including landscape, ecology, transport, historic environment, socio-economics, noise, hydrology etc). If this is carried through to the final Environmental Statement could lead to incorrect assessments and the wrong conclusions drawn on the likely affects. Additionally, the approach would be inadequate in terms of ongoing engagement with the PPA Group and other organisations. This is addressed in more detail in the topic-by-topic analysis and will be drawn out in the final PEI response.

3.7.9 The PPA Group are concerned that these matters need to be addressed and consulted on prior to the development of a Environmental Statement and the submission of the DCO.
Response of SLDC to the 2014 National Grid North West Coast Connections Route Corridor Consultation

1. General comments
1.1 SLDC broadly supports the preferred option – Onshore South with Tunnel.

1.2 The preferred option includes a tunnel under Morecambe Bay from close to Heysham to the Rampside area and then broadly follows the existing 132kV Electricity North West power line northwards through the Furness peninsula to Broughton in Furness and then up the West Coast of Cumbria, much of which will be removed and replaced by a smaller number of larger 400kV pylons.

1.3 The preferred option, in the main, avoids the significant impacts to South Lakeland communities that would be incurred if other alternative options, such as Onshore South, were implemented.

1.4 However, SLDC’s support for the preferred option is subject to consideration of the remaining concerns and needs for mitigation detailed below.

2. Section H1 (South eastern Furness)
2.1 The preferred tunnel route is proposed to surface slightly inland in the area between Roosebeck and Rampside. SLDC considers that locating the convertor stations at the points where the cable surfaces as close to the existing energy infrastructure at Roosecote Power Station as possible (as indicated by the larger blue hatched polygon in the consultation material) would indeed be preferable. It would have the least impact on social, environmental and economic factors, including landscape, impacts on local communities and tourism. This area would also be beneficial in terms of opportunities for using the railway and Barrow Port as a means of removing extracted material resulting from creating the tunnel.

2.2 The alternative locations for the tunnel head convertor station on the east coast of Furness (even those that lie within the green preferred option route corridor ribbon but outside of the larger blue ‘area of search’ polygon) would have significant impacts on the local area, especially those that lie further up the east coast of Furness at Newbiggin and Aldingham. These would include impacts on the landscape and on the small coastal communities in the area, potential impacts on the attractiveness of the Coast Road as a destination for locals and visitors enjoying a day by the sea and impacts on a number of Listed structures in and around Aldingham, including St Cuthbert’s Church (Grade II*).
2.3 If the potential but non-preferred convertor station locations close to Newbiggin and Aldingham were chosen, the routes required to then take the cables inland to join the existing route/preferred option route could also have significant impacts on settlements such as Dendron, Gleaston and Scales. The landscape in this area is not currently impacted by energy infrastructure or other significant vertical structures. Stainton, which lies just east of the existing 132kV route, could potentially find itself with such infrastructure on both its eastern and western edge. The area also contains several listed buildings such as Gleaston watermill (Grade II) and castle (Grade I) and Stainton Hall (Grade II). Furthermore, the construction work associated with the non-preferred tunnel head locations close to Newbiggin and Aldingham could have significant traffic impacts on the Coast Road. For these reasons, these potential, non-preferred options could not be supported by SLDC.

2.4 Care should be taken when introducing the larger pylons into the drumlin and limestone landscapes of south eastern Furness and therefore, irrespective of the route taken through this area, consideration of the use of lower height lattice or T pylons might be beneficial on some stretches and opportunities for rationalisation to reduce the number of pylons should be considered, for example, from west of Leece north to the sub-station west of Lindal in Furness. In addition, a Limestone Pavement Order north east of Stainton would be affected by option H1.3.

