

Dalton Town Council Response to NWCC Section 42 Consultation Procedure

This is the written response from Dalton Town Council (hereafter to be referred to as DTC) to the Consultation Process undertaken by National Grid for the North West Coast Connections Project. The document is divided into three parts: a statement on why our Town Council representations are important to the consultation procedure, comment on the adequacy of consultation which is a critical facet that National Grid must report to the Planning Inspectorate and then our opinion on the various environmental, social and economic impacts which we feel must be addressed.

Due to the limited timeframe given to adequately digest information, receive technical advice and schedule suitable town or parish council meetings, the statement is made of Town Councillor Opinions on each matter. These are not decisions or resolutions and so we reserve the right to make further statements as interested parties to this process in the future.

1 Strength of Local Knowledge

The Cumbria Town and Parish Councils represent the interests of whole communities and understands the needs of different groups within (such as young and elderly people, local businesses and tourism). Representation held within this document from elected Councillors benefits from understanding of the local community, built from long term experience delivering services to meet local needs aiming to correctly appreciate then improving quality of life and community wellbeing. It is this long service that is critical to this response and the need for it to be assimilated by high quality consultation rather than only 'snapshot' assessment from a private consultancy based appraisal only made over a few months.

It is in our interests to speak on behalf of our community to identify real improvements, so we can best allow those communities to maintain their sense of purpose and belonging, protect very sensitive local business (small farming or tourism-reliant companies for example), and maintain the community strength and character that makes this area special to the UK.

We strongly believe and assert that this knowledge is critical to National Grid's decision making for options on the NWCC project as this is a once in a lifetime opportunity to get matters right and is a responsibility of decision making that, once constructed, will remain in this area for many generations of the people and business, this affecting the vitality of communities the Town Council represent for many generations.

For National Grid to achieve "the right overall balance" in the NWCC project, the benefit of these opinions must be clearly included as recognised influences on decisions before scheme option selections, not merely collated for construction efforts own sake. A developer that listens knows that it has better support for decisions it may take and has the benefit of getting design decisions right

and with less resistance; it would be shameful if National Grid did not take advantage of this significant local resource to achieve a better scheme.

2 Adequacy of Consultation Statement

Dalton in Furness has a population of over 8200, making it the second largest population in the borough. The next largest population is Askam in Furness with a comparatively small 3600 (figures based on 2011 census). For this reason DTC see it as an affront that DTC did not receive a formal consultation from National Grid regarding the NWCC project. We had been due to receive one but this was cancelled due to adverse weather conditions. After requesting a rescheduled consultation we were eventually told that Dalton was not deemed important enough to receive a consultation. This can only be a due to a lack of due diligence on National Grid's part as Dalton is one of the largest populations and will be directly affected by the project. Notably, agricultural land, tourism and businesses will be affected heavily, to say nothing of damage to the landscapes surrounding Dalton.

Due to having no consultation DTC was at a disadvantage from the beginning as we were unable to properly inform Dalton residents in good time about the project. The consultation period was stated as 10 weeks, which National Grid deem appropriate. However, at least two of those weeks will be lost due to the Christmas period, meaning councils and businesses will be closed for a large portion of the consultation period. Additionally, the Government's Code of Practice (which was adopted by the Planning Inspectorate) states that consultations should be a minimum of 12 weeks. As a council and based on the above reasons, we requested an extension but were told that it would not be possible.

This has lead DTC to believe that the consultation has been wholly inadequate and poorly managed.

3 Environmental Topics

3.1 Landscape and Visual

DTC are firmly of the opinion that this project will be detrimental to the landscape along the route and in particular, the landscape around Dalton in Furness. The 50m pylons proposed will dwarf the current pylons which can already be seen from most parts of the town. This project will further spoil the rolling hills around Dalton and the appeal of the town itself due to visual detractors. These spoilt vistas will detract from the landscape for both residents and visitors to the town.

3.2 Historic Environment

Dalton Castle is a significant landmark for Dalton and is an important historic building, currently protected by the National Trust and managed as a tourist attraction. The castles situation is on higher ground with views to the east, views which will be obscured by at least one pylon (mentioned as pylon MR-O1-164 in Volume 2.5 South Route Assessment Historic Environment section 8.5.55). National Grid have claimed in the aforementioned subsection that the significance of the effects on Dalton Castle will be "sight adverse". DTC strongly disagrees with this conclusion based upon the Castle's historical significance and its tourism-reliant existence. We believe that the adverse effects will be high, rather than slight.

