

James Norman
New Transmission Investment Team
Ofgem
9, Millbank
London
SW1P 3GE

Working locally and
nationally for a beautiful
and living countryside

23 February 2017

Dear Mr Norman,

Response to Ofgem: 'North West Coast Connections - Consultation on the project's initial Needs Case and Suitability for Tendering'

The Campaign to Protect Rural England (CPRE) welcomes the opportunity to respond to this consultation. CPRE campaigns for a beautiful and living countryside. As well as our national office in London, we have 60,000 members and supporters, 43 county branches and more than 200 district groups across England. We have a long history of involvement in energy transmission issues, particularly in the 1930s and 1960s-1970s when the National Grid underwent significant development, and more recently in campaigning for the undergrounding of overhead lines.

CPRE welcomed the recent commitment by National Grid to underground powerlines for the NWCC project within the Lake District National Park, which is under consideration as a World Heritage Site. However, concerns remain about the impact of new pylons and lines on the setting of the National Park. We agree with Ofgem's conclusion that if NuGen commissions Moorside nuclear plant, there will be a need for the NWCC project.

CPRE is a member of the stakeholder advisory group for National Grid's Visual Impact Provision (VIP) project, which aims to reduce the impact of existing electricity transmission lines in English and Welsh AONBs and National Parks. We do not believe that National Grid's preferred route south from Moorside (onshore south with tunnel) is fully consistent with the aspirations of the VIP project as it would be seriously detrimental to the setting of the Lake District National Park. Instead, if this project goes ahead, it should be designed and routed in keeping with environmental constraints, pursuing a best practice approach that has no or little impact on the host landscape. The three options already considered by National Grid which would allow this are:

- offshore HVDC from Moorside to Stanah;
- onshore south with undergrounding through the Lake District then HVAC offshore from Kirksanton-Rossall;
- onshore south with undergrounding through the Lake District then a tunnel under the Duddon Estuary.

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However, these options have been dismissed owing to their higher costs. The lack of mitigation offered for landscape and visual impact on the Lake District by National Grid's proposed route means that the cost of the preferred route is not evaluated consistently with the other, seemingly more costly routes.

Friends of the Lake District, who represent CPRE in Cumbria, have been engaged with the NWCC project since its inception and we support the points that have been raised in their response to both this consultation and to National Grid's Preliminary Environmental Impact Report.

Regarding the suitability of this project for tendering, we believe that the sensitivity of the Lake District National Park and its setting means that a comprehensive and consistent approach is needed. Splitting a project into separate packages increases the risk of flaws in communication and coordination, with higher risks of damaging landscape impacts. We encourage Ofgem to appoint one provider for the NWCC project, but only once there is confirmation that Moorside nuclear plant has been commissioned.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Shaun Spiers'.

Shaun Spiers
Chief Executive