3 Section E2 (Kirkby in Furness, Broughton in Furness and the Duddon Mosses and Estuary)

3.1 At Kirkby in Furness, the preferred route passes along the boundary of one of the sites allocated for residential development in the South Lakeland Local Plan – Land Allocations (Land adjacent to Burlington C of E School). An existing pylon also lies on the boundary of the site. The introduction of 400kV pylons at this location could have a significant impact on the future development of the site and on current and future residents as well as impacting on Kirkby in Furness and Beckside more widely. Mitigation measures, such as undergrounding, careful pylon siting and spacing and/or alternative routing, are imperative here and would reduce the impacts to below current levels for current and potential residents in this part of Kirkby. Re-routing and pylon siting would need to take into account impacts on Grade I Listed Kirkby Hall, Burlington Quarry operations and the need to keep the pylons beneath the horizon created by Kirkby Moor when viewed from the west. More general landscape and community impacts would also need to be taken into account, including impacts on the community facilities and new MUGA at Beckside, which are immediately adjacent an existing pylon.
3.2 The existing route from Wall End (northern end of Kirkby in Furness) to Hallthwaites should be considered for undergrounding, due to the potential here for minimising landscape impacts close to the Lake District National Park. If undergrounding is not possible, the existing route should be followed as closely as possible and smaller (lower height lattice or T pylons) should be considered to cross the mosses and estuary in particular. Keeping to the existing route would avoid introducing new impact on areas that are currently free of pylons and which are closest to the Lake District National Park boundary in this stretch. It would also minimise the landscape impacts that would result from new, taller, wider pylons. On landscape grounds, SLDC would not support the potential variations to the existing route around Broughton in Furness indicated by the wide green preferred route corridor and the loop towards Wreaks Causeway identified in the consultation material.

3.3 In and around the internationally protected habitats (Duddon Mosses) through which the existing route runs, the 400kV lattice towers may be preferable in terms of SPA birds due to the higher visibility and greater height of the cables. In addition these towers are situated approximately 360m apart compared to the 132kV pylons which are around 200m apart. However, by replacing the 132kV with 400kV or by undergrounding, areas of habitat may be disturbed. Use of T-pylons may also require permanent access tracks for maintenance and may raise concerns from the ecological point of view.

3.4 In short, E2.1 (existing route) and E2.2 (Wreaks Causeway loop) are broadly similar in impact except in their landscape and ecological impacts. E2.1 is preferable in landscape terms and E2.2 is preferable in ecological teams. It is noted that National Grid’s assessment concludes that it is not currently possible, based on information gathered to date, to identify whether E2.1 or E2.2 is the preferred option at this stage given the balance between ecological and landscape factors at play in either option.

3.5 However, the impacts of E2.2 on other factors are also considered important. For example, the impact on Broughton in Furness and Grizebeck that would result from bringing the route closer to these settlements and impacts relating to bringing the route into an area currently free from this type of infrastructure. A site recently allocated for employment in the South Lakeland Local Plan – Land Allocations falls within the route corridor of this option (Land west of Foxfield Road, Broughton). Additionally, there are heritage considerations including potential impacts on views out from Broughton’s Conservation Area and potential to adversely affect Listed Buildings (e.g. Sand Gap). As such it is considered that the adverse effects of this route would potentially outweigh those of E2.1.
3.6 In any case however, indirect and direct impacts and benefits of replacing the pylons or undergrounding along this stretch must be carefully considered and mitigated if necessary. The range of ecological considerations relating to the Duddon Mosses SAC and Duddon Estuary SPA/Ramsar and their qualifying features, as well as the high quality landscape within and on the edge of the Lake District National Park and the impacts on communities, must be taken fully into account in coming to a final decision about the most appropriate way to cross the Duddon estuary and the important habitats in and around the estuary.

3.7 Further assessment work (including Habitats Regulations Assessment) and consideration of the longer term impacts and potential for mitigation (including undergrounding and pylon spacing and siting) are crucial in determining which option should be taken forward in this area and SLDC would welcome close involvement in this further work.

4 Discounted options

4.1 Comments made by SLDC at earlier consultation stages set out specific concerns relating to discounted options considered earlier in the process – namely options involving either one or both double circuits taking onshore routes across South Lakeland. These strong concerns would continue to apply if any such options were brought back into consideration.

4.2 In particular, SLDC’s concerns relating to the discounted options included potentially significant impacts of an onshore route through South Lakeland on:

- local communities;
- the Arnside and Silverdale Area of Outstanding Natural Beauty;
- the landscape, including coastal landscapes and areas close to and within the Lake District National Park;
- tourism, ecology, recreation and the economy.

4.3 National Grid has also discounted a wholly offshore route from Heysham to Moorside using a HVDC connection. This was mainly due to technological and maintenance constraints, including conflicts with significant existing infrastructure on the sea bed. SLDC recognises these constraints and also has concerns regarding the lack of opportunity a completely offshore route would offer regarding future connections to the Grid for industry and new energy infrastructure. This option could constrain future development, including economic development opportunities. As such, SLDC supports National Grid’s position that this option should be discounted.
5 Construction Phase

5.1 SLDC wishes to see direct benefits of the construction works and all associated works required as part of the North West Coast Connections Project for local people and businesses. It should be ensured that local people are sought to undertake the works and that they prepared to take up the roles. This will mean relevant training being offered, potentially in conjunction with local colleges, in advance of the construction phase. In addition, local businesses should be utilised when procuring the services, materials and goods required supporting all aspects of the project wherever possible. This should include procuring and accommodating the workforce required and sourcing, delivery and removal of materials. SLDC would welcome close working with National Grid to ensure that the project secures a wide range of benefits for the local population.