The Grade II listed market cross and stone bench in Dalton in Furness are located adjacent to Dalton Castle on its eastern side. These form a significant landmark in Dalton and are an addition to the Castle's tourism attraction. For this reason, DTC believe that the effect of the project on this landmark is not neutral as suggested by National Grid in Volume 2.5 South Route Assessment Historic Environment Section 8.5.60, but rather the effect will be of medium significance, based again on the tourism attracted by that particular area of the town.

Section 8.5.72 of the above mentioned document states that there are 46 listed buildings within Dalton in Furness. As these buildings will be situated as close as 900m from the nearest project infrastructure, National Grid have declared that these buildings will not be affected. DTC feels that the project will have a detrimental effect on some or all of these properties as many are still inhabited by residents whose landscapes will be marred by this project, thus detracting from the appeal of these properties. We therefore argue that the significance of these effects is not neutral but rather it will be slight.

3.3 Traffic and Transport

National Grid has stated its intent to use helicopters in Volume 2.2 Introduction and methodology Proposed Development document section 4.5.14. DTC has concerns that this will damage useful agricultural land which is currently designated as greenbelt land and not commercial or employment land. National Grid have stated their intent to minimise damage to the land ("overlaying the ground with geogrid overlain with stone (but without the need to strip back soil)"). However DTC do not believe that damage to the land will be sufficiently reduced as the stone covering will not allow light to any grass below and will mean that once construction has finished, the land will not be usable for a long time thereafter. No grass will be left and the soil, while perhaps not contaminated, will be compacted so heavily that drainage may become an issue for the land, planting or growing crops will be untenable and even grass will not easily regrow to provide grazing land.

It is noted that construction activities will have a strong detrimental effect on access across fields and along narrow lanes which is likely to destroy public footpaths and have a major impact on residential amenity. It is our opinion that construction effects have not been addressed adequately within the PEI report and we would expect more detail to be provided within the PEI report.

DTC are heavily concerned about the number of HGV movements that National Grid are proposing. The council feel that the roads which will be used are already heavily congested, insufficient for current use and could not cope with the addition of hundreds of HGV movements per day. In particular, DTC would like to draw attention to the laydown site on the outskirts of Dalton in Furness, where a helipad is being proposed. The road from which access will be gained has a speed limit of 60mph and is a major route for motorists entering or leaving Dalton in Furness. This road provides the shortest route for both motorists and pedestrians to two large and popular local businesses, those being the South Lakes Safari Zoo and Charnley's Garden Centre (formerly known as Crooklands Garden Centre).

DTC feel that the proposed laydown site will cause safety risks to this section of the road as HGVs are slow moving and would have to cross oncoming traffic to gain access to the laydown site and would exit the laydown site very slowly as the turn would be tight, potentially causing an obstruction to oncoming traffic also. As this is a 60mph road, it is possible that other motorists could be

endangered by having to break suddenly. Pedestrians are also at risk on this part of the road as there is a pavement on the same side of the road as the laydown site. DTC deem this to be a factor of critical significance.

3.4 Construction Noise

Secondly on the matter of helicopter use, the number of flights per hour has been stated in section 4.5.16 of the above mentioned Proposed Development document as being "approximately" 12 deliveries per hour. This equates to 1 delivery every five minutes for what National Grid says will be 4 hours every day. One of the helipads proposed in National Grid's consultation is situated disturbingly close to South Lakes Safari Zoo. We believe that the noise from this could have a detrimental impact on many of the animals housed there.

DTC are concerned about the frequency of these deliveries and the noise pollution it will cause to the residents, schools, churches and businesses within and around Dalton in Furness. We believe that this will have a significant, detrimental impact on the quality of life for many people in the town and should be considered a medium significance impact.

3.5 Operational Noise

DTC and many residents of Dalton in Furness as well as residents of more remote properties and villages in the countryside are concerned about the operational noise of 400kV electricity lines. This is particularly an issue for residents of the Tythe barn cottages and Woodbine area, where residents will be encircled within two rows of pylons. DTC are concerned for these residents and request additional information regarding proposed mitigation for the people in this area.

We feel that the noise created by the lines will have a strong detrimental effect on those most closely situated and will heavily detract from these people's quality of life. DTC believe that this should therefore be considered a high significance impact.

