

Dear Mr. Norman,

I write on behalf of the Broughton Community Plan Steering Group in response to OFGEM's current consultation on the North West Coast Connections Project.

With regard to National Grid's **southern route** proposal for the above project, we do not believe that sufficient weight was given to the importance of the setting of the Lake District National Park. As a result, an alternative offshore route was not sufficiently explored or costed prior to consultation.

With regard to the above, we have three specific points to make:

- 1) Residents of Duddon Parish highly value the local environment and landscape as illustrated by the responses to a 2015 community-wide consultation which sought opinions on a range of topics such as transport, housing, local services and the local area. 329 questionnaires were completed - over a third of the parish adult population. In response to the question "*How important are the following aspects of your local area to you?*" **96.35% of respondents rated the landscape as either very important (80.85%) or fairly important (15.5%).**

As such, it can be inferred that an offshore route would be preferable to an onshore one for the great majority of our residents since the offshore option will have the least impact on the beauty of the southern Lake District landscape. The full Broughton Community Plan can be viewed here:

<http://www.cumbriaaction.org.uk/LinkClick.aspx?fileticket=wS-LwQ0-ozU%3d&portalid=0> Yet National Grid did not provide residents with any other option than pylons in the final stage of consultation or indeed provide sufficient costings of possible alternatives.

- 2) It is disappointing that OFGEM's Consultation document also does not appear to give due weight to the importance of the wider setting of the Lake District National Park: Section 2.20 states: ***Undergrounding the section of the route within the LDNP adds an estimated £340m to the cost of the project as opposed to if the route was completed using only overhead lines. As such, as part of our considerations we looked at the requirements for undergrounding in a national park and reviewed an NGET analysis of consumer willingness to pay for visual mitigation within the LDNP.***

We would therefore ask that OFGEM considers the requirements for undergrounding – and also alternatives such as offshore solutions – with respect to the setting and not solely the boundaries of a National Park. Was in fact any analysis carried out by NGET of consumer willingness to pay for visual mitigation not just within the LDNP but in its wider context?

- 3) The Lake District National Park Authority's Conservation Area Appraisal and Management Plan (February 2013) for the Broughton-in-Furness Conservation Area <http://www.lakedistrict.gov.uk/planning/conservationareas/broughtonca> refers several times to the importance of the setting of this conservation area and its views. For instance: Page 22 says "From the outskirts of the conservation area there are several good scenic views of distant fells and the Duddon Estuary. Such views are an

important feature of the conservation area, providing a strong link between the town and its rural surroundings.”

Also, Section 1.11 on Page 37 states: “**Enhancing and protecting views & the setting of the conservation area** As noted in the Broughton Conservation area appraisal, the setting of the conservation area and views within, into and from the area are very essential elements to its character and appearance. It is important that development, enhancement and public realm work takes account of the setting of the conservation area and important viewpoints and that these are preserved or enhanced so that the special character of the conservation area is retained. Important views are identified on the Townscape Appraisal map in the character appraisal.”

Some of these important views would indeed be adversely impacted by National Grid’s proposal for taller pylons in this area and insufficient importance was given towards mitigating this by fully exploring alternative solutions.

We would therefore request that OFGEM gives due weight to the above when considering how adequately NGET has assessed and then narrowed down the options it has taken forward to its planning consultation.

Yours sincerely,

Annette Carmichael  
Chair, Broughton Community Plan Steering Group