5.2 Whilst in transport terms the proposed option of not removing existing infrastructure in certain circumstances appears beneficial as it reduces the need for transport movements, transport movements resulting from removal would be a temporary impact, whereas the remaining defunct infrastructure would be a permanent feature additional to the new infrastructure. This must therefore be considered in the wider context, including the cumulative impacts of vertical infrastructure on local communities and landscape.

5.3 SLDC supports National Grid’s suggestion that alternatives to road transport are sought during construction in order to minimise additional HGV movements on local roads.

6 Community benefits

6.1 SLDC would like to see community benefits delivered as part of the NWCC project. A commitment by National Grid to support local environmental and projects and landscape projects would help to build community support for the proposal. There may be opportunities around the Lancaster Canal restoration project. It is also possible, as the details are worked up, that the engineering works associated with the construction of the line could contribute to resolving local issues along the route. Where such opportunities exist, SLDC will work with National Grid and other delivery partners to ensure that the community benefit is maximised.
# Equality Impact Analysis

## Assessment Proforma

**EIA Title:** EIA for Council’s response to the North West Coast Connections Detailed Route Proposals Consultation

1.0 The public sector equality duty (2011) covers the following eight **protected characteristics**:

*Age, disability, ethnicity, religion or belief, sex, sexual orientation, gender reassignment, pregnancy and maternity.*

The duty also covers marriage and civil partnership, but only relating to the elimination of unlawful discrimination (see below, 2.0).

1.1 SLDC includes “**rurality**” and “**socio-economic disadvantage**” as additional categories in its equality impact assessments. Although socio-economic status and rurality are not recognised protected characteristics under the Equality Act, people on low incomes or in rural isolation are highly likely to be affected by services that are intended to support vulnerable people.

2.0 **The General Equality Duty.**

SLDC, in the exercise of its functions, should:

a. **Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.**

b. **Advance equality of opportunity between people who share a protected characteristic and those who do not.**

c. **Foster good relations between people who share a protected characteristic and those who do not.**
Step 1

Summarise the subject and expected outcomes of this EIA.

Approval to submit Council’s response to the North West Coast Connections (NWCC) Detailed Route Proposals Consultation. It is expected that the approval of this proposal would have neutral impacts relating to equality and diversity.

Who are your main stakeholders and list any engagement undertaken (include surveys, feedback forms, complaints, statistics etc.).

The main stakeholders are the residents and business of South Lakeland, visitors to the area and those with land or other interests in the District. Consultation has taken place on a varied and ongoing basis throughout the evolution of the proposed NWCC route. This included an earlier stage of formal consultation held for 12 weeks by National Grid, which itself employed a range of consultation methods, including sending a newsletter to every household within 1km of the route corridors (amounting to 135,000 newsletters, including those outside of South Lakeland) and a series of 33 public drop-in events (including those outside of South Lakeland) as well as using the web, letters and emails to residents, businesses and others with interests in the project, newspaper adverts/notices, documents available to view at libraries. Comments were invited in writing, by email or on-line.

Although National Grid took Local Authorities’ advice on how the consultation should be conducted, the format and provisions of the consultation were National Grid’s responsibility. SLDC was largely happy with the effort put into ensuring the consultation was inclusive and the range of methods used.

The current consultation on the detailed route proposals employs the same or enhanced measures, however, SLDC and other Local Authorities have had concerns about the fact that the period of the consultation runs over the festive period and allows only very limited time (due to committee cycles and report lead-in times and the dates the consultation information was released) for Local Authorities to consider and prepare their responses. These concerns have repeatedly been raised with National Grid but not action has been taken due to the timescales National Grid is required to meet and concerns that these would not be met if the consultation was extended.

The amount of information being consulted on and the technical nature of much of it may make it challenging for some people to engage fully in the consultation. By responding to this consultation, SLDC can represent local residents, businesses and visitors and their interests and working with the wider PPA group has a strong voice to help secure the best outcomes on behalf of these groups.
## Step 2

### Equality Action Plan

In providing this service, what are the impacts for the following people?

