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C. A Rowntree

Tel: [REDACTED]  
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14<sup>th</sup> September 2017

Y/r: ENO20007

fao Kay Sully [Case Manager]

The Planning Inspectorate  
Temple Quay House  
2 The Square  
Bristol BS1 6PN

Dear Ms Sully

North West Coast Connection Project

I write on behalf of this group of concerned professional local residents who are objecting to elements of the scheme proposed by National Grid for the route for the North West Coast Connections from the proposed nuclear power station at Moorside, Cumbria.

We participated fully in the ten week public Consultation mounted by NGET which concluded in January. Our major concern now is that National Grid have thrown the integrity of their entire exercise overboard by refusing to disclose the responses they received from the over 8,000 citizens who took part. This, we feel, characterises the spirit with which the Consultation was pursued.

Our local experience at the visit of the NWCC Road Show to Kirkby in Furness was that the majority of the NGET personnel deputed to face the public appeared to be non-technical front office and HR staff who were at a loss when confronted with technical questions. Only the Consultation Manager, Mr Powell, seemed to be authorised to offer any response and he was kept busy. [As Mr Powell himself observed this area has probably more people than almost anywhere in the UK with PhDs and other professional qualifications that enables them to design and build the most sophisticated nuclear submarines and complex pieces of engineering on the planet, so it is bizarre that such a weak team was mounted for the exercise.]

This leads us to the firm impression that underlying their Consultation there was on the part of National Grid an attitude of arrogance and an intention not so much to consult as to seek to gain a rubber stamp for a scheme that was already settled. For the feedback from the exercise to be still withheld after eight months and possibly not released until it is attached to the DCO application is inexcusable. This implies to the public that not only are the honest opinions they ventured at the Consultation being blatantly disregarded but also that there will be no further consultation, as promised at your meetings with NGET. So far as our own Group is concerned, this indicates that there will be inadequate opportunity within the DCO time frame for any considered response to be secured from NGET for our costed offshore proposal from Selker Bay to Walney.

Early in their Consultation NGET intimated that at an early stage they would place all feedback on their website. This has not been done and we consider that the pausing of the Moorside project in no way justifies this breach of trust with the general public on the part of the promoters of the Consultation.

We have taken note that at the meetings between your representatives and NGET in January and March, National Grid advised that *"Issues arising from the Consultation that had so far been identified included: consideration of alternative technology in the setting of the National Park and in particular the Duddon Estuary"* and that *"Depending on what is decided, further consultation may be undertaken, but this is likely to be on a targeted, geographical basis."* This indicated that within three weeks of the end of their public Consultation, NGET had already received an analysis of the feedback and come to preliminary conclusions. For this information to be withheld is a considered and flagrant abuse of the first principle of public engagement. The idea that *"further consultation"* may be undertaken when no acknowledgment has been given to that already conducted is ludicrous.

In a letter dated 14<sup>th</sup> July OFGEM gave their updated view on the initial needs case of the NWCC project in the light of responses to their own consultation conducted in December 2016. OFGEM noted that more than half of their respondents *"suggested that NGET had not accurately assessed the visual impact of the NWCC route on the 'setting' of the LDNP and that NGET has underestimated the importance of the setting in legislation and planning guidance."* Also *"The majority of respondents expressed the view that NGET has not done enough work to explore the cost or deliverability of subsea alternatives to its preferred connection option. Most of these respondents welcomed our view that the cost difference between the preferred connection and the subsea cable alternative is relatively finely balanced. One correspondent proposed a new subsea route that NGET had not previously assessed in detail."* We see no reason to believe that the general tenor of responses to the NGET Consultation would be greatly different to those made in the OFGEM feedback.

This Group has developed two costed alternative routes that would avoid imposing the line of 50m and 60m pylons through the Whicham Valley and around the Duddon Estuary. We have received no cooperation from NGET in this endeavour but believe that the likely costs of an offshore route are comparable with the NWCC onshore proposal if necessary mitigation costs are factored in. We have been encouraged that our initiative has been acknowledged by OFGEM in its statement on NWCC dated 14<sup>th</sup> July and quoted in the above paragraph.

The refusal of NGET to publish the feedback from the NWCC Consultation reflects an underlying tactic of obstructiveness which creates difficulties for alternative solutions to be advanced and reduces the capacity of interested members of the community to assess the degrees of mitigation that will be necessary to make any proposed route acceptable.

The OFGEM letter of 14<sup>th</sup> July to stakeholders stated the Office's expectation that *"both NuGen and NGET (will) keep OFGEM and local stakeholders informed of further updates on their respective projects."* National Grid's only public utterance has been a statement issued to our local newspaper reading: *"The feedback from the latest round of consultation will be published in a report that summarises the responses we received with analysis of how we could address them in our plans. As all works on the North West Coast Connections Project has been put on hold while NuGen conduct their strategic review, no decisions have been taken and the review and analysis of consultation feedback has yet to be carried out. We will restart the project when we can better understand NuGen's timeline to ensure our connection is ready at the right time. The analysis of feedback and how that may shape out proposals is one of the activities the team will be undertaking when the project re-starts. The consultation report will accompany the application for consent when we submit our finalised proposals to the Planning Inspectorate."* This statement is at variance with the indication you were given by NGET at your meeting with them on 14<sup>th</sup> March that they anticipated having the Consultation report ready 6 to 8 weeks in advance of submission of the DCO. At that meeting you had also counselled the NGET representatives that *"they should keep the local*

*community informed as much as possible*" and heard that they were *"attending regular meetings with various stakeholder groups."* So far as this group of stakeholders is concerned we have had no contact from NGET and share the feelings of anger and distrust now abroad in local communities.

We believe that the entire public perception of the Moorside proposal and the necessary transmission services is being compromised by the behaviour of NGET. The obfuscation and obstructiveness of their dealings with the community in their Consultation and their refusal engage intelligently with groups broadly sympathetic to the main project has done and is doing much harm.

It is our hope that the Inspectorate will bring some influence to bear on National Grid to show respect for those in the local communities who took part in the NWCC Consultation. While there is a now general recognition that the Moorside project is paused, we would encourage the Planning Inspectorate to direct NGET to fulfil its moral duty to publish the Consultation responses on its website without further delay. It would be good also if, during the present hiatus in the NuGen development, NGET applied some genuine effort to rebuilding a constructive rapport with the key community groups who have shown themselves to be prepared to engage with them in evolving the most effective and economic solution to the transmission issues in Cumbria.

Yours sincerely

A large black rectangular redaction box covering the signature of the sender.

C.A.Rowntree (I.Eng., IMarEST.)