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By email to: nationalgrid@northwestcoastconnections.com

Heaton-with-Oxcliffe Parish Council Response to North West Coastal Connections (NWCC) Section 42 Consultation Procedure

This is the written response from the Heaton-with-Oxcliffe Parish Council in North Lancashire to the Consultation Process undertaken by National Grid for the North West Coast Connection project. The document is divided into three parts: a statement on why our Parish 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, and questions about, the various environmental, social and economic impacts which we feel must be addressed.

Due to the limited timeframe given to digest information adequately, to receive technical advice, to gather additional relevant data and to schedule suitable meetings of the Parish Council to consider such information, advice and data, a statement is made here of Parish Council opinions and questions 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

Lancashire Councils represent the interests of whole communities and understand the needs of different groups within their local area, including young and elderly people, local business and tourism and people living in varying circumstances. Representations made within this document from elected Councillors benefit from an understanding of the local community, built from long term experience of delivering services to meet local needs aimed at improving quality of life and community well-being. 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 being a 'snapshot' assessment from an appraisal carried out over a few months.

It is in the interests of local communities that real concerns and improvements are identified by their Parish Councils, so that those communities can maintain their sense of purpose and belonging; sensitive local business (small farming and tourism reliant companies, for example) can be protected, the local environment and the quality of life of local residents can be maintained and the strength and character of the local community preserved.

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'. The infrastructure will remain in this area for many generations of local people and business, thus affecting the vitality of communities that the Parish Councils represent.

It is necessary for Heaton-with-Oxcliffe Parish Council to speak out on this matter since the Middleton sub-station (where the southern tunnel head is planned to surface) is located a couple of kilometres from its Parish boundary.

For National Grid to achieve “the right overall balance” in the NWCC project, the benefit of Parish Council opinions must be clearly included as recognised influences on decisions relating to the scheme, rather than merely being a collation of consultation responses. A developer knows that by listening to local people it will get better support for decisions it may take and will have the benefit of getting design decisions right. It would be highly regrettable if National Grid did not take advantage of this significant local resource to achieve a better scheme.

2. Adequacy of consultation period and scheme information

The Parish Council is concerned that the 10-week consultation period running from 28 October 2016 to 6 January 2017 does not give sufficient time to respond adequately to the S.42 consultation. The timing of the consultation is such that consideration of the details of the scheme are restricted by the lead- in time needed to make informed decisions prior to the Christmas break in order to meet the 06 January 2017 deadline.

In addition, the Parish Council is concerned that insufficient technical information and evidence in support of the scheme has so far been provided by the National Grid. The Parish Council considers that this does not afford an opportunity to deliberate the wider implications of the scheme or, given the short timescales, provide sufficient time to properly respond on the basis of local sensitivities and impacts and for these to be properly considered by relevant technical specialists.

3. Environmental and Noise Matters

The Parish Council wishes to raise a number of issues and has several questions relating to the environmental impact of the project.

The Parish Council notes that very little reference has been made in the planning policies of the principal authority, Lancaster City Council. As such, there is concern about what level of detail, or whether any, consideration has been given to the Lancaster District Local Plan and Core Strategy and the core principle that any proposed development is ‘... appropriate to the character of the landscape’.

There is also no reference to a range of important environmental and development management District-level and regional policies that seek to protect and enhance nature conservation sites, urban green spaces, landscapes, water courses and archaeological features and monuments.

The Parish Council have significant concerns regarding the construction of a tunnel under Morecambe Bay and, in particular, the impact and location of the tunnel head in the areas of Heysham and Middleton. The potential disruption and impacts resulting from the use of tunnelling technology and connection of underground cables and the construction of the new substation at Middleton is unclear, as is any assessment of risk and actions that will be in place to mitigate these.

The Parish Council considers that the information available relating to the processes in the construction of the tunnel is not in sufficient detail to enable a full assessment of the implications and impacts to be made, or for further consideration to be given to any other options as part of either the operational or construction phases of the project.

It is not clear what will happen to the materials that will be dug out to construct the tunnel. How will disposal of the debris/materials be managed, stored or disposed of safely and sustainably?

The Middleton substation and site compound will be in close proximity to several properties. No evidence or detailed information has been provided that demonstrate how the visual, noise and environmental impact of the construction on residents and the surrounding area and landscape will be mitigated over many years of operation.

Specifically, what measures will be taken to protect public rights of way in the area, including a footpath and woodland area? Will additional planting of trees and shrubs be provided to improve the landscape?

How will surfaces be disrupted during the construction of the tunnel and the Middleton Substation and the latter's subsequent operation, and what mitigation will be taken to address this?

What will be the noise impact on local residents during the construction and operational phases of the tunnel and the Middleton Substation from:

- traffic noise;
- vibrations from transformers and plant;
- ventilation and cooling fans; and
- overhead power lines

The Parish Council is unclear what consideration has been given to the planned Heysham Gateway project and any environmental implications or conflicts arising from two major schemes running concurrently?

The Parish Council would like clarity and further detail on the ecological data and assessments that have been undertaken to determine the likely affect that the project will have on wildlife, birds and the woodland habitat in the local area. How extensive have these assessments been and what are the conclusions? What actually will be done to protect wildlife and the local habitat? What, if any, impact will the project have on the nearby Heysham Nature Reserve?

4. Heritage Matters

Consultation documents refer to heritage assets in the Heysham and Middleton area such as St Peter's Church which is a Grade 1 listed building and the nearby archway and the non-designated grave slab, that form part of the Heysham Conservation area.

The Parish Council would like further detail on how these, and any other known or, as yet, unknown, archaeological and heritage assets will be protected. What will be the potential effects of the scheme on them and how will the risks be mitigated? Heysham and district potentially has an important history dating back to the Anglo-Saxon era and it is, to date, largely unexplored by archaeologists.

5. Transport Matters

How and to what extent will the construction of the tunnel and developments at the Middleton substation affect traffic and transport links and traffic volume and density in the local area?

What assessments have been/will be made to determine the impact of the scheme on the Bay Gateway, which has recently been opened? The Bay Gateway has significantly reduced traffic and HGV traffic in particular through Heaton-with-Oxcliffe. What assessment has/will be made to monitor and mitigate any increases in traffic and related environmental consequences?

Will the scheme take into account and/or provide support for Lancashire County Council's HGV Strategy?

What will be the impact of the scheme on Heysham Port and its facilities? Will the scheme take advantage of Heysham Port and, if so, has an assessment been made on its capacity to support any increased usage?

6. General Comments/Questions

What are the National Grid's expectations in relation to the workforce needed during the construction in the Heysham/Middleton area?

The Lancaster District Local Plan highlights that *"there is a mismatch between the skill levels of local adults and the skill levels required by major contractors and sub-contractors. This is a major reason for a high level of 'commuting in' by lead contractors' suppliers and sub-contractors.* This suggests that a large proportion of the workforce will be commuting or require accommodation in the local area. Has this been taken into account and, if so, what conclusions were made on the availability of suitable local accommodation for the workforce?

The Parish Council considers that, on the basis of the documentation provided, the project does not sufficiently demonstrate the need for the overall scheme, or that the case for constructing a tunnel under Morecambe Bay to route cables to a substation at Middleton is well made.

The Parish Council is also concerned about the validity of the long term timescales and cost of the scheme and to what extent this will be passed on to electricity consumers.

7. Summary

All of the above points summarise the current representations and opinions of Heaton-with-Oxcliffe Parish Council around the adequacy of the consultation process undertaken by National Grid and the impact the scheme could have on the local area based on our detailed local and in depth understanding and knowledge of the geography, environmental and socio-economic characteristics of our Parish. The Parish Council has also raised specific issues, concerns and questions about the about the impact of the scheme and, to a certain extent, the quality and content of information upon which the National Grid has based their NWCC project assessment and decisions.

Following on from this consultation, Heaton-with-Oxcliffe Parish Council wishes to remain involved in all steps of the planning process and to continue to be considered as an Interested Party for the purposes of the ongoing NWCC process.