1. Age (young and old)
2. Black and Minority Ethnic
3. Disabled
4. Faith/Belief
5. Sexual Orientation
6. Gender
7. Gender reassignment
8. Pregnancy and maternity
9. Marriage and Civil Partnership
10. Socio-economic disadvantage (including rural deprivation, ‘rurality’)

(See glossary below for definitions)

<table>
<thead>
<tr>
<th>ALL</th>
<th>Positive impacts</th>
<th>Negative impacts</th>
<th>Mitigating actions (to avoid negative impact):</th>
<th>Lead Officer &amp; When</th>
<th>Complete Y/N</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>National Grid have employed a very wide range of methods to raise awareness of and allow people to engage in their consultation.</td>
<td>The amount of information being consulted on and the technical nature of much of it may make it challenging for some people to engage fully in the consultation.</td>
<td>By responding to this consultation, SLDC can represent local residents, businesses and visitors and their interests and working with the wider PPA group has a strong voice to help secure the best outcomes on behalf of these groups.</td>
<td>Lorayne Woodend (before end of consultation period – 6\textsuperscript{th} January 2017)</td>
<td>Y (subject to Cabinet approval)</td>
</tr>
</tbody>
</table>

(See glossary below for definitions)
Step 3

Examples of good equality practice you have put in place (For example, all venues used are accessible for people with mobility, hearing and sight impairments)

Although National Grid took Local Authorities’ advice on how the consultation should be conducted, the format and provisions of the consultation were National Grid’s decision and responsibility. SLDC and other authorities were broadly happy that their advice had been taken into account insofar as they related to engagement methods.

The venues to be used for drop-in events are all accessible to those with mobility issues. The proposals can be viewed on large maps, using an electronic virtual reality system or described and explained by officers, meaning that disabilities as well as personal preferences can be taken into account. Documentation and tethered laptops were also available at convenient publicly accessible buildings. Of particular note is the delivery of a hard-copy newsletter to every household within the area directly affected by the proposals. The main protected characteristic likely to be used for profiling consultation responses would be age (since others are not relevant but categorising responders by age shows how broad the consultation process has been). Since registering to take part in consultation required you to enter your age, as does signing up to text consultation, we can be fairly satisfied that National Grid’s consultation will be representative of age. The consultation report of previous consultation also details how different groups (young people, older people, disabled people, geographically isolated etc) have been taken into consideration.

SLDC and other Local Authorities have had concerns about the period of consultation and the quantity and technical nature of much of the information and how this might make it challenging for some people to engage fully in the consultation. SLDC responding to the consultation to represent residents and others’ interests is a key way that these issues can be mitigated, at least in part.

The council has a list of equality contacts who can be contacted for consultation or to ask advice. The list is on the intranet under Equality and Diversity. If you need any support when completing this Equality Impact Analysis, please contact the Partnerships and Funding Officer.

Date: 17/11/16
EIA Author(s): Lorayne Woodend
Assistant Director: Ian Hassall
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EIA forwarded to Policy Officer Y

Glossary

**Age:** This refers to a person having a particular age (for example, 32-year-olds) or being within an age group (for example, 18-30-year-olds).

**Civil partnership:** Legal recognition of a same-sex couple’s relationship. Civil partners must be treated the same as married couples on a range of legal matters.

**Disability:** A person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. Includes: Physical/sensory disability, mental health or learning disability.
**Gender reassignment:** A person has the protected characteristic of gender reassignment if the person is proposing to undergo, is undergoing or has undergone a process (or part of a process) for the purpose of reassigning the person’s sex by changing physiological or other attributes of sex.

**Maternity:** The period after giving birth. It is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, including as a result of breastfeeding.

**Race:** It refers to a group of people defined by their colour, nationality (including citizenship), ethnic or national origins. Includes, Asian, Black and White minority ethnic groups inc. Eastern Europeans, Irish people and Gypsy Travellers.

**Religion or belief:** “Religion” means any religion, including a reference to a lack of religion. “Belief” includes religious and philosophical beliefs including lack of belief (for example, Atheism). The category includes Christianity, Islam, Judaism, Hinduism, Buddhism, and non-religious beliefs such as Humanism.

**Sexual orientation:** This is whether a person’s sexual attraction is towards their own sex, the opposite sex or to both sexes.

**Socio-economic disadvantage:** This includes people on low incomes, as well as issues around rural and urban deprivation, such as access to services and transport. Rurality should be specifically considered as South Lakeland is defined as ‘Rural-80’ – this means we have at least 80 percent of our population in rural settlements and larger market towns.