3.6 Geology and Soils

The Furness peninsula and in particular, the land surrounding Dalton and Lindal in Furness, contains huge numbers of former iron ore mines which are not properly recorded or catalogued due to their age. DTC are concerned that this will lead to potential risks of ground collapse and thus believe this to be a major adverse impact.

Further from the former iron ore workings lies the issue of potential generation of radon gas. If National Grid do, as proposed, begin probing the potential sites for the pylons, this could easily "disturb" the former mines and potentially generate radon gas which can be lethal to humans and animals. DTC regard this as a major concern.

3.7 Socio-Economics, Recreation and Land Use

National grid have stated that construction would both cross and happen in close proximity to the South Lakes Safari Zoo, which is home to many endangered and exotic animal species. The zoo practices conservation on a large scale and has been recognised for its achievements in this area and it's efforts towards the protection of many of these animals and species. The zoo is able to continue its conservation efforts because of the income it receives from tourists, of which it attracts over 300,000 per year. National Grid has stated in section 17.3.85 of its Socio-Economics, Recreation and

Land Use document that construction works will need to take place across the entrance and car park of the zoo and will likely affect the visitors of the attraction.

In section 17.3.88 of the same document, National Grid states that some works would result in closure of the zoo attraction for the duration of the construction works. DTC regard this as wholly unacceptable due to the volume of visitors the attraction brings to the area and the good that it does in regards to its conservation efforts. National Grid have described this as a "significant" level of effect, however DTC see this as both a major and critical effect.

3.8 Environment

Concrete is not an environmentally friendly material and each of these pylons will require an average of 144m³ of Concrete (as stated in section 4.5.18 of National Grid's Proposed Development document). An estimated 27 pylons will cross the Furness peninsula, and this alone is a large volume of concrete and only reflects the volume needed for one row of pylon bases, to say nothing of the tunnel works and additional row of smaller pylons which will increase the amount of concrete needed by a dramatic amount.

DTC believe that if using so much environmentally harmful material when there is a viable and well-achievable alternative such as the offshore HVAC cable option, would be completely irresponsible. It will show a total disregard for future generations and for the environment, both of which as representatives of communities, we should be striving to protect. National Grid have the opportunity with this project to set an example of environmentally conscious infrastructure construction.

DTC believe that the offshore HVAC option is the most suitable for all parties as there is no disruption to the landscapes, land, traffic/roads, residents, businesses or exotic animals in the areas. DTC are keen to realise the potential jobs this project could create for the area and the investment that it will bring. Therefore it is our opinion that a HVAC offshore cable should be run from Kirkstanton to Walney where it would connect at Roosecote tunnel head and into the tunnel under Morcambe bay. This route would also ensure that no environmentally protected sites are crossed or even encroached upon and no existing offshore cables or pipes will be crossed, as would be the case with the Rossall landing option.

The offshore HVAC option, depending on where it leaves land in its southern direction eg Kirkstanton, could potentially avoid the LDNP section of the route, which would mean that no tunnel would be needed to cross the 14km section, thus saving the project over £450m.

3.9 Health Impact

DTC are concerned that the health impacts have not been assessed within National Grid's consultation. Primarily, we are concerned about the potential risk from Electro Magnetic Fields caused by the high voltage electricity lines. Government documents state that "EMFs can have both direct and indirect effects on human health. The direct effects occur in terms of impacts on the central nervous system resulting in its normal functioning being affected. There has also been discussion in the past relating to leukaemia clusters close to power lines. This has not been proved, yet it has not been disproved."

DTC believe that proper assessment should be carried out on the potential risks of the EMFs for the people, livestock and exotic animals (housed at South Lakes Safari Zoo) before erecting the pylons and electrical lines and endangering those mentioned above. If EMFs are found to be a health risk then to continue with this project in its current form would be contemptible. Endangering lives is not worth the risk when other options are so readily available.

4 Summary

The above points summarise out current representation and opinions of the adequacy of consultation process undertaken by National Grid. They include comment on why Town Council views, with their detailed local and often long term, in-depth understanding of the Parish areas geography, environmental and socio-economic characteristics are so important. Based on this deep seated knowledge, the commentary has also advised National Grid of specific issues, impacts and concerns about the quality and content of information they have based their NWCC project assessment and decision on.

Following on from this, we wish to remain involved in all steps of the DSCO process and in particular because of the reasons above, continue to be considered as an interested party for the purposes of the ongoing NWCC process.