

AGENDA

Environment and Economy Overview and Scrutiny Panel

Thursday, 01 December 2016 AT 10:00 In the Flensburg Room, Civic Centre, Carlisle, CA3 8QG

A preparatory briefing will be held for Members of the Panel will be held at 9.15am in the Flensburg Room.

Apologies for Absence

To receive apologies for absence and notification of substitutions

Declarations of Interest

Members are invited to declare any disclosable pecuniary interests, other registrable interests and any interests, relating to any item on the agenda at this stage.

Public and Press

To agree that the items of business within Part A of the agenda should be dealt with in public and that the items of business within Part B of the agenda should be dealt with in private.

Minutes of the previous meeting

7 - 16

To approve the Minutes of the meeting held on 15 September 2016. [Copy Minutes in Minute Book Volume 43(3)]

To note the Minutes of the meeting held on 27 October 2016. (Copy Minutes herewith)

PART A

To be considered when the Public and Press are present

A.1 CALL-IN OF DECISIONS

To consider any matter which has been the subject of call-in.

A.2 OVERVIEW REPORT AND WORK PROGRAMME

17 - 26

To consider a report providing an overview of matters related to the work of the Environment and Economy Overview and Scrutiny Panel, together with the latest version of the Work Programme and details of the Key Decisions items relevant to this Panel as set out in the Notice of Executive Key Decisions.

(Copy Report OS.24/16 herewith)

A.3 BUDGET 2017/18 - 2021/22

(Culture, Heritage, and Leisure Portfolio, Finance, Governance and Resources Portfolio, and Communities Health and Wellbeing Portfolio)

Members are reminded that the Budget reports were circulated to all Overview and Scrutiny Members on 11 November 2016. Members are asked to bring the relevant budget reports to the meeting. The Executive Decisions from 21 November 2016 will be circulated to Members on 23 November 2016, hard copies will be tabled at the meeting.

Revenue Budget Reports:

(a) Budget Update – Revenue Estimates 2017/18 to 2021/22 pages 1– 17

To consider new revenue spending pressures and reduced income projections which fall within the area of responsibility of this Panel:

Car Parking	p.6, 12, 14
Clean Up Carlisle	p.7, 14
Economic Regeneration Team	p.7, 14
Enterprise Centre Income	p.7, 12. 14
Community Infrastructure Levy	p.7, 12, 14

Proposals for Transformation Savings (Appendix C – p.13)

(b) Individual Charges Reviews pages 18 - 101

To consider and comment on the Review of Charges in respect of the following areas which fall within the area of responsibility of this Panel:

Community Services

• (City Centre Management	p.20
• (Car Parking	p.20
• (Green Spaces	p.21
• 7	Fourist Information Centre	p.23
• \	Waste Services and Street Cleaning	p.24
• (Garage Charges	p.24
• E	Enforcement Charges	p.24
• 5	Summary of Income	p.25

Economic Development - pages 43 - 53

Governance and Regulatory Services

•	Environmental Health	p.55
•	Summary of Income	p.64

(c) Revised Capital Programme 2016/17 and Provisional Capital Programme 2017/18 to 2021/22 pages 102 - 111

To consider the Chief Finance Officer report RD.36/16 and in particular comment on the capital spending which falls within the area of responsibility of this Panel:

•	Vehicle and Plant	p.105
•	Public Realm	p.110
•	Castle Way	p.110
•	Old Town Hall Phase 2	p.110
•	Vehicle and Plant	p.110
•	Public Realm Projects	p.110
•	Kingstown Industrial Estate	p.110
•	Crindledyke Cycleway	p.110
•	Durranhill Industrial Estate	p.110
•	Market Hall Roof	p.110

A.4 FLOOD UPDATE REPORT

27 - 34

(Cross Cutting)

The Deputy Chief Executive to submit a report providing an update on the recovery of Council assets, the provision of grants and relief to flood affected households and businesses, and details of the Carlisle Flood Response Plan.

Mr Andrew Brown, Environment Agency, Ms Angela Jones, Cumbria County Council, have been invited to attend the meeting to give a presentation and update on the Section 19 report. (Copy report SD.31/16 herewith. Copy presentation to follow).

A.5 NORTH WEST COAST CONNECTIONS PROJECT - S42 CONSULTATION RESPONSE

35 - 86

(Economy, Enterprise and Housing)

The Corporate Director of Economic Development to submit a report detailing the issues for consideration in relation to the National Grid's consultation on the North West Coast Connections project. This matter is included in the Notice of Executive Key Decisions and is scheduled to be considered by the Executive on 19 December 2016.

(Copy report ED.42/16 herewith).

A.6 2ND QUARTER PERFORMANCE REPORT 2016/17

87 - 104

(Cross Cutting)

The Policy and Communications Manager to submit performance monitoring reports relevant to the remit of the Environment and Overview and Scrutiny Panel.

(Copy Report PC.24/16 herewith)

PART B

To be considered when the Public and Press are excluded from the meeting

-NIL-

Members of the Environment and Economy Overview and Scrutiny Panel

Conservative – Christian, Mitchelson, Nedved (Chairman), Bloxham (sub), Mrs Parsons (sub), Mrs Mallinson (sub)

Labour – Bowditch (Vice Chairman), Mrs Coleman, Dodd, McDonald, Burns (sub), McNulty, Ms Patrick (sub)

Independent – Betton, Paton(sub)

Enquiries, requests for reports, background papers, etc to Committee Clerk: Jacqui Issatt - 817557 or jacqui.issatt@carlisle.gov.uk

Minutes of the previous meeting

ENVIRONMENT AND ECONOMY OVERVIEW AND SCRUTINY PANEL

THURSDAY 27 OCTOBER 2016 AT 10.10AM

PRESENT: Councillor Nedved (Chairman), Councillors Bowditch, Christian, Mrs

Coleman, McDonald, McNulty (as substitute for Councillor Dodd),

Mitchelson and Paton (as substitute for Councillor Betton).

ALSO PRESENT Councillor Mrs Bradley – Economy, Enterprise and Housing Portfolio

Holder

Councillor Glover – Leader (from 11.50am)

Councillor Burns – Observer (for agenda item A.2)

OFFICERS: Deputy Chief Executive

Contracts and Community Services Manager

Development Manager

Neighbourhood Services Manager Neighbourhood Team Leader

Policy and Communications Manager

EEOSP.59/16 APOLOGIES FOR ABSENCE

Apologies for absence were submitted on behalf of Councillor Betton and Councillor Dodd.

EEOSP.60/16 DECLARATIONS OF INTEREST

There were no declarations of interest affecting the business to be transacted at the meeting.

EEOSP.61/16 PUBLIC AND PRESS

RESOLVED – That the Agenda be agreed as circulated.

EEOSP.62/16 MINUTES OF PREVIOUS MEETINGS

The Minutes of the meeting held on 15 September 2016 were circulated and Members raised the following matters:

EEOSP.55/16 – Resolution 2 – When would the information regarding the work being undertaken on riverbanks and bridges be available for Members?

The Deputy Chief Executive reported that a meeting had been scheduled with consultants WYG to discuss the work; the information would then be brought back to the Panel.

EEOSP.55/16 – Sheepmount Car Parking – The car parking difficulties at the Sheepmount during football match days had continued. A Member asked what could be done to address the problems given that people were paying fees to use limited facilities as well as having no car park facilities.

The Contracts and Community Services Manager reported that the car park at the Sheepmount would not be reinstated ahead of the completion of work on the site. The car

park would be used by contractors and could not be opened to the public at weekends due to the unstable nature of the structure following the floods. The safety of the car park could not be guaranteed so the decision had been taken to close access to the public until it could be fully repaired. He added that he would be meeting with representatives of the football leagues to make arrangements for permits to be issued for use by football teams to coincide with the hiring of the football pitches. The permits would allow users to park on Devonshire Street Car Park for free during certain periods of time on match days. The discussions with the football leagues would determine how the permits would be issued and monitored.

EEOSP.55/16 - Resolution 3 – When would the proposals for the ground floor of the Civic Centre come forward and which Panel would be involved in the process?

The Deputy Chief Executive responded that the Joint Management Team had held informal discussions with regard to the use of the Civic Centre tower and ground floor. The work had not begun due to other priorities following the flood. The process for the project would follow the same guidelines as other projects and the decision making process would go through Executive, Overview and Scrutiny and Council. WYG Consultants was due to submit a brief for the work including timescales and costings. The timescale included in the brief would determine the process timescale.

In response to a further question the Deputy Chief Executive clarified that the brief from the consultant would provide information on what was affordable and what would be covered under the insurance terms.

RESOLVED – That the minutes of the meetings of the Environment and Economy Overview and Scrutiny Panel held on 15 September 2016 be noted.

EEOSP.63/16 CALL-IN OF DECISIONS

There were no items which had been the subject of call-in.

EEOSP.64/16 OVERVIEW REPORT AND WORK PROGRAMME

The Policy and Communications Manager presented report OS.22/16 providing an overview of matters relating to the work of the Environment and Economy Overview and Scrutiny Panel.

The Policy and Communications Manager reported that the most recent Notice of Executive Key Decisions, copies of which had been circulated to all Members, had been published on 23 September 2016. There was only one item which fell within the remit of the Panel and would be submitted to the Panel at their meeting on 1 December 2016:

KD.21/16 Budget Process 2017/18 - The Executive would be asked to consider strategic financial issues arising from the budget setting process.

Members raised no questions or comments on the Notice of Executive Key Decisions.

The Panel's current work programme was attached as Appendix 1 to the report. Members were asked to note and/or amend the programme.

The Policy and Communications Manager informed Members that inaccurate data had been provided for recycling performance in the last Quarter 1 Performance Monitoring

Report. As a result of the information a data quality check was being carried out, the result of which would be shared with the Panel in the next Performance Monitoring Report. It was reported that the Scrutiny Chairs had recently discussed the possibility of changing the current panel remit structure, to better align with the Council priorities, current challenges faced by the Council and to address current Scrutiny best practice. They resolved that the proposals for three new Overview and Scrutiny Panels be considered by each of the Political Groups with feedback being submitted to the Scrutiny Chairs Group at their next meeting on 11 November. The Chair of Environment and Economy Overview & Scrutiny Panel had requested that the views of this Panel were sought. Member's attention was drawn to Appendix 2 of the report which contained details of the proposals and rationale for the changes.

The Panel discussed the options for the future of Overview and Scrutiny and agreed that three Panels should be retained and their remits amended as set out in the report.

RESOLVED – 1) That the Overview Report (OS.22/16) incorporating the Work Programme and Notice of Executive Key Decision items relevant to this Panel be noted.

2) That the following items be included on the agenda for the Panel's meeting scheduled for 1 December 2016:

Budget Proposals 2017/18
Environment Agency / County Council Flood Update
NW Coast Connections Project – consultation
Performance Monitoring

3) That the Environment and Economy Overview and Scrutiny Panel supported the decision of the Scrutiny Chairs Group and agree that three new Overview and Scrutiny Panels be established, as set out in appendix 2 of report OS.22/16.

EEOSP.65/16 UPDATE ON PUBLIC REALM IMPROVEMENTS

The Development Manager delivered a presentation which updated the Panel on Public Realm Projects around the City.

He provided an update and Members asked questions on each of the projects;

Paddy's Market

The phase I public realm improvements to Paddy's Market Car Park had been completed using Section 106 funding from Sainsbury's and the second phase was to install some public art. Additional funding for the art had come from McVities and Hunter Davies.

The Contracts and Community Services Manager explained that a brief had been put together for the art which would be used as part of the tender process for artists. The brief was dictated by a general desire to celebrate the social and industrial heritage of Caldewgate, significantly Carr's / McVities factory.

Milbourne Street

Improvements to the seating area at the junction of Castle Way and Milbourne Street had been completed using Section 106 funding from Sainsbury's.

Castle Way Crossing

Planning permission for a new Toucan crossing on Castle Way had been approved on 16 September. As part of the S.278 agreement the City Council had responded to the issues raised by the County Council's Highway and Transport Working Group. The new crossing would be funded from S.106 money from Sainsbury's and if it was not spent by February 2017 the money that had not been used would have to be returned to Sainsbury's.

In response to a question the Development Manager explained that the County Council now had the final decision on the crossing under S.278, however, the City Council had complied with all of their conditions. The crossing also complied with the requirements of the S.106 which stated that the monies could only be used to make the development acceptable in planning terms.

A Member highlighted the recent petition which had been submitted by members of the public regarding the crossing and questioned how the petition would impact the work officers were undertaking.

The Development Manager explained that if the County Council gave the go ahead all of the correct permissions to begin work would be in place, the decision full Council took with regard to the petition may impact that.

The Economy, Enterprise and Housing Portfolio reminded the Panel that the petition was a matter for the constitution and governance of Council and the impact of any decisions made were not in the remit of the Development Manager.

The Deputy Chief Executive added that the Monitoring Officer would be asked to produce some written advice for Members with regard to what decisions Members could take and the impact of the decisions. He reminded the Panel that the plans for the crossing had been the subject of a wide consultation process and the responses to the consultation had been minimal.

A Member asked for clarity with regard to the funding of the crossing and the Development Manager explained that S.106 agreements had an end date for the expenditure of money; if the monies was not allocated or spent they would have to be returned the provider. In terms of the crossing the monies would go back to Sainsbury's. He added that the money could not be spent anywhere else; it had to be used to make the Sainsbury's development acceptable. The crossing allowed access by all acceptable means for residents of the City.

The Economy, Enterprise and Housing Portfolio urged Members to explain the financial situation of the crossing fairly to avoid any unnecessary confusion about where the money came from or how it could be used.

City Centre Orientation

A network of signage would be installed around the City Centre to aid pedestrian navigation and improve the visitor experience. The signage would encompass information hubs and a new system of finger posts. The scheme locations had been refined in conjunction with Cumbria County Council and the information hub copy and design had yet to be finalised. In addition to the work the City Council had undertaken at the request of the County Council they had suggested that the City Council should consult with all affected neighbours at each location. Work was being carried out on how this could be undertaken. Once the consent process was completed the installation could begin.

A Member asked if the scheme had to go back to the Local Area Committee for final consent. The Development Manager agreed to check this and inform Members.

Members were frustrated that the scheme had been delayed again due to a further change in expectations from Cumbria County Council and questioned whether the scheme would actually go ahead.

The Development Manager assured Members that the City Council had met with all of the requirements and would push to ensure the scheme was delivered.

Bandstand Replacement

The existing temporary bandstand had reached the end of its life expectancy. The design of the replacement had not been determined yet but it would be a permanent facility located in the same position.

A Member asked if any analysis had been carried out with regard to the usage of the bandstand and if any research had been carried out on where was the best location, including placing it back in the park.

The Development Manager reported that it was felt that the bandstand should remain in the City Centre and a number of locations within the pedestrianised area had been investigated. However, it had been difficult to achieve the same space and viewing space as the existing bandstand. In terms of use the bandstand was well used and was often used in conjunction with main events been held in the City Centre.

In response to a further question the Development Manager explained that the existing bandstand was mobile but in practice it was difficult to move so remained in situ. He agreed to take the suggestion to make it mobile back for consideration.

A Member asked if any consideration had been given to moving away from a traditional Victorian style bandstand to encourage mixed usage.

The Development Manager explained that a variety of designs were being considered including more modern designs, which were not as decorative as the Victorian designs.

Members agreed that the bandstand was an asset to the City Centre and supported its replacement.

Court Square

There would be some minor improvements to Court Square which would involve covering over the former toilets and removing the railings which would result in a more open space and improved pedestrian access from the station. The improvements were short term prior to a comprehensive redevelopment of Court Square.

In response to a question the Development Manager explained that the redevelopment of Court Square would be a separate project to the development of the Citadel buildings but there would be linkage through the infrastructure. He added that the toilets had been closed for a number of years and there were no plans to replace the toilets at Court Square and there were facilities available in the Station. Should the station want to put tickets barriers in to limit access they would require Listed Building Consent from the Council and we were currently unaware of any proposals to restrict access.

Members commented on the high number of rail replacement buses in use and issues they were causing outside the station, they asked if this would be addressed in the future plans for Court Square.

A Member pointed out that the iron railings may of some value and asked for their disposal to be monitored carefully.

The Development Manager confirmed that the project would look at putting some traffic measures behind the station to improve the entrance to the station.

RESOLVED – 1) That the Development Manager's presentation be welcomed and noted;

- 2) That a further update on the Public Realm Project be submitted to the Panel in twelve months' time with any significant issues arising being reported to the Panel as required;
- 3) That the Monitoring Officer be asked to prepare and circulate advice to all Members of the Council on the decision making process for considering the Castle Way Crossing Petition at Council.

EEOSP.66/16 UPDATE ON CLEAN CARLISLE

The Neighbourhood Services Manager presented report SD.25/16 which provided an update on the activity undertaken as part of the Clean Carlisle initiative.

The Neighbourhood Services Manager introduced the Neighbourhood Officer to the Panel and explained that as part of an internal review the Street Scene and Enforcement Team had been merged to bring together the previously separate functions. The Neighbourhood Officer came under the new Street Cleaning and Enforcement Manager and managed the day to day operations of the new team along with engaging with Ward Members and local communities to encourage them to take responsibility for their areas and make them proud of them. The Council hoped that local residents would take the lead on the condition of their local area with the continued help and enforcement from the Council.

The combined team had responsibility for: street cleansing; fly-tipping; dog-fouling; littering; Education / Awareness Raising; stray dogs and; car park enforcement. The street cleansing operatives had begun trialling an additional later shift pattern which increased the team's flexibility to respond to incidents which emerged later in the afternoon.

The Neighbourhood Services Manager showed the Panel slides of a successful project under the Neat Streets Initiative which focused on behaviour change in residents with the support of the Council. The Team were looking at how the Initiative could be expanded and enhanced further.

The Neighbourhood Services Manager reported a reduction in fly tipping and steps being taken to further reduce it and set out the Council's approach to enforcement and prosecutions. He reported that new signs had been installed in three key locations to highlight that fly tipping was a crime and to confirm that CCTV was in operation with evidence used to support prosecutions. The new signs had been very successful and only one complaint had been received since their installation in August. CCTV cameras were in use and more would be purchased.

In considering the report Members raised the following comments and questions:

 Had any consideration been given to working with people on Community Service to take on some of the work?

The Neighbourhood Services Manager responded that previous work had been done with the Probation Team but it had not been successful, however the new Street Cleaning and Enforcement Manager would look at this again.

Were the press informed when fly tipping prosecutions go ahead?

The Neighbourhood Services Manager confirmed that a press release was sent out if there was a conviction. He added that there would be a feature on fly tipping in the November edition of Carlisle Focus. This was to make householders aware of their duty of care when disposing of waste especially if they were employing someone else to dispose of it.

What was the protocol for the disposal of images from the CCTV cameras?

The Neighbourhood Services Manager assured the Panel that the CCTV footage was only viewed when fly tipping occurred. The images would be destroyed in line with the requirements of the Data Protection Act and the CCTV Policies.

 The hoarding at the Central Plaza had become unsightly and was covered in graffiti and fly posters, could this be addressed through the street cleaning team?

The Neighbourhood Services Manager confirmed that the team would investigate who was responsible for the hoarding and discuss the best way to address the issues raised with them.

The Panel asked for a progress update on the Litter Bin Review.

The Neighbourhood Services Manager reported that the recommendations from the Review had been implemented. Requests for additional bins had been made and each request was assessed and issued if there was a demand for it.

RESOLVED – 1) That the Update on Clean Carlisle (SD.25/16) be welcomed;

2) That the Neighbourhood Services Manager and his team be thanked for their excellent and dedicated work within Carlisle:

EEOSP.67/16 RETHINKING WASTE PROJECT

The Neighbourhood Services Manager presented report SD.24/16 which provided an update on the Rethinking Waste Project.

The Neighbourhood Services Manager reported on the improvements made to the Bousteads Grassing depot; details of the vehicle replacement programme and details of the new safety measures including cyclist protection on vehicles, features and technology which would improve operational safety and staff comfort.

Work continued on the development of new rounds and developing options to shape the new service. Information on the new rounds would be deployed when they were finalised. The next edition of Carlisle Focus would include information about the service and information encouraging more recycling over the Christmas period.

The Neighbourhood Services Manager drew attention to section 7 which set out recycling statistics and the improvements being made to increase household waste being recycled. There was a downward trend in recycling due to the reduction in packaging by manufacturers and the change in people's behaviour. He added that five new apprenticeship opportunities had been advertised but the response had been initially disappointing and the posts had been re-advertised.

In considering the update Members raised the following comments and questions:

 A Member asked what the Council's philosophy was with regards to recycling; did it want to meet the Government targets and not worry about increasing recycling or was it revenue led?

The Neighbourhood Services Manager explained that the Council's aim was to increase the number of households that recycled and to reduce the residual waste.

The Deputy Chief Executive added that the Rethinking Waste Project goals had been to find efficiencies in service; to make it as affordable as possible and to expand the rate of the service in keeping with the development of new houses.

Would the Council consider taking waste to facilities that burned it for fuel?

The Neighbourhood Services Manager explained that the Council was tied into a contract. A Member added that Hespin Wood produced fuel from waste and the County Council was involved in a profit share scheme which the City should monitor.

- Members felt that the apprenticeship opportunities on offer were excellent and were disappointed that there had not been a stronger response to advertisements.
- Did officers envisage a continuing role for the Cross Party Working Group?

The Neighbourhood Services Manager reported that the Rethinking Waste Project would come to an end after May 2017 when the project was fully implemented and all the work would become the day to day operational work of the team.

The Deputy Chief Executive suggested a final meeting of the Group closer to the end of the project to take stock of the project and to give consideration to the best way to engage and encourage people.

 Would there be a mechanism to keep the Panel updated with the progress of the team?

The Neighbourhood Services manager confirmed that the Panel would continue to monitor the delivery of the project and any changes in service.

RESOLVED – 1) That the update on the Rethinking Waste Project (SD.24/16) be noted;

2) That the Cross Party Working Group meet in February 2017 to discuss the best way to communicate the Project and services to the wider community;

3) That the Panel receives an annual update on the work being undertaken by Waste Services.

EEOSP.68/16 PUBLIC AND PRESS

RESOLVED – That in accordance with Section 100A(4) of the Local Government Act 1972 the Public and Press were excluded from the meeting during consideration of the following items of business on the grounds that they involved the likely disclosure of exempt information as defined in the paragraph number (as indicated in brackets against each minute) of Part 1 of Schedule 12A of the 1972 Local Government Act.

EEOSP.69/16 UPDATE ON CAR PARKING

(Public and Press excluded by virtue of Paragraph 3)

The Deputy Chief Executive presented reported SD.22/16 which gave an update on flood recovery measures and the implementation of the Car Park Development Plan.

The Deputy Chief Executive reported that there had been some internal changes to the structure of the car parking team and they had been moved under the remit of the Contracts and Community Services Manager which also covered the City Centre, sports and events.

The Deputy Chief Executive set out the background to the Car Park Development Plan and the impact the December 2015 flooding had on the Council's Car Parks. A number of car parks had been significantly affected by the flooding, the car park drains, gullies, lighting and surfaces had been inspected and a programme of works had been drawn up and costed. An analysis of the car parking income had been included as appendix A of the report.

The Car Park Development Plan had been updated since the panel had considered it in October 2015 and changes had been highlighted within the report.

The Panel discussed the report in some detail and sought clarification on the following:

Would there be any free Christmas Car Parking?

The Contracts and Community Services Manager confirmed that there would be free car parking in City Council car parks in the City Centre on each Thursday after 3pm when late night shopping was available.

Was the Council still considering the disposal of some car park assets?

The Deputy Chief Executive confirmed that the City Council was not considering the disposal of car park assets at the present time.

- In response to a question the Deputy Chief Executive clarified what the car park reserve fund was and where the resources came from.
- The Panel asked to see the criteria / discount scheme for businesses and large employers when it was available.

Was it possible to build in flood resilience in the car parks?

The Deputy Chief Executive reiterated the work that had been undertaken in the car parks following the flooding, adding that it was difficult to make the lighting resilient due to the availability of lighting columns and the ticket machines could not be made resilient due to the height of the flood water. The surfaces and the drainage had coped very well with the flood and only required minor repairs

 Had any consideration been given to establishing a park and ride scheme during large events in the City such as the fire show?

The Contracts and Community Services Manager responded that previous events had not required a park and ride scheme and he was not aware of any issues with parking or the dispersal of traffic after events that would require a scheme. He added that the position would, however, be closely monitored.

RESOLVED – 1) That the Update on Car Parking (SD.22/16) be welcomed;

- 2) That a further update report be submitted to the Panel in April 2017 which included performance data for the full year to enable the Panel to reach a decision on the frequency of monitoring reports in the future;
- 3) That the criteria / discount scheme for businesses and large employers for the use of City Council car parks be submitted to the Panel when it was available.

(The meeting ended at 12.35pm)



Environment & Economy Overview and Scrutiny Panel

Agenda Item:

A.2

Meeting Date: 1 December 2016

Portfolio: Cross Cutting

Key Decision: No

Within Policy and Budget Framework

Public / Private Public

Title: OVERVIEW REPORT AND WORK PROGRAMME

Report of: Policy & Communications Manager

Report Number: OS.24/16

Summary:

This report provides an overview of matters related to the Environment and EconomyO&SPanel's work. It also includes the latest version of the work programme.

Recommendations:

Members are asked to:

- Note the item (within Panel remit) on the most recent Notice of Key Executive Decisions
- Note and/or amend the Panel's work programme
- Note that a performance data quality check has been carried out.

Contact Officer: Steven O'Keeffe Ext: 7258

Appendix attached to

report:

1. Environment & Economy O&S Panel Work Programme 2016/17

1. Notice of Key Executive Decisions

The most recent Notice of Key Executive Decisions was published on 21 October 2016. This was circulated to all Members. The following items fall into the remit of this Panel:

Items which have been included in the Panel's Work Programme

KD.15/16 North West Coast Connections Project S42 Consultation Response

This item is on the agenda

KD.21/16 Budget Process 2017/18

This item is on the agenda

KD.27/16 Public Realm / Green Market

KD.25/16 Discretionary Rate Relief - Large Empty Hard to Let Premises

Items which have not been included in the Panel's Work Programme
None

2. References from the Executive

None

3. Work Programme

The Panel's current work programme is attached at Appendix 1. Members are asked to note and/or amend the Panel's work programme and in particular consider the framework for the next meeting.

The following items are scheduled for the next meeting on 19 January 2017:

- Local Enterprise Partnership
- Business Support Task and Finish Group
- Tourist Information Centre
- Tourism Draft Plan

4. Performance Data Quality

Members of the Panel will be aware that inaccurate data was provided for recycling performance in the last (Quarter 1) Performance Monitoring report. The Quarter 1 figure for 2015/16 overall recycling figure quoted was reported inaccurately high. The inaccuracy prompted a data quality check on the data relating to the service standard and this was carried out in October 2016. The check was reviewed and its findings accepted by SMT at their meeting on 8 November 2016.

The check revealed that the inaccuracy reported to the Panel related to a communication misunderstanding and not a miscalculation. It further revealed that the end of year (2015/16) figure was unaffected by this confusion and was therefore reported accurately.

Recommendations arising from the check were:

- Policy and Performance Officers to give greater scrutiny to recycling figures in light of this data quality check and the changes that will take place over the next few months.
- The Neighbourhood Services Technical Team to create a Performance sheet which links from the main waste and recycling data spreadsheet to simply include relevant data with appropriate context.
- Performance Reports to be shared with Waste Services Manager as well as Deputy Chief Executive prior to publication.
- Review data input again once the corporate performance management system,
 Power BI, is developed and introduced.
- Policy and Communications Team to carry out occasional spot checks on weighbridge tickets.

Note: in compliance with section 100d of the Local Government (Access to Information) Act 1985 the report has been prepared in part from the following papers: None

рарогог попо	-	Туре	of Sci	utiny	•				M		D			
ISSUE Contact Officer	Performance Management	Key decision Item/Referred from Executive	Policy Review/Development	Scrutiny of Partnership/ External Agency	Monitoring	Comments/status	30 Jun 16	28 Jul 16	15 Sep 16	27 Oct 16	1 Dec 16	19 Jan 17	2 Mar 17	20 Apr 17
				CUF	RREN	T MEETING – 1 December 2016								
Budget Alison Taylor		√	✓			To consider budget proposals for 2016/17					\checkmark			
Flood Update Report Darren Crossley				✓	✓	01 Dec: Environment Agency / County Council update Future report on options for Civic Centre basement and ground floor and details of the Flood Ready Plan	✓	✓	✓		✓			
Performance Monitoring Reports Gary Oliver	✓					Monitoring of performance relevant to the remit of Panel	✓		✓		✓		✓	

		Туре	of Sci	utiny					NA		~ D			
ISSUE Contact Officer	Performance Management	Key decision Item/Referred from Executive	Policy Review/Development	Scrutiny of Partnership/ External Agency	Monitoring	Comments/status	30 Jun 16	28 Jul 16	15 Sep 16	27 Oct	1 Dec	19 Jan	2 Mar 17	20 Apr 17
NW Coast Connections Project Jane Meek						Consultation on detailed proposal.					✓			
					T	ASK AND FINISH GROUPS								
	ī	ī	ı	1		FUTURE ITEMS	1	ı	1	1	ı	ı	ı	
Local Enterprise Partnership Jane Meek				✓		Focus on skills development and update on Growth 3 bid (Graham Haywood – LEP)						✓		

		Туре	of Sci	rutiny	1				N/A	ootin	ıg Da	atoc		
Issue Contact Officer	Performance Management	Key decision Item/Referred from Executive	Policy Review/Development	Scrutiny of Partnership/ External Agency	Monitoring	Comments/status	30 Jun 16	28 Jul 16	15 Sep 16	27 Oct 16	1 Dec 16	19 Jan 17	2 Mar 17	20 Apr 17
Local Development Scheme Jane Meek						Programme for preparing planning policies over the next three years (including Community Infrastructure Levy)							✓	
Business Support Task and Finish Group Garry Legg						Review progress of recommendations made by the T&F group						✓		
Business Plan development for Carlisle Parks Phil Gray	√					Progress of Talkin Tarn Business Plan and emerging Business Plan development of other Parks (Bitts Park and Hammonds Pond)			✓				✓	
Performance Monitoring Reports Gary Oliver	✓					Monitoring of performance relevant to the remit of Panel	✓		✓		✓		✓	
Tourist Information Centre Gavin Capstick					✓	Update on business plan development and performance monitoring of the TIC						✓		

		Type	of Sci	rutiny					N/A	aatin	a Da	atoc		
Issue Contact Officer	Performance Management	Key decision Item/Referred from Executive	Policy Review/Development	Scrutiny of Partnership/ External Agency	Monitoring	Comments/status	30 Jun 16	28 Jul 16	15 Sep 16	27 Oct 16	1 Dec	19 Jan 17	2 Mar 17	20 Apr 17
Tourism Draft Plan						Development of strategic plan to						√		
Jane Meek						promote tourism							 	
Nuclear New Builds Jane Meek														
Carlisle South Masterplan Garry Legg														✓
Economic Strategy Jane Meek													✓	
Update on Public Realm Improvement Projects Mark Walshe					√	Update to include new signage, Green Market and the Bandstand				✓				?
Update on Clean Carlisle Colin Bowley	√				√	6 monthly update				✓				✓
Car Parking Gavin Capstick			✓			Update on Car Parking (income vs target income, flood recovery and new ticket machines, and proposed changes/developments)				✓			?	

		Туре	of Sci	rutiny	,				NA.		~ D			
ISSUE Contact Officer	Performance Management	Key decision Item/Referred from Executive	Policy Review/Development	Scrutiny of Partnership/ External Agency	Monitoring	Comments/status	30 Jun 16	28 Jul 16	15 Sep 16	27 Oct	1 Dec	19 Jan	2 Mar 1 <i>7</i>	20 Apr 17
Rethinking Waste Project Colin Bowley					✓	Update on project progress		✓		✓			✓	
	1	I	1		T	COMPLETED ITEMS		I	T	T	I	1		
Discretionary Rate Relief Policy Peter Mason		✓				Consultation regarding discretionary rate relief for difficult to let commercial properties	✓							
Local Enforcement Plan Chris Hardman		✓				To consider the updated Local Enforcement Plan		✓						

				utiny					Me	etin	ıg Da	ates		
Issue Contact Officer	Performance Management	Key decision Item/Referred from Executive	Policy Review/Development	ny of nal Ag	Monitoring	Comments/status	30 Jun 16	28 Jul 16	15 Sep 16	27 Oct 16	1 Dec 16	19 Jan 17	2 Mar 17	20 Apr 17
Local Plan Jane Meek						Adoption of the Local Plan, and programme for preparing planning policies over the next three years.			✓					

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Report to Environment & Economy Overview and Scrutiny Panel

Agenda Item:

A.4

Meeting Date: 1st December 2016

Portfolio: Cross Cutting

Key Decision: No

Within Policy and

Budget Framework No
Public / Private Public

Title: FLOOD UPDATE REPORT

Report of: Deputy Chief Executive - Darren Crossley

Report Number: SD.31/16

Purpose / Summary:

This report is part of a series of regular update reports prepared for Overview and Scrutiny Committees on flood recovery activities and future programmed work.

This report will:-

- Update Members on the recovery of Council assets, including the Civic Centre
- Update Members on the provision of grants and relief to those households and businesses directly affected by the flood.
- Update Members on the activities being undertaken by the Environment Agency and Cumbria County Council.
- Provide details of the Carlisle Flood Response Plan

Recommendations:

That member of the Environment and Economy Overview and Scrutiny Committee
Panel consider this report and the progress made to date in the continued efforts to
reinstate a range of Council assets.

Tracking

Executive:	
Overview and Scrutiny:	1 st December 2016
Council:	

1. BACKGROUND:

- 1.1 This report aims to set out an update of the recent and future planned work associated with recovery from the 2015 flood and plans to deal with any future such events.
- 1.2 During the past eleven months an extensive range of recovery activities have been undertaken, these work areas are outlined in the report and officers will be present to answer questions associated with these.

2. CITY COUNCIL ASSET RECOVERY PROGRAMME

2.1 As outlined in previous reports Phase 2 of the Asset Reinstatement programme is now well underway. The Council has employed WYG as programme managers. WYG are to design, specify and deliver the reinstatement works to all scheduled properties, including the procurement process and management of the construction works. A number of controls are in place to ensure effective delivery of the programme to budget, quality and time. A plan is in place for effective communication of progress and for early identification of any issues and emerging risks. During the detailed design stages, consultation and sign-off procedures will be scheduled to ensure the relevant stakeholders are involved in the process.

This programme includes all the flood damaged properties owned by the City Council. The target start and end dates for individual assets/recoveryhave been updated and are shown below:

Warwick St properties	06/2016 - 12/2016
Adriano's	06/2016 - 02/2017
Sands Centre and Swifts	07/2016 - 01/2017
Stoney Holme (inc. Depot)	10/2016 - 04/2017
John St properties (Hostel and Annex)	06/2016 - 03/2017
Shaddongate Resource Centre	06/2016 - 03/2017
Botcherby Community Centre	06/2016 - 02/2017

Bitts Park (Depot, Lodge, Pavilion WCs)

Dates to be confirmed await

design/costings

Caldew Riverside Properties (demolition) 06/2016 - 03/2017

Old Fire Station Complete

Sheepmount 10/2016 – 04/2017

Funding for the recovery of these assets is the subject of ongoing work with our insurers.

2.2 Civic Centre and Customer Contact Centre

As reported previously, Customer Contact services continue to be provided from the temporary portababin accommodation located in the car park as the ground floor and basement remain out of action. Work has commenced on investigating options for

the future use of the Civic Centre and Customer Contact Centre. This exercise includes investigations into:

- Accommodation requirements having regard to current and future staffing, service delivery needs and working practices;
- The current costs of occupying, running and maintaining the Civic and comparison with the costs of relocation;
- The scope and demand in the marketplace for alternative uses for the ground floor, basement and any surplus office space in the tower from both the public and private sector, and the income generating potential which might arise;
- Any building and engineering constraints and opportunities, together with associated costs, which need to be taken into account if alternative uses are considered:
- Practical and cost efficient flood resilience measures which can be built into the reinstatement;
- The insurance monies available to fund the cost of reinstatement.

WYG have been appointed (via the same framework agreement as our other recovery projects) to assist the Council through this work. Officers have now met with architects and quantity surveyors on site and ground floor proposals are now being developed for consideration in December.

2.3 Bitts Park

The upper tennis courts have been open to the public since Easter. Permanent repair works to the fencing and floodlighting for these courts is now complete.

The lower courts remain out of action, however they were due to be resurfaced and redeveloped as part of the proposed canopy development. On that basis we have not progressed repair works as they will be unnecessary as and when the canopy project commences. We are currently awaiting the release of funds from the LTA (Lawn Tennis Association).

The Pavillionwas insured and will form part of the Council's reinstatement programme, however we are still working alongside WYG to form a view on the best provision and layout of facilities in the park (taking account of future needs and the insurance settlements and functions of the Pavillion, Park Keeper's Lodge and Bitts Park Depot).

The play area has now benefitted from a complete array of new equipment, designed to be fully accessible. This facility was re-opened in October and is proving to be very popular

2.4 The Sheepmount

The Athletics facilities have reopened in a limited and controlled manner. They have limited ancillary facilities at this stage (a small portacabin and portaloo). The track and some field facilities are back open for club training.

Temporary changing rooms are operational for football season and repair works to the pitches and turf have been completed.

We now have a recovery project underway and are liaising closely with our operator (GLL) and user groups/clubs. In addition temporary car park arrangements are in place to ensure access to the site for users.

3. FLOOD GRANTS &HOUSEHOLD PAYMENTS (FIGURES AS OF 11thNOVEMBER 2016)

3.1 Community Support Grant -£500 Household Scheme

Further to the floods the Government announced an immediate assistance scheme targeted to support households affected by the event. This offered a one off Community Support Grant payment of £500 to each household.

Up to 11th November 1,670 households have been confirmed as flooded by Storm Desmond, of these 1,602 are eligible for the £500 community support grant. The Council has made payments made to 1,567 households equating to 97.84% and totalling £783,500.

This is being recovered from the County Council upon submission of fortnightly grant claims.

3.2 £5,000 Flood Resilience Grant

Flood resilience grants are available to assist householders and business to make their properties more flood resilient in future. The grants can be used to cover costs associated with resistance products such as flood doors and barriers or they can be used to make properties more resilient, so water proof plaster, moving electric, boilers etc. above the flood water. Since the introduction of the scheme, the Housing team have provided advice to over 1000 flood affected property owners, through online enquires, telephone, advice sessions. The scheme has also been widely publicised through partner agencies, local press and social media.

The Council are also now working in partnership with JBA consulting, who are able to provide independent Property Protection reports. The report costs are covered by the £500 allowance within the grant and the Council are arranging payment on behalf of the owner through the process, so there are no upfront costs for the property owner. The report will be invaluable for those who require advice on what measures might be best to future protect their properties. The Council are also working in partnership with BERG (see para 4.1) and Newground (EA supported organisation providing resilience in the communities).

The Flood Resilience grant covers both residential and commercial properties and is being administered by the Housing Department. 714 applications (43%) have been received, 642 approved and payments made to 329 households (as of 11th October) totalling £1,315,920. The 714 applications equate to approx. £2,253,430. This is recoverable from the County Council.

3.3 Council Tax & NNDR discount schemes

County wide schemes have now been approved with the DCLG paying £400,000 to the County Council to fund the local discretions (second homes / empty properties / flood affected businesses) contained within the County wide schemes.

Districts are submitting monthly claims to recover the costs incurred. Funding for discounts offered in line with the Government Scheme will be paid through a S31 grant directly to us. Council tax discount awarded to 2,177 householders which amounts to £2.164 million for the affected properties. Business rates discount awarded to 107 properties amounting to £506,409 in total.

The total number of businesses affected was 203, with 129 properties now being reoccupied.

4. BUSINESS EMERGENCY RESILIENCE GROUP (BERG)

4.1 An initiative of His Royal Highness The Prince of Wales, the Business Emergency Resilience Group helps businesses and communities across the UK to prepare for, respond to and recover from emergencies such as flooding, cyber-attacks and civil unrest. BERG has been imbedded within the Council Contact Centre since July 2016 and helps small to medium-sized business' and residents within the process of applying for Flood Resilience Grants.

5. ONGOING WORK OF THE ORGANISATIONS INVOLVED IN THE FLOOD RECOVERY

5.1 Carlisle City Council

The Carlisle Emergency Plan has been reviewed and signed off by the Senior Management Team on 30th August. The plan is now stored on the Resilience Direct system, a national extranet for Emergency Planning

Additional locations for Reception Centres are being identified with feedback from communities at risk from flooding. A risk assessment for each location will be carried out and once an agreement has been reached with the centre's owners and operators they will be added the Carlisle Emergency Plan and the Cumbria Resilience Forum Welfare Plan (Emergency Assistance Centres).

The Council's own actions in the draft Carlisle Flood Response Plan (See para 7.0) have now been shared with local Community Flood Action Groups for feedback. Meetings have taken place to discuss the draft plan with members of the community from Warwick Bridge, Stockdalewath and Crosby on Eden.

5.2 Cumbria Resilience Forum

The Cumbria Resilience Forum (CRF) consists of all organisations and agencies involved with emergency response in Cumbrian communities. The CRF was set up in response to the Civil Contingencies Act 2004 to co-ordinate the response to major incidents in Cumbria.

The Community Resilience Network is a sub-group of the CRF which focuses on improving community resilience. This group will be the an important link to a new Big Lottery Funded project called 'Rebuilding Together'. This new programme will take place over the next 3 years, led by Cumbria CVS and delivered in partnership with Cumbria Action for Sustainability (CAfS) and Action with Communities in Cumbria (ACT). 'Rebuilding Together' will help to build on the partnerships we already have, and support local communities and organisations to increase their resilience and confidence to respond alongside statutory organisations.

CRF have commissioned a debrief report on the ongoing recovery. This is a separate debrief to the CRF Storm Desmond Report, which focused on the immediate acute phase of the emergency. The recovery debrief work is been led by an Hugh Deeming, an independent consultant.

6. UPDATE FROM PARTNERS – ENVIRONMENT AGENCY AND CUMBRIA COUNTY COUNCIL

- 6.1 Representatives from these two organisations are invited to the Scrutiny meeting and will present an update of their work to Committee.
- 6.2 The Carlisle Flood Response Plan 2016/17 which is being drawn up in partnership with the Environment Agency and the County Council. It is a working document which will be used by partners to direct actions/activity to reduce the flood risk and improve community resilience across the Carlisle City Council area. With regard the City Council actions this includes the following
 - A planned programme of checking and maintaining water courses we are responsible for
 - A Floor Response Team
 - Recovery Communication Strategy
 - · Guidance to communities

The plan is being finalised and we anticipate being able to share the main points at the meeting.

Contact Officer: Darren Crossley Ext: Ext. 7003

Appendices
attached to report:

Note: in compliance with section 100d of the Local Government (Access to Information) Act 1985 the report has been prepared in part from the following papers:• None

CORPORATE IMPLICATIONS/RISKS:

Chief Executive's –

Deputy Chief Executive –

Economic Development –

Governance –

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Environment and Economy Overview and Scrutiny Panel

Agenda Item:

A.5

Meeting Date: 1 December 2016

Portfolio: Economy, Enterprise and Housing

Key Decision: Yes: Recorded in the Notice Ref:KD.15/16

Within Policy and

Budget Framework NO
Public / Private Public

Title: NORTH WEST COAST CONNECTIONS PROJECT -

S42 CONSULTATION RESPONSE

Report of: Corporate Director of Economic Development

Report Number: ED.42/16

Purpose / Summary:

The report sets out the issues for consideration relating to the National Grid's consultation on the North West Coast Connections project including a draft headline report on the consultation response attached in Appendix 1.

Recommendations:

That the Panel considers this report and the Headlines Issues contained in Appendix 1, and refers their observations to Executive as the basis of the Council's response to National Grid's formal consultation on the North West Coast Connections Project.

Tracking

Executive:	19 December 2016
Overview and Scrutiny:	1 December 2016
Council:	

1. BACKGROUND

- 1.1 National Grid plans to build a 400 kilovolt (kV) connection from the proposed Moorside Power Station in West Cumbria to the national electricity grid at Harker, near Carlisle and Heysham, near Lancaster. This project 'North West Coast Connections' is a nationally significant infrastructure project (NSIP), which will be decided by the Secretary of State through the Development Consent Order (DCO) process.
- 1.2 National Grid is carrying out a public consultation on the North West Coast Connections (NWCC) project from 28th October 2016 to 6th January 2017. This is a formal stage of consultation under Section 42 of the Planning Act 2008 with the public and local authorities, and is the main opportunity to comment on this project before a DCO application is submitted to the Planning Inspectorate, currently scheduled for April 2017.
- 1.3 Members of the Executive previously received report ED.24/12, which related to the consultation on the Strategic Options at its meeting on 2nd July 2012, and report ED. 47/14 on the Routeing Corridor Study and Outline Siting Studies for Associated Infrastructure on the 10th November 2014. On the latter consultation, Members resolved to agree that the emerging preferred route (C2.8) was appropriate, and that detailed routing needs to fully assess impacts and understand the mitigation in relation to: rationalisation of lines (2 instead of one); careful technology choice; maximising economic benefits using local workforce, using local manufacturers, economic impact assessment; transport plans/construction management; continued involvement in the project.
- 1.4 Carlisle City Council has been involved in the evolution of the project through a Planning Performance Agreement to help steer the project and identify any issues which need to be considered prior to an application being made. This involvement does not prejudice the way the Council should respond to any consultation nor does it prejudice the Council's involvement in later, formal stages of the project, when the council deals directly with the Planning Inspectorate
- 1.5 Carlisle City Council is a statutory consultee and this report sets out a proposed response for consideration by Overview and Scrutiny Panel prior to consideration by Executive on the 19th December.

2. PROPOSALS

- 2.1 National Grid plans to build a 400 kilovolt (kV) connection from the proposed Moorside Power Station to the national electricity grid at Harker, near Carlisle and Heysham, near Lancaster. This project will only be implemented if the new nuclear power station at Moorside goes ahead.
- 2.2 The proposed project (the subject of consultation) includes the following principle elements:

- Construction of 400kV transmission connections totalling approximately 163km from Harker to Heysham. This connection comprises overhead lines, underground cables and the use of tunnelling technology;
- Construction of new 400kV substations at Stainburn and Roosecote and extensions to the existing 400kV substations at Harker and Middleton;
- Relocation of existing 400kV overhead line west of Harker;
- Construction of a tunnel beneath Morecambe Bay between tunnel head houses at Roosecote and Middleton (Heysham);
- Modifications to existing 132kV distribution infrastructure and removal of certain existing 132kV overhead lines;
- Works to modify the existing Electricity North West Limited (ENW) 132kV and lower voltage network where necessary to allow construction of the 400kV connections;
- Modifications to the railway network to provide access to temporary rail sidings in certain locations;
- Areas of mitigation, restoration and/or reinstatement; and
- Associated works, for example, temporary access roads, highways works, temporary compounds (rail, helicopter and general construction) two temporary shafts, work sites and ancillary works.
- 2.3 The area of the consultation is divided up into two parts in order to better help consultees understand the areas that affect them North (Moorside to Harker near Carlisle) and South (Moorside to Middleton near Heysham in Lancashire). National Grid has further divided these two parts into geographic sections for ease of reference. The Northern connection is divided as follows:
 - A1: Moorside to Thornhill
 - A2: Thornhill to Whitehaven
 - B1: Whitehaven to Seaton
 - B2: Seaton to Tallentire
 - B3: Tallentire to Aspatria
 - C1: Aspatria to Wigton
 - C2: Wigton to Harker (part 1 of 2)
 - C2: Wigton to Harker (part 2 of 2)
- 2.4 The Southern connection is divided as follows:
 - D1: Moorside to Waberthwaite
 - D2: Waberthwaite to Silecroft
 - E1: Silecroft to Arnaby
 - E2: Arnaby to Lindal-in-Furness
 - H1: Lindal-in-Furness to Morecambe Bay
 - H2: Morecambe Bay
 - H3: Morecambe Bay to Middleton (Lancashire)
- 2.5 Other proposed works are also proposed at Natland Substation near Kendal.

- 2.6 The areas within the Northern connection affecting Carlisle district are: C2 (Wigton to Harker (part 2 of 2) only. The Draft Order Limits (DOL) for the North route commence at Moorside and ends at the existing 400kV Harker Substation, approximately 5.5km north of Carlisle city centre. The 400kV connection would follow a complete route approximately 81km long. The principal settlements in proximity to the North Route of the DOL are the western and northern urban edge of Carlisle, Great Orton, Cargo and Rockcliffe.
- 2.7 To put the size of the pylons into context with existing 132kV pylons, double circuit pylons and low height double circuit pylons are the two main 400kV designs of pylon for the Project. The 400kV standard lattice pylon is 46.5m high with an approximate arm width of 18.2m. The 400kV low height lattice pylon is 35.3m high with an approximate arm width of 30m. This contrasts with a 132kV standard lattice tower whose height is 26.1m and approximate arm width of 8.4m. A 33kV standard lattice tower height is 18.5m with an approximate arm width of 5.3m.
- 2.8 In terms of other proposed structures, a typical Cable Seal End (CSE) compound would occupy a footprint of up to 100m x 50m for a 400kV double circuit compound with equipment (excluding pylons and gantries) of up to 12m in height. A small control building approximately 4m wide and 3m long would be required in each compound. Each compound would be surrounded by 2.4m high palisade fence, with an electrified fence attached inside up to 1.6m above, to provide protection to the public and the equipment.
- 2.9 132kV overhead lines on lattice pylons or trident wood pole and 33kV overhead lines on lattice pylons connecting to a section of underground cable would commence and terminate at a cable sealing end platform (CSEP) structure. These would comprise a steel platform and steel cable 'ladder' structure. A typical single circuit 132kV CSEP is 7.5m wide and 5m deep and is supported by three vertical steel supports concreted into the ground.
- 2.10 The documents comprising National Grid's consultation can be viewed on National Grid's web site www.northwestcoastconnections.com. Members have been provided with the generic consultation material which is supported by a number of technical reports and drawings/plans.
- 2.11 As an NSIP, the NWCC project needs approval from the Secretary of State through the DCO process. A DCO is a composite consent that avoids the requirement for several different consents for a single project. It can include planning permission, the compulsory acquisition of land and interests in land, the stopping up of highways and highways works. The DCO application is submitted to the Planning Inspectorate (PINS) for determination.
- 2.12 As part of the S.42 consultation, the applicants have provided what is known as a Preliminary Environmental Information (PEI) report, which sets out the likely environmental effects of the development at this stage. The PEI is the precursor to a full Environmental Statement that will be submitted with the DCO.

- 2.13 Carlisle City Council is a statutory consultee in the DCO process and is classified as a 'host authority'. The Council's role as part of the current consultation is to:
 - ensure that the developer provides and responds to evidence on likely impacts;
 - develop solutions for how the impacts can be avoided or mitigated;
 - maximise benefits for the local community;
 - consider the prospective detailed terms of any DCO, including requirements (planning conditions) and legal obligations.
- 2.14 The Council (jointly with the other Cumbrian Authorities affected by project, together with Lancashire County Council and Lancaster City Council) has entered into a Planning Performance Agreement (PPA) with National Grid to enable it to engage in a positive way and to reach an informed view on the impacts of the proposal. Consultants WYG are supporting the work of this PPA Group. WYG is preparing the technical consultation response to National Grid's formal consultation on behalf of the PPA Group.
- 2.15 Following submission of the DCO, PINS will have 28 days in which to confirm their acceptance of the application. Within this period, the Council will have 14 days to submit comments on the Adequacy of Consultation. Once the application has been accepted, the Council will be asked to submit relevant representations within the next 28 days. To inform the Examination, the Council will also be invited to submit a Local Impact Report (LIR) and Statement of Common Ground. The LIR sets out the Council's view on how the project will affect the local area and effectively forms the evidence base against which the case will be assessed by PINS for mitigation and or legacy measures sought by the Council. The Council will also submit written representations to the Examining Authority and participate in oral Examination hearings, when invited to do so. The LIR will be approved by Executive prior to submission to PINS.
- 2.16 The expected timetable for the project is as follows:

DCO application submitted April 2017

Prepare Local Impact Report
 Examination
 Summer/Autumn 2017
 Nov 2017 to April 2018

Consent (if secured)ConstructionOctober 20182019 onwards

• Operation begins 2024

2.17 The Council has worked with the PPA Group authorities to prepare a joint response to the current S.42 consultation (including the PEI report) highlighting the key issues. Appendix 1 provides a summary response setting out the issues of key concern to the Group. The more detailed PPA Group response will be submitted jointly with the support of all the PPA authorities.

Key Issues arising from the S.42 Consultation/PEI report relevant to Carlisle City Council

- 2.18 The key concerns arising from the current S.42 consultation affecting Carlisle are focused on the following topic areas;
 - Landscape and Visual Impact;
 - Historic Environment;
 - Ecology;
 - Socio Economics, Recreation and Land Use;
 - Construction and Operational Noise & Vibration;
 - Air Quality
 - Hydrology and Flood Risk
 - Traffic and Transport;
 - · Lack of Information and Timescales; and
 - · Community Benefits.
- 2.19 The following sections consider each of the key topic areas in turn together with appropriate recommendations relating to those areas.

Landscape & Visual Impact

- 2.20 General concern is raised about the significant impact of the overhead line directly and cumulatively on the landscapes across Cumbria. The proposal incorporates substantial mitigation measures, which are acknowledged including; the deployment of 23.4km (14.5 miles) of new underground cable and removal of the ENW 132kV line through the western section of the Lake District National Park (LDNP), a tunnel beneath Morecambe Bay, to avoid the southern section of the LDNP and a reduction in the extent of existing ENW 132kV lines in the area around the Hadrian's Wall World Heritage Site.
- 2.21 More locally within Carlisle district between Wigton and Harker (Subsection C2), National Grid is proposing to remove the existing south/eastern ENW 132kV line (closest to Thursby and Baldwinholme) to just south of the roundabout where the A689 meets the B5307, as well as a section of the northern/western existing line where it passes Little Orton; removal of the existing 132kV lines as far as the River Eden and place one underground; remove the western existing 132kV line north of the River Eden. All of these proposals would mean taking down 70 132kV pylons in this subsection, and these mitigation measures are broadly welcomed. In addition, National Grid would remove 20 existing ENW 33kV pylons south east of Great Orton and Little Orton.
- 2.22 In terms of replacement pylons and line, National Grid would build a 400kV pylon line to be carried by 38 steel lattice pylons (of which 32 would be new) following the route of the existing ENW 132kV pylon lines running north east from north of Woodhouses towards Belle Vue in Carlisle, and then north towards Rockcliffe and would connect into an extended 400kV substation near Harker. National Grid proposes to plant native trees to the east of the properties at Rockcliffe to help screen the 400kV connection.

- 2.23 The existing 400kV substation at Harker would be extended so that the new transmission line would join the national transmission system. The existing road would be diverted around the extension, and native trees would be planted to the north east and west of the proposed 400kV substation extension to help screen it. Two short sections of the existing National Grid and ENW 132kV lines that run north from Harker substation would be placed underground to make space for the substation, and there would be a cable sealing end platform (CSEP) at one end. One new 400kV pylon would be built to the east of the existing 400kV substation at Harker to divert the existing National Grid 400kV pylon line that connects into Harker substation from the east so it connects to the new substation extension
- 2.24 National Grid are proposing to underground almost 700m of the northern/western existing 132kV pylon line closest to Little Orton, and would build a CSEP at either end. A short section of 132kV cable would be undergrounded south of the roundabout where the A689 meets the B5307. Approximately 2.3km of existing 132kV pylon line would be placed underground from just north of the A689 where it meets the B5307 under Hadrian's Wall and the Vallum to the River Eden. National Grid would use a technique to drill under the feature rather than digging a trench but they would need to build a CSEP at either end. This would reduce the number of pylons crossing the Frontiers of the Roman Empire World Heritage Site.
- 2.25 There would be less than 1km of new 132kV pylon line to the west of Cargo, and would connect to the existing 132kV pylon nearest to Cargo to the proposed 2.3km underground cable under Hadrian's Wall. A short section of the existing 132kV line closest to Rockcliffe would be undergrounded where it would cross the 400kV connection. A CSEP would be built at either end. Just less than 1km of new 132kV pylon line south of Rockcliffe would be built to divert a section of the existing National Grid 132kV pylon line and connect it to the short section of underground cable.
- 2.26 There would be site compounds located at: Kingmoor Park Heathlands Estate (site 1), Kingmoor Park Heathlands Estate (site 2) plus a site compound at Harker Substation extension. There would be use of a rail compound at Kingmoor Depot (off Queen's Drive), plus helicopter operating bases near Rockcliffe and at Cargo. Highway works include the construction of new bellmouths at public highway boundaries and the construction of new and resurfaced access tracks.
- 2.27 In terms of the landscape and visual impacts within the Wigton to Harker subsection (C2) affecting Carlisle district, the Solway Coast AONB extends along much of the northern edge of this subsection, and whilst the separation distance between the proposed route and the AONB is generally extensive through the southern and central sectors of the subsection, it extends to within 300m of the route near Rockcliffe, to the north west of Carlisle. As such, predicted effects on the AONB range from Minor to Moderate depending on separation distance.
- 2.28 From east of Wigton, the route extends through an undulating agricultural landscape between Thornby and Great Orton with a small-scale field pattern dissected by hedgerows, tree belts and areas of woodland. Whilst these features often combine to reduce the perception and extent of pylons/overhead line visible,

the scale of the larger 400kV pylons could potentially be significant in this small-scale landscape. It is also noted that the route will extend in proximity to the Watchtree Nature Reserve and Orton Moss SSSI.

- 2.29 Between Little Orton and Cornhill Farm (near the B5307 / A689 roundabout junction), views are generally influenced by the settlement edge of Carlisle, the A689 road corridor, and the existing overhead lines and pylons which extend around the settlement edge. These features often combine to create a more urban context to views and as such, the new 400kV pylons may not appear as prominently in the landscape. This effect will be potentially offset by the larger number of people who will experience views. The proposed route extends to the north west of the existing 132kV line and the pylons will potentially appear more significantly in views from Little Orton and the landscape around Priorwood and Priory Nook.
- 2.30 To the north of Cornhill Farm and the B5307, the route extends across the course of Hadrian's Wall and the Hadrian's Wall Path (long distance path). Whilst it is noted there are already undergrounding proposals for the 132kV line at this location as described above, it is suggested that there is an opportunity to further reduce landscape and visual effects on this important landscape and heritage feature with additional undergrounding of the route at this location. To the north of the River Eden crossing, the route passes in proximity to the edge of the AONB (see above) and the settlements of Cargo and Rockcliffe. Views from these locations are anticipated to be significantly affected by the introduction of larger 400kV pylons.
- 2.31 National Grid has adopted a one-up-one-down principle in relation to the two existing ENW 132kV OHL running between Workington and Carlisle, with a number of other areas where additional lines are removed or transferred underground. Whilst all the mitigation measures outlined above are broadly welcomed, the benefit of the one-up-one-down approach would, to a degree, be offset by the landscape and visual impact of the taller and more bulky form of the 400kV pylons. It is considered by Officers that a pragmatic solution is necessary requiring additional rationalisation than is currently proposed by National Grid, which although they acknowledge would be technically feasible but so far has been dismissed on grounds of cost. The Council would argue that further rationalisation should include the undergrounding of both 132kV lines to address the adverse impacts on the 400kV lines on the landscape set out in this report and the Council's detailed response.
- 2.32 An important issue is the consideration of the effects of the proposed National Grid pylons upon 'valued landscapes' within the rural part of Carlisle. The National Planning Policy Framework (NPPF) states that the planning system should contribute to, and enhance, the natural and local environment by protecting and enhancing valued landscapes where they are not nationally designated. The NPPF does not define what valued landscapes might be. However, recent planning appeal decisions and legal judgements would suggest that the sum of the landscape quality, scenic quality, representativeness and recreational value of a site may set it apart from mere countryside (Stroud District Council v SoS CLG and Gladman Developments Limited [2015] EWHC 488 (Admin)). National Grid must therefore submit evidence to demonstrate that they have considered and assessed whether

there are likely to be any affects on valued landscapes in the rural parts of Carlisle District affected by the development, given the proximity of the Solway Coast AONB, and that landscape character sub-types do not stop at a defined designation boundaries but instead merge across them.

2.33 In addition, there remains concern over National Grid's methodology for considering alternative technology across the whole length of the route, which is based on the notion that alternative technologies are only required where there would be 'particularly significant' effects. The use of 'particularly significant' in National Grid's 'Options Appraisal of Alternative Technologies' methodology has set an artificially high bar for the establishment of 'Focus Areas' where they have identified for specific mitigation. Their methodology is not in accordance with current guidance, and is in conflict with National Grid's 'Response to Consultee Feedback to Assessment of Mitigation Options Methodology' (February 2016), which states that mitigation will be considered for the entire length of the route. In this regard, there is concern that whilst 'significant' effects would be measured in the EIA, it is not clear as to why areas within the rural parts of Carlisle have not been considered for appropriate mitigation, where there are significant effects in a way that is both robust and accountable

Cumulative landscape and visual impacts

- 2.31 The cumulative impact of existing vertical infrastructures, which are sequentially visible in the landscape, and which can lead to adverse landscape and visual impacts is a concern, particularly in Carlisle, and the proposed larger 400kV pylons will further worsen the position. The Cumbria Cumulative Impact of Vertical Infrastructure (CIVI) document highlights that there are already significant cumulative landscape and visual effects of vertical infrastructure in the area of the proposed National Grid route, and there has been a clear increase in both off-shore and on-land wind farm development from 2010 onwards, with notable increases within the corridor between Workington and Carlisle.
- 2.32 It is likely that the effects of the 400kV line will result in a more dominant feature in the landscape. It is not clear as to whether sufficient consideration has been given to the effects of the development upon sensitive receptors, including the setting of the Solway Coast AONB within Carlisle, the potential for alternative technology to be used within the Workington to Carlisle corridor, and the need to minimise the cumulative impacts on settlements such as Great Orton, Little Orton, Kirkandrews, Cargo, and Rockcliffe as well as sporadic households in the rural area.
- 2.34 Rationalisation of the Electricity North West (ENW) line has afforded some reduction in overhead line (OHL) clutter in a number of locations in the North Section. However, the Council is seeking more substantial mitigation and there is opportunity for further rationalisation and/or undergrounding across the whole of the north route between Wigton and Carlisle to remove both of the 132 kV pylon lines, but especially so near the western edge of Carlisle and the settlements of Cargo and Rockcliffe.
- 2.35 Whilst the distance of the Solway Coast AONB would suggest that the predicted effect on this important landscape designation is judged to be Minor to Moderate

depending on separation distance, the lack of wireframes provided with the PEI would suggest a need for a further detailed review of the landscape and visual impacts of the development upon the AONB. In this regard, there is concern about the potential effects of skylining in certain areas where there may be adverse effects upon the setting of the AONB and other sensitive receptors. It is not clear as to whether or not National Grid has correctly applied its' own Holford Rules (which seek to avoid the incorrect siting of pylons and lines) in relation to skylining.

Recommendations

2.36 A key issue for landscape and visual impact is the cumulative effects of the new 400kV pylons along with the additional 132kV ENW pylons. National Grid must utilise the Cumbria Cumulative Impact of Vertical Infrastructure (CIVI) report to identify and provide further appropriate mitigation in the form of rationalisation of the 132kV ENW line east of Wigton to Harker.

Historic Environment

- 2.37 A major concern is that the desk based assessment and walkover survey of the route corridor has not, as far as we are aware, been completed and the results from this piece of work and other projects that have been recently completed, have not been used in the PEI. We therefore do not feel at this stage that we have all the information available to be able to ascertain the overall impact on the historic environment.
- 2.38 Assets grouped in terms of contemporary usage and date, are grouped within the assessment of setting impacts. Whilst in the majority of cases this is probably an appropriate response, in some individual cases this may not be appropriate mainly due to differences in 'setting' and the level to which setting contributes to the asset's significance. However, overall the majority of the assessments appear to be appropriate.
- 2.39 The 10km distance considered for settings to Frontiers of the Roman Empire (Hadrian's Wall) World Heritage site (FRE WHS) and high grade Listed Buildings and registered Parks and Gardens, and 2km distance for other Listed Buildings and Conservation Areas is unrealistic. It is difficult to envisage the exact impact on parts of the World Heritage Site or Listed Buildings and Conservation Areas without extensive site based assessment without relevant photomontages. The lack of assessment of the effects on views and therefore settings of above ground Heritage Assets using on-site assessments as well as visualisations, including photomontages, seems to be a considerable limitation. This concern is particularly case with regard to the proposed undergrounding beneath Hadrian's Wall WHS (see above Landscape section for description).
- 2.40 Whilst setting can include more than views into, out of and around a Historic Asset, many of these settings have been too narrowly defined, and it is likely that many impacts upon settings will have been missed. Concern is also expressed about the accuracy and relevance of the assessments. More information is required before

settings of Listed Buildings and other above ground Historic Assets have been properly assessed. A key concern is that the PPA Group disagrees with the conclusions of the assessment that there would be "a slight beneficial" significance of effect Frontiers of the Roman Empire (Hadrian's Wall) World Heritage site (FRE WHS).

Recommendations

2.41 A key issue is the lack of information supplied with the PEI in order to assess the potential impacts on heritage assets. National Grid must provide sufficient detailed information to address this issue as part of the Environmental Statement submitted with the DCO.

Ecology

- 2.42 Many of the ecology assessments have been based on incomplete survey data, which will need updating when surveys have been completed. This information will now only be available for incorporation into reports at the ES stage, and so we will not be able to comment on any of the final ecology evaluations and assessments. Survey methodologies appear to be fine but, it is currently difficult to clearly identify a breakdown of all habitats and the degree to which these will be lost. There is inadequate approach and failure to progress with the statutory Habitats Regulation Assessment (HRA) of the impacts of the project on internationally important wildlife.
- 2.43 It appears that the existing incomplete information has been used to scope in or out various designated sites, habitats and species. This approach will not provide a robust assessment until all the information has been considered, and by scoping out features prior to obtaining all the data may result in these features being ignored prior to the final ES.
- 2.44 Clear rationale behind the selection of specific study areas for additional protected species survey and more detailed habitat/NVC survey is not provided, other than an overview of methodology used.
- 2.45 There appears to be a lack of inclusion of undesignated priority habitats in the assessment for each section. Some assessments provide a conclusion of no significant effect despite the fact that surveys are still ongoing. Issues have then been scoped out (habitats and/or species) from certain sections prior to assessing completed survey material.
- 2.46 The present route results in woodland areas, including parts of ancient woodland, being lost or the canopy removed. It appears that some sites or sections that are hydrologically linked to European or International sites have been scoped out. Each subsection lacks any detailed list of qualifying features (SAC, SPA, Ramsar) and interest features (SSSI) which is necessary baseline information to enable assessment of likely significant effects (for example tables just refer to 'plants' or 'habitats' or 'birds').

2.47 There is significant risk of wildlife impacts from the spread of invasive species is not adequately assessed and mitigated; this is a major risk from such a large scale linear project. Managing Invasive Non-Native Species (INNS) across the whole project area is vital as the risk of spread from such a major linear project (which will be using mobile teams moving across the development route) is a major biodiversity risk. The significance of this point must be addressed in the ES.

Recommendations

2.48 A key issue is the lack of information supplied with the PEI in order to assess the potential impacts on terrestrial and avian ecology. National Grid must provide sufficient detailed ecology information to address this issue as part of the Environmental Statement submitted with the DCO.

Socio Economics, Recreation and Land Use

- 2.49 The project will have a number of direct and indirect impacts on the Cumbrian Economy. In terms of the visitor economy, the NWCC project alone and in combination with other major projects has the potential to disrupt tourist trade through displacement and negative image. There is concern that National Grid has underestimated the impact on the visitor economy across the area, by relying on limited local survey and other national tourism studies. Little primary information regarding the visitor economy has been provided in the PEI, with full assessment of the impact on the visitor sector and visitor perceptions not available until the Environmental Statement, including damage to Cumbria's visitor image/brand. The impact of the project on Public Rights of Way (PRoWs), paths and cycleway could also have significant implication for the visitor economy.
- 2.50 Appropriate mitigation, such as support for marketing and promotional activities are required to counter the disruption caused during the construction period and the negative perception driven by the adverse impact of NWCC on the landscape which attracts visitors.
- 2.51 It is in the interests of National Grid and the local economy for the skills to be locally available and for the businesses to be equipped to become part of the supply chain. Although the number of jobs that would be generated specifically by the NWCC Project for the local workforce in Carlisle may not be substantial, the overall benefits of the scheme have to be seen in context with the indirect benefits of the new nuclear power station at Moorside, where there are likely to be cumulative employment benefits. Nonetheless, there will be a need for a financial commitment from National Grid to invest in local skills development and supply chain capability development. Funding will need to be provided to support training providers in delivering additional training to meet National Grid's requirements, but also to support ancillary skills training to mitigate wider impacts on the labour market.
- 2.52 In terms of skills and supply chain, National Grid has developed an outline Employment and Skills Framework (ESF) that sets out key principles that will be used to provide opportunity to local businesses and workers. National Grid is

proposing that 20% of the project workforce and supply chain would be derived from the local area, which is welcomed as a minimum at this stage. However, detailed analysis of the PEI material must be undertaken to understand the justification and appropriateness of this figure. Additionally, further investigation is required to understand how the appropriate local level of involvement on NWCC will be secured; for example at Hinckley Point C Connections (HPCC) project the equivalent figure was secured by a S.106 Agreement.

- 2.53 In terms of impacts on employment sites within Carlisle, the PPA Group previously suggested a number of sites that should be considered for investment and use within the NWCC Project. The assessment for Section C (Sub-Sections C1 and C2) shows that the Draft Order Limits would affect Kingmoor Park Industrial Estate, Kingmoor Park Rockcliffe, and Kingmoor Park Heathlands Estate. There are no planning land allocations for future development sites that fall within the Draft Order Limit with potential to be affected by the development in the long-term. During the construction phase, proposed site compounds would be located on employment land on Kingmoor Park Heathlands Estate, Harker, Kingmoor Business Park, and west of Kingsway, Carlisle. The assessment considers that given the temporary nature of the compounds the effects are not likely to be significant, especially where in the case of the Carlisle Local Plan support is given to business development. Whilst this may be the case, the amount of land to be taken up by the compounds compared to the available allocations seems large, and hence a concern is raised that this may stifle the long-term future development of these sites unless some form of long-term remediation could be guaranteed. It is also noted that a recent permission has been granted for an Energy from Waste plant on a potential compound site and may not therefore be available. The PPA Group has previously expressed concern regarding the resilience of the ENW infrastructure to flooding does not appear to be addressed, indeed the Carlisle 33kV substation is not included in the project.
- 2.54 The PPA Group has previously provided comment regarding maintaining the integrity of the ENW infrastructure in a number of areas across the route, while also ensuring the opportunity for new connections for both users and producers. National Grid's proposed route makes provision for a number of additional 400kV substations, the extension to a number of 132kV substation and substantial reconfiguration of the ENW infrastructure.

Recommendations

2.55 A key issue is the need for National Grid to provide appropriate mitigation, such as support for marketing and promotional activities as well remediation of the compound sites are required to counter the disruption caused during the construction period and the negative perception driven by the adverse impact of NWCC on the landscape which attracts visitors. In addition, National Grid must provide a guarantee that at least 20% of the project workforce and supply chain would be derived from the local area, and this must be supported through a legally binding agreement.

2.56 More investigation is required to understand the detail of National Grid's proposals to ensure the impacts are considered and where possible legacy can be secured.

Construction and Operational Noise and Vibration

- 2.57 Two main sources of operational noise have been identified in Carlisle:
 - Substations, in particular transformers and reactive plant (which are in continuous or semi-continuous operation) and
 - 400kV overhead lines, which can make noise during certain weather conditions (described as wet and dry noise)
- 2.58 In general the approach taken with regard to construction and operational noise and vibration is acceptable, although there are some inconsistencies in the methodology over the sensitivity of receptors and the significance of impact. It is concluded that, with mitigation where appropriate, adverse effects which are significant are not generally likely.
- 2.59 Establishment of the baseline noise conditions should be considered a priority. The assessments and mitigation measures presented are based on assumption of noise levels. Although this could be worst-case and noise levels could be higher, there is also the possibility that the levels are lower.
- 2.60 The suitability of the mitigation measures outlined within the Code of Construction Practice (CoCP) and Noise and Vibration Management Plant (NVMP) can be enforced through planning condition. Given the currently assumed daytime operations within the northern route corridor, this is considered to be a reasonable outcome.
- 2.61 However, there are a number of information gaps, which should be addressed as part of the Environmental Statement (ES), such as source noise levels associated with the proposed helicopter movements / activities (e.g. at Rockcliffe and Cargo). Initial assessment does highlight that there could be significant effects for some properties close to the pylon delivery locations (e.g. at Great Orton). Specific consideration of mitigation will be undertaken to minimise adverse effects and reported within the ES following further investigatory work.
- 2.62 The classing of residential receivers as being of 'medium' sensitivity is also not acceptable. Recommendations have previously been provided by the PPA Group stating that residential/school receptors should be classed as 'high' sensitivity as opposed to being medium sensitivity for noise impacts. This has not been accepted in the submitted assessments and impacts on all the predictions and outcomes. The outcome of the assessments therefore show a potentially more positive outcome for the project than should otherwise be anticipated and is particularly relevant to the areas west and north of Carlisle.
- 2.63 The assessment of the 400kV overhead line noise is reasonable, however there is only limited detail regarding the methodology. The modelling however does not

include noise contribution from the switchgear or auxiliary plant at the substation due to its impulsive nature. No assessment of the proposed 132kV overhead lines or the underground cables is presented, and we would like to see quantitative information relating to the 132kV overhead lines confirming the levels are quiet enough to not have an effect on nearby receptors.

Recommendations

2.64 A key issue is that National Grid must work with the Council to provide sufficient information to enable it to understand and for National Grid to address the noise and vibration impacts of the lines and the supporting infrastructure on local communities, especially to the west and north of Carlisle and the key rural settlements affected by the route.

Air Quality

- 2.65 The PEI for Air Quality has considered the effects of the construction phase in accordance with the relevant guidance. However, an assessment of emissions from construction traffic should be undertaken as the EPUK and IAQM document 'Land Use Planning and Development Control: Planning for Air Quality limit on HGVs is triggered particularly in the Wigton to Carlisle Sub Section (C2). The Council is concerned about key road junctions around Carlisle, i.e. Junction 44 of the M6.
- 2.66 Due to the worst case effects on air quality being during the construction phase, and operational air quality effects will be negligible, it is not expected that there will be any significant residual effects.

Recommendations

2.67 A key issue is that National Grid must provide evidence of an assessment of emissions from construction traffic from the proposed development.

Hydrology & Flood Risk

- 2.68 Clarification of the appropriate standard of protection from flooding and critical infrastructure needs to be clearly set out and established in te Environmental Statement.
- 2.69 Specific modelling may be required to assess flood risk to take account of the following:
 - (i) Any re-assessment of Flood Zones following the December 2015 floods arising from the current EA modelling programme;
 - (ii) Specific modelling of ordinary watercourses and overland flood routes where these are impacted either by the construction works or the permanent works.
 - (iii) Modelling to assess impacts of any stockpiling of materials or re-shaping of land (either permanent or temporary) within Flood Zones 2 and 3 or in areas of identified surface water flood risk

- 2.70 The design appears to be based on 'desk top' studies. At sensitive locations there is uncertainty over the deliverability of the proposed design due to the absence of supporting intrusive geotechnical data; this is particularly important in respect of proposals to use horizontal directional drilling to pass under rivers/estuaries. The potential associated risk could result in forced changes to the location and depth of the crossings, which would have associated wider impacts on other discipline areas.
- 2.71 Careful consideration is therefore required to establish optimal location of crossing of the River Eden in Carlisle, and there is a need to consider potential future lateral migration of the channel and any potential impacts on permanent access tracks and pylon bases; in particular pylon sited just to south of River Eden looks potentially vulnerable to any future lateral migration.
- 2.72 The impacts of surface water flood risk (including overland flows) needs to be considered for both the construction process and on the permanent works.

Recommendations

2.73 A key issue is that National Grid must work with the Council to provide sufficient information on the effects of flooding at the crossing of the River Eden.

Traffic and Transport

Transport Strategy

- 2.74 National Grid's conclusion there are no traffic reasons to favour a multi-modal option for moving materials and workers to the construction sites is not agreed. The PPA Group disagrees with the assessment of impacts relating to 'road based' and 'multi-modal' options, and consider that a multi-modal strategy can reduce traffic in certain locations, and a multi-modal approach could have a significant reduction in overall vehicle-kms, especially for HGVs, which might reduce emissions and accidents. These benefits have not been considered in the PEI, which is a considerable shortcoming.
- 2.75 National Grid has suggested that an additional reason for not choosing the multi-modal option through the central strategic route area is the impacts on capacity of the Cumbrian Coast Line (rail). The Council does not agree with this conclusion as the approach should be to provide investment to mitigate rail capacity issues, in order to keep traffic off the highway and also provide a legacy benefit.

Transport Improvements

2.76 The NWCC project will generate extensive traffic resulting from the importing (and decommissioning) of material for access and haul roads, construction materials, cabling and waste. The Council is concerned about the cumulative impact of these movements on the transport network, especially if a single source is used and a road based approach is adopted. These measures need to be informed by modelling of traffic flows both for the individual development and for the cumulative impact, and is dependent upon the completion of survey data. Additionally, a

number of rail and road construction sites are proposed to store and deploy materials along the route. Consequently, the impact of the movements is likely to require mitigation measures to address pinch points on the network and improve the local highway network.

Public Rights of Way, Cycle Ways and Paths

2.77 The NWCC project will have temporary (during construction) and permanent effect on the PRoWs, paths and cycle ways across Cumbria. This will include closures, diversions and a reduction in the amenity and ability of users to enjoy the routes. Nonetheless, a number of specific mitigation measures are proposed in certain locations, such as a proposed Hadrian's Wall Mitigation Plan. National Grid are proposing a package of measures to mitigate the closures and disruption to the routes, and these will be set out in a PRoW Management Plan (PMP), However these are not yet known and will need to be clarified prior to the submission of the DCO.

Construction Access points

2.78 Additional information has been provided outside the PEI, which show the routes from the main roads, to construction access points. Some of the routes are on narrow lanes with tight bends, sharp crests, narrow bridges, NCN cycle routes or past schools. Measures should therefore seek to provide a high standard of mitigation to address direct and indirect effects. No details of how these routes will be safely managed with the additional HGV flows have been provided. This is particularly important in the area north of Carlisle and should be part of the public consultation.

Recommendations

2.79 A key issue is that National Grid must take a multi-modal approach to the project, and they must provide investment to mitigate rail capacity issues, in order to avoid cumulative impacts and keep traffic off the highway and also provide a legacy benefit. A satisfactory PRoW Management Plan must also be made available prior to the submission of the DCO, and measures should be provided to ensure that a high standard of mitigation is provided for the many construction access points in the interests of highway safety.

Lack of Information and timescales

2.80 There has been a general lack of sufficient information presented within the PEI for a full assessment of the potential effects of the development to be carried out by the PPA Group and its specialists. There are gaps as well assumptions that have been made across a number of topic study areas (whether it is landscape, ecology, noise, hydrology etc), which if carried through to the final Environmental Statement could lead to incorrect assessments and the wrong conclusions drawn on the likely affects. This is addressed in more detail in the topic by topic analysis and will be drawn out in the final PEI response.

- 2.81 These matters will need to be addressed in the final Environmental Statement to be submitted with the DCO application.
- 2.82 The delay by National Grid in presenting material in the PEI has meant that a full consideration of all the documentation presented has been a significant challenge within the timescales to enable the PPA Group to provide National Grid with a properly considered and approved consultation response.

Recommendations

2.83 A key issue cross-cutting the whole of the S.42 consultation is the general lack of sufficient environmental and other information to assess the potential impacts of the development on the local area. National Grid must address this issue in order for it to satisfy not only the Local Authorities and their communities but also the Planning Inspectorate and ultimately the Secretary of State.

Community benefits

- 2.84 National Grid are aware of the local desire to secure a community benefit package. Ofgem, National Grid's regulator, will decide whether a community benefit package is justified and clearly sees National Grid's role as a purely statutory one, in that the upgrade to the grid is only taking place because of NuGen's request to connect the Moorside power station. This has implications as to which organisation would be responsible for the negotiation and payment of any community benefit package. However, notwithstanding this the Council will expect National Grid and NuGen to work with local communities to deliver benefits to the local area where the proposal is located.
- 2.85 It is noted that 'Bringing Energy To Life' is National Grid's new community investment programme in the UK. Being piloted this year it funds projects in communities affected by National Grid's operations. Through Bringing Energy to Life, National Grid only fund projects run by charities and community groups that meet local community needs by providing a range of social, economic and environmental benefits. These might include initiatives that support hard-to-reach members of the community improving inclusion and diversity; initiatives that support economic regeneration or prosperity (for example the development of a social enterprise) or initiatives that support a work placement or retraining scheme which increases employability of people disadvantaged in the workplace; or initiatives such as renewable energy or conservation projects that have a direct and positive environmental impact.. Whilst this initiative is recognized, National Grid do not appear to have any community benefit/grant funding scheme for the locality, and in these circumstances it is unlikely that local communities will derive any social or other benefits from the NWCC Project development.

Recommendations

2.86 A key issue is the need to address adequate community benefits in Carlisle. It is recommended that further discussion is undertaken with both National Grid and

NuGen on this issue, noting National Grid's 'Bringing Energy to Life' programme, and that the Council's position regarding community benefit is highlighted as part of this consultation response.

3. CONSULTATION

- 3.1 The NWCC Project is being put forward by National Grid and Carlisle City Council is a statutory consultee, and therefore it has a direct role in the consultation procedure and the timescales. However, National Grid's Statement of Community Consultation (SoCC) has been considered by the PPA Group and has sought to achieve maximium public engagement with all stakeholders during the process. However, there is a serious question over the adequacy of the timescales that have been allowed for in this S.42 consultation, given the magnitude of the project and the timing of the consultation to include the Christmas Holiday period.
- 3.2 Members will note that this report and Appendix 1 relates to the headline issues and has had to be prepared early on in the consultation period in order to meet the Council's required deadlines for publication of reports. The PPA group of authorities is also preparing a more detailed technical response to support all the headline issues however this involves a number of specialists to advise the authorities. This work is currently ongoing and officers are involved in that process in order that the detailed concerns will be raised with National Grid to supplement the Council's individual response.

4. CONCLUSION AND REASONS FOR RECOMMENDATIONS

- 4.1 At this late stage in the development of the NWCC project, there are significant omissions and gaps in information, which have not been presented with the S.42 consultation and its supporting Preliminary Environmental Information.
- 4.2 There are also major concerns over potential impacts on the environment, especially landscape and visual impacts, and there is scope for further mitigation such as rationalisation of the ENW infrastructure, notwithstanding the level of undergrounding afforded elsewhere on the route of the line.
- 4.3 It is recommended that the Panel considers this report and the Headlines Issues contained in Appendix 1, and refers their observations to Executive as the basis of the Council's response to National Grid's formal consultation on the North West Coast Connections Project.

5. CONTRIBUTION TO THE CARLISLE PLAN PRIORITIES

5.1 When considering the project as a whole over the time span of construction and installation, the project represents an opportunity to support the growth of high quality and sustainable business and employment opportunities for Cumbria. In addition there may be opportunities to develop a skilled and prosperous workforce fit for the future.

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Appendices attached to report:

Note: in compliance with section 100d of the Local Government (Access to Information) Act 1985 the report has been prepared in part from the following papers:

• NWCC National Grid Consultation Information at www.northwestcoastconnections.com

CORPORATE IMPLICATIONS/RISKS:

Community Services - None

Corporate Support and Resources – The use of a Planning Performance Agreement between the relevant Local Authorities and National Grid has enabled the provision of resources to support the ongoing project.

Economic Development – Contained within the report

Governance and Regulatory Processes – This consultation is a formal process set out under Section 42 of the Planning Act 2008. The subsequent application will be in the form of Development Consent Order submitted to the Planning Inspectorate for determination by the Secretary of State.

APPENDIX 1



NORTH WEST COAST CONNECTIONS PRELIMINARY ENVIRONMENTAL IMPACT HEADLINES REPORT

Prepared on behalf of the PPA Group Authorities





Document control

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1.0 Introduction

- 1.1.1 The PPA Group welcome National Grid's commitment to meaningful engagement on project design including technology choices and the significant mitigation that is required. The Group are pleased the informal engagement undertaken thus far has resulted in significant and much needed mitigation.
- 1.1.2 Based on the available information during the Route Corridors consultation (2014) the PPA Group provided positive feedback and support for the 'Onshore North' and 'Onshore South with Tunnel Option' including the Morecambe Bay tunnel.
- 1.1.3 The PPA Group have previously expressed support for the principle of rationalisation of existing overhead lines, therefore, the provision to take down lines is supported so long as the integrity of the electricity distribution network and connection opportunities is not be weakened as a result. Additionally, the Group consider that there are a number of locations where additional lines need to be removed to provide appropriate mitigation.
- 1.1.4 Furthermore, the principle to develop a new 400kV underground cable through the western section of the Lake District National Park is strongly supported, given the alternatives. However, the implications of undergrounding on other topic areas, such as ecology and historic environment must still be addressed. Furthermore, the decision to remove the existing Electricity North West (ENW) 132kV overhead line (OHL) is also strongly supported, given the benefit this will have on the landscape and views in the area.
- 1.1.5 The PPA Group welcomes continued engagement with National Grid and considers that adequately addressing the impacts raised in this paper will minimise the risks to the project through the DCO process, protect our communities and increase delivery certainty for National Grid. The Group wants to continue to engage in positive dialogue to enable delivery of the NWCC project in a way that meets both national and local needs, and is consistent with legislation and government policy.



1.2 Document purpose and structure

- 1.2.1 This report provides a summary of the PPA Group's emerging consultation response and an outline of the headlines from the evaluation of the North West Coast Connections (NWCC) Preliminary Environmental Impact (PEI) Report issued for consultation by National Grid on 28 October 2016. The PEI Report provides a preliminary environmental assessment of the Project and proposed mitigation measures drawing on currently available information
- 1.2.2 This Headlines Report has been drafted in advance of the PPA Group Joint Specialist Response to provide the PPA Group members with an indication of the key emerging issues at an early stage. It is intended that this Report will assist in the development of a joint PPA Group position on issues and help meet challenging committee schedules required for formal Council approval.
- 1.2.3 The Report has been informed largely by the views of topic specialists from WYG supplemented by comments from the PPA Group Authorities where available. It is based on a broad assessment of the extensive documentation and therefore, is subject to change as specialist assessments are undertaken.
- 1.2.4 The remainder of this Report is structured as follows:
 - Section 2 provides an over view of the key headline issues; and
 - Section 3 provides additional detail on the headline issues.



2.0 Key Headline Issues

Landscape and visual impact

Summary key points

Baseline

 Baseline information is sufficient but further engagement is required as the project moves towards the development of the Environmental Statement and DCO submission to develop a more refined assessment that considers additional visual impacts especially from community user/receptor perspective.

Methodology

- The methodology for identifying areas where mitigation is required and options should be assessed is flawed; adopting 'particularly significant' as the bar for mitigation need is not consistent with the EIA Regulations
- There is a flawed interpretation of national policy and guidance that defines and protects the Lake District National Park and its setting.
- There has been a misrepresentation of the visual impact through use of photomontage tools.
- The recently updated Cumulative Impact of Vertical Infrastructure tool does not form part of the methodology for the assessment set out in the PEI Report.
- The PPA Group do not agree with that National Grid's rationalisation policy (one-up-one down) results in a benefit.

Assessment

- Cumulative and sequential impact is not adequately considered in the assessment along whole route. Specifically, the experience of visitors to the Lake District National Park protected landscape have not been adequately evidenced or addressed including the cumulative impacts of viewing this linear project.
- The application of the National Grid's methodology including the Options Appraisal of Alternative Technologies methodology has resulted in the establishment of inappropriate areas for mitigation of the NWCC project. This has led to a piecemeal approach to mitigation and the consideration of alternative technologies.

Mitigation

- Lack of appropriate mitigation of landscape and visual impacts arising from the
 use of over head lines; in particular within the landscape setting of the Lake
 District National Park, and related to cumulative impact to the east of
 Whitehaven, east of Workington following the existing 132kV line north and in
 the area of the Hadrian's Wall World Heritage Site.
- The PPA Group disagree with the assessment and rejection of alternative options for the Duddon Estuary, including a tunnel option, which are based on the flawed assessment of impacts within the landscape setting of the National Park.



Visitor economy

Summary key points

Baseline

- The baseline data set out within the PEI Report in relation to socio-economics, recreation and land use is generally derived from the appropriate sources. However, there is an overreliance on evidence from past projects, particularly in relation to the effects on the visitor economy.
- There is a failure to provide adequate information and evidence on the impact on the visitor economy of Cumbria, which is the largest sector in the County's economy and growing. In particular, there is a lack of evidence to support National Grid's position that Cumbria's visitor image/brand will not be significantly damaged.

Methodology

- Although the overall approach to the identification and assessment of socioeconomic effects is considered to be appropriate, at this stage, there is limited analysis of the Project's alignment with key local and sub-regional policy, specifically in terms of the visitor economy;
- Importantly, National Grid have failed to acknowledge the unique character of the Lake District National Park.
- The methodology adopted to assess the deterrence effect on visitors draws upon the results of survey evidence from other previous projects which raises several important issues; the transferability to NWCC study area, robustness and validity of this original research is uncertain, and there is substantial methodological criticism of the focus on survey-based approaches to evaluating impacts.

Assessment

- Key risks and impacts to visitors' enjoyment of Cumbria's landscapes and environment through access and recreation have not been adequately assessed.
- In particular, the issues associated with negative effects on visitor perceptions, as demonstrated by the recent floods, should be recognised. In addition, as previously noted, the PEI Report does not adequately assess the significance of impact at the local level.
- The impact of disruption to public access and to road and rail transport networks has not been properly considered.
- The emerging assessment underestimates the project's impact on the visitor economy in Cumbria.

Mitigation

- There is a lack of appropriate mitigation of visitor economy impacts, including damage to Cumbria's visitor image/brand.
- There is a lack of appropriate mitigation for disruption to public access and to road and rail transport networks.
- It is considered that appropriate mitigation, such as support for support small and medium sized businesses in the visitor economy and marketing and promotional activities are required to counter the disruption caused during the construction period and the negative perception driven by the adverse impact



of NWCC on the landscape which attracts visitors.

movement and final destination of tunnel spoil.

Tunnel head impacts at Barrow and Heysham

Summary key points Baseline There is inadequate information provided on the storage, movement and final destination of tunnel spoil. No clear information on the need, purpose or use of the temporary works at the tunnel-heads. Noise, vibration, air quality, light, ecology and residential amenity impacts of development at the tunnel-head sites are not adequately stated. Transport assessments have not been carried out. Methodology • The PPA Group disagree with the determination of high sensitivity receptors Standard noise criteria for assessment is inadequate for project of this scale and location. **Assessment** As the baseline data is largely absent the impacts have not been adequately measured and assessed. National Grid have drawn conclusions on accommodation availability. However, there is a lack of clarity regarding the required collaboration with accommodation providers to overcome existing shortfalls and/or raise standards of suitable worker accommodation. Mitigation No meaningful mitigation is proposed to treat the noise, vibration, air quality, light, ecology or residential amenity impacts. No mitigation is proposed to address the impacts caused by the storage,

Transport and connectivity

tunnel-heads.

	Т		
Summary key points			
Baseline			
 The PPA group are significantly concerned that the baseline is insufficient to allow selection of road or multimodal strategy. There is a lack of appropriate modelling of traffic flows to allow assessment and conclusions to be drawn. 			
Methodology			
 A method has not been proposed to enable the selection of the road or multi- modal strategy. 			
Assessment			
The key risks and impacts of traffic movements have not yet been addressed.			

There is incomplete workforce planning and accommodation proposals at the



- The PPA group strongly disagree with National Grid's assessment that railway capacity issues should be a reason for not selecting the multi-modal option. The approach should be to mitigate the rail capacity issues, which would keep traffic off the highway and also provide a legacy benefit.
- Furthermore, the PPA Group disagree with the assessment of impacts relating to the 'road based' and 'multi-modal' options. The multi-modal option will reduce the scale of HGV movements in some areas, which could have safety and environmental benefits.
- Fundamentally, the cumulative impacts have not yet been assessed.
- Key risks and impacts on PRoW and cycle paths have not been adequately addressed.

Mitigation

- There is a lack of appropriate mitigation measures and improvements to address the traffic impacts on the highway network. These measures need to be informed by modelling of traffic flows both for the individual development and for the cumulative impact, and is dependent upon the completion of survey data.
- Mitigation should also address the following, for which no detail has yet been provided; the safe management of traffic on minor roads; the impact of worker accommodation locations – for example for the underground section within the National Park, and the implementation of Travel Plans.
- The PPA Group are concerned that the PRoW Management Plan has yet to be developed. Additionally, the economic impacts upon the visitor economy need to be assessed.
- Measures should seek to provide a high standard of mitigation to address direct and indirect effects.

Skills and supply chain

Baseline The baseline data set out within the PEI Report in relation to skills and supply chain is derived from the appropriate sources, however, there is little detail available to assess the implications.

Methodology

• The methodology is as considered to be appropriate at this stage, and is consistent with that used for other major projects.

Assessment

The PEI Report recognises that there are no published standards that define
the sensitivity and magnitude of socio-economic effects. However, the overall
conclusions are considered to be reasonable and consistent with that used for
other major projects.

Mitigation

 Initial work towards an Employment and Skills Framework is welcomed, however, it is disappointing that the content of the consultation proposals on what measures will be put in place to achieve the targets and objectives is at this stage inadequate to provide support for the proposals.



- The PPA Group support the commitment to secure 20% as a minimum of the workforce from the local labour market however, National Grid must provide commitment to providing support to target those that are currently economically inactive to help ensure they can secure work.
- It is in the interests of National Grid and the local economy for the skills to be locally available and for the businesses to be equipped to become part of the supply chain. There will be a need for a financial commitment from National Grid to invest in local skills development and supply chain capability development.
- There will need to be appropriate training facilities provided not only to support the existing population but also to help attract new workers and their families to come and work in Cumbria.

Ecology

Summary key points

Baseline

- The baseline fails to provide adequate information and evidence to enable assessment of risks and impacts on key habitats and protected species.
- There is an inadequate approach and failure to progress with the statutory Habitats Regulation Assessment (HRA) of the impacts of the project on internationally important wildlife.

Methodology

• The potential risk to biodiversity from the spread of invasive species from the construction of the project has been inadequately addressed in the methodology.

Assessment

• The assessment of impacts on habitats and species have been made in the absence of completed surveys.

Mitigation

- Lack of appropriate mitigation and compensation for impacts on habitats and species The PPA Group would expect these to be measures such as avoiding key hotspots, inadequate construction methods and lack of information regarding compensation for loss and disturbance.
- Significant risk of wildlife impacts from the spread of invasive species is not adequately assessed and mitigated; this is a major risk from such a large-scale linear project.

Historic environment and cultural landscapes

Summary key points

Baseline

- Inadequate evidence of impacts to the historic environment and archeology; in particular from underground construction methods including cabling in the LDNP and Roman Empire (Hadrian's Wall) World Heritage site.
- The baseline focuses on providing information and evidence relating to



archaeology, and is inadequate for listed buildings and Conservation Areas.

Methodology

- Key risks and impacts to World Heritage Sites are not adequately addressed.
 In particular, only one of the three key features of the English Lake District nominated World Heritage Site have been considered.
- There is no evaluation of the setting of other elements of the historic environment for example listed buildings and Conservation Areas.

Assessment

- Inadequate assessment of impacts to the historic environment and archeology. This includes; historic buildings and underground construction methods including cabling.
- The PPA Group disagree with the conclusions of the assessment that there would be "a slight beneficial" significance of effect Roman Empire (Hadrian's Wall) World Heritage site and the candidate English Lake District.

Mitigation

• Without an appropriate evidence base and assessment the PPA Group are unable to provide comment on mitigation measures.



3.0 Emerging Preliminary Environmental Impact Headlines

3.1 Landscape and visual impact

Mitigation Methodology

3.1.1 Fundamentally, National Grid's approach to landscape mitigation, including the Options Appraisal of Alternative Technologies methodology (OAAT) remains flawed. The PPA Group concerns appear not to have been addressed; therefore, the application has resulted in the establishment of inappropriate areas for mitigation of the NWCC project. This has led to a piecemeal approach to mitigation and the consideration of alternative technologies.

<u>Undergrounding in the National Park</u>

- 3.1.2 The principle to provide 23.4km (14.5 miles) of new 400kV underground cable through the western section of the Lake District National Park (LDNP) is welcomed. The decision to remove the existing Electricity North West 132kV overhead line is also welcomed, given the benefit this will have on the landscape.
- 3.1.3 However, the implications of undergrounding on other topic areas, such as ecology and historic environment must be addressed. Additionally, there is a need to consider the appropriate location for the Compound Sealing End (CSE) required as an interface between OHL and the section of underground cabling. The long-term reversible effects of the vegetation loss and disruption to landscape pattern and features due to the implementation of the undergrounding do not appear to have been fully considered. The undergrounding is a major engineering development, and needs to be addressed in far greater detail than is currently in order to understand the potential scale of the temporary disruption to the landscape.

<u>Impacts of the Special Qualities and Setting of the National Park</u>

3.1.4 The proposals for use of pylons and associated cabling within the setting of the Lake District National Park are a major concern. The LDNPA and the PPA Group has very clearly and over a long period of time raised strong concerns about impacts affecting landscape character and views in to and out of the National Park. The PPA Group disagree with the assessment of impacts on the landscape setting of the Lake District National Park; particularly the flawed assessment of national policy and guidance that defines and protects the setting. The Group are concerned that this has led to a inappropriate proposal and the a lack of the required mitigation.



3.1.5 The PEI makes little reference to the 'setting' of the LDNP. The PPA Group's position stated within the Stakeholder Feedback Questionnaire issued in September 2016 was clear that consideration of the wider landscape setting of the Lake District National Park is also of equal importance. Therefore, it is considered that the approach to mitigation currently proposed by National Grid is particularly deficient in its assessment of the effects on the 'setting' of the Lake District National Park.

3.1.6 Three issues on setting arise –

- Definition of setting in policy this is a flawed definition that can be strongly challenged. It fails to consider the long established definition of setting for Protected Landscapes of assessing impacts from within AND outside of the designated area;
- Definition of setting for the NWCC project the application of National Grid's flawed definition of the setting set out above leads to a flawed assessment in the PEI in section 6A.3. The impact on receptors is framed entirely by those receptors within the National Park only;
- Landscape character types the failure of the PEI assessment of landscape and visual impacts to recognise the continuity of landscape types and topography across the National Park boundary is a significant flaw that can be challenged.
- 3.1.7 The route to the north of the LDNP is to be carried on lattice pylons whilst the section through the LDNP is proposed to be undergrounded from the location of the CSE compound located to the north of Drigg. The baseline description of the area provides a description of the existing landscape and visual context; however, the presence of the Low Level Waste Repository at Drigg is a large repository site within the Subsection and is not referenced. The presence of this site is of particular importance in the consideration of the setting of the LDNP and the proposed 400kV route.



- 3.1.8 It is noted that there is a short length of undergrounding extending south of the LDNP boundary to a CSE at Silecroft, which is welcomed. However, following a preliminary review of the part of the Subsection that runs from the head of Duddon Estuary over the mosses to Kirkby-in-Furness, we would question why this section of the route is above ground when it forms the setting of the LDNP. Although, the alignment of the route is outside the boundary line of the LDNP designation, the area of land is of similar/equal value and susceptibility as the LDNP in landscape terms in providing the setting to the LDNP. It is therefore considered that this section should be considered for undergrounding. This option would avoid the considerable problems raised by the proposed route across Foxfield Ridge and the Duddon Mosses SAC, as well as in the setting of the LDNP that have been identified in the Duddon Estuary. Whilst we acknowledge that designing a route crossing the Duddon Estuary is challenging, it is vital that the appropriate design and mitigation is provided.
- 3.1.9 National Policy EN-1, DCLG guidance, the Electricity Act 1995 as well as current planning practice make it clear that the 'setting' of National Parks should be considered in the same way as those areas within the National Park. However, the approach to mitigation currently proposed by National Grid is particularly deficient in its assessment of the effects on the 'setting' of the Lake District National Park. Consideration of the wider landscape setting of the Lake District National Park is also of equal importance along the whole route of the NWCC Project. Landscape planning guidance from DCLG, including that shown on its website, provides clarity that development by 'relevant authorities' impacting on the setting of National Parks should be considered in the same way as those within the National Park. There is a long-established recognition that the legislative and policy framework, including current planning guidance, provides protection of the setting of National Parks. Although these areas are not designated as National Park, developments within the setting can impact upon their statutory purposes and Special Qualities.

The Duddon Tunnel

3.1.10 The PPA Group had also recommended undergrounding beneath the Duddon Estuary to avoid major adverse impacts, particularly at the Foxfield Ridge and the Duddon Mosses SAC, plus the wider landscape setting of the LDNP (see points above about setting of the LDNP). This would also avoid significant visual, landscape and community impacts of the proposals in the vicinity of Kirkby in Furness and Beckside and further south.



3.1.11 However, this recommendation has not been taken forward as part of the consultation proposals. The PPA Group disagree with the assessment and the rejection of alternative options for the Duddon Estuary, including a tunnel option, which are based on the flawed assessment of impacts within the landscape setting of the National Park.

Cumulative Impact

3.1.12 The cumulative impact of the vertical infrastructure, particularly in Allerdale, and Carlisle and north Copeland, 'and in parts of the Furness peninsula is already a concern and larger pylons will further worsen the position. Rationalisation of the Electricity North West (ENW) line has afforded some reduction in OHL clutter in a number of locations in the North Section and notably in the LDNP; however, this does not go provide sufficient mitigation (see below). The PPA Group do not consider that the PEI provides sufficient details to understand the cumulative impact of the project and further assessment is required to assess the impact of the new OHL cumulatively with the existing lines.

Electricity North West Rationalisation

- 3.1.13 National Grid has adopted a one-up-one-down principle in relation to the ENW 132kV OHL, with a number of other areas where additional lines are removed or transferred underground. These are largely focused on the North Section of the route, with additional rationalisation; in the area around the Hadrian's Wall World Heritage Site (WHS), a section at Broughton Moor and in the area north of Westlakes Science Park. However, The PPA Group do not consider that the appropriate level of mitigation of landscape and visual impacts arising from the use of pylon and overhead cables has been proposed. In particular, to the north of the Moorside site, east of Whitehaven, east of Workington following the existing 132kV line north, and Hadrian's Wall World Heritage Sites.
- 3.1.14 Although the additional rationalisation is largely welcomed where the 132kV cable is undergrounded there are concerns regarding the appropriate positioning of Cable Sealing End Platform Pylons (CSEPP), particularly where these are close to the highway or existing properties. This infrastructure is also required where 132kV and below OHL is placed underground to facilitate the cross of the new 400kV OHL.



Electricity North West 132kV Trident over head line

- 3.1.15 A new 132kV trident route on timber poles extends from Millom and converges with the proposed 400kV route near The Green, extending north beyond the 400kV route round the head of the Duddon Estuary. This line has just been revealed and is required to provide a 132kV connection to the Millom area and specifically the Haverigg wind farm extension. The line connects to a 132kV substation (not proposed within NWCC) and is considered to provide an ungraded local electricity distribution network, as well as connection opportunities in the areas of Millom.
- 3.1.16 The principle of upgrading the network in the Millom area is welcomed, however, it is considered that this route, albeit on timber poles, will result in a notable increase in visual clutter within the bottom of the valley. There is also concern about the additional visual clutter from the 132KV trident line and associated sealing end pylons around the wider Duddon estuary including at Foxfield, Kirkby in Furness and south to Lindal in Furness.

Methodology

- 3.1.17 The PPA group are very concerned by the lack of wireframe diagrams to support the photomontages. These make assessment of the impacts, particularly on skylining of the pylons and other infrastructure, difficult to assess. These have been requested by the PPA Group over a long period. While National Grid has very recently agreed to provide some basic wireframes for some viewpoints, this does not fully address the lack of vital information as a key tool for Landscape and Visual Impact Assessment.
- 3.1.18 The selection of viewpoints for photomontages included in the PEI fails to address some of the concerns posed by the proposals. For example, the PEI viewpoints within the Whicham Valley fail to help assessment of the impact to receptors at lower elevation and from the coastal plain around Silecroft. These locations are within the setting of the National Park, and the PPA Group has been clear that this is a sensitive location. It is a flaw in the PEI to fail to adequately cover them in the viewpoint and photomontage assessments.

3.2 Socio-economics, recreation and land use

Visitor Economy



- 3.2.1 The NWCC project alone and in combination with other major projects has the potential to disrupt tourist trade through displacement and negative image. The PPA Group is concerned that National Grid underestimates the impact on the visitor economy across the area, by relying on limited local survey and other national tourism studies. Limited primary information regarding the visitor economy has been provided in the PEI, with full assessment of the impact on the visitor sector and visitor perceptions not available until the ES. The PPA Group consider that National Grid have failed to provide adequate information and the level of assessment required to understand the key risks and impacts on the visitor economy.
- 3.2.2 The impact of the project on Public Rights of Way (PRoWs), paths and cycleway could have significant implication for the visitor economy. This issue is set out below under paragraph 3.4.11 and 3.4.11.
- 3.2.3 The PPA Group consider that there is a lack of appropriate mitigation of visitor economy impacts, including damage to Cumbria's visitor image, and the disruption to public access, road and rail transport networks. Appropriate mitigation, such as support for small businesses and marketing and promotional activities are required to counter the disruption caused during the construction period and the negative perception driven by the adverse impact of NWCC. In addition to specific mitigation measures for key tourism and visitor economy assets affected.

Skills and Supply Chain

- 3.2.4 The PPA Group consider that there is inadequate detail in the PEI to understand the impacts and assess the extent to which these are addressed. Initial work on an Outline Employment and Skills Framework (ESF) is encouraging, however, it is disappointing that measures, targets and objectives are not available is at this stage to support the proposals.
- 3.2.5 Review of the PEI reveals that National Grid is proposing that 20% of the project workforce and supply chain would be derived from the local area, however, detailed analysis of the PEI material must be undertaken to understand the justification and appropriateness of this figure. While the commitment to secure 20% as a minimum is welcomed, further investigation is required to understand how this level of involvement on NWCC will be secured; the Hinkley Point C Connections project secured a similar undertaking by a S.106 Agreement.



- 3.2.6 Furthermore, the PPA Group consider that it is in the interests of National Grid and the local economy for the skills to be locally available and for the businesses to be equipped to become part of the supply chain. However, this needs commitment from National Grid to invest in local skills development and supply chain capability development. Additionally, as part of the package of measures National Grid and their contractors should commit to target economically inactive people in the area and the recruitment of apprentices to support local skills training and development. These measures will help mitigate displacement impacts, however, they will require a funded programme of intervention and support and a commitment from Grid (and their contractors) to recruit from the pool of people that are supported.
- 3.2.7 The PPA Group are concerned that there is very limited detail on mitigation measures that will be required to address the impacts of the NWCC Project, and therefore, few details of how the mitigation will be secured and monitored. It is important that National Grid;
 - makes clear and early commitments to providing funding to support the development of local business capability and capacity, working with the LEP and other local partners, through the development and implementation of a supply chain strategy..
 - progresses the development of a detailed skills action plan to ensure that there is investment in skills development in advance of construction in order to facilitate employment and training of local people.
 - makes early commitments to capital investment in training facilities.
 - provides a clear procurement strategy and to develop specific interventions with measurable and enforceable targets that capture the local benefit for Cumbrian businesses.
- 3.2.8 Additionally, the PEI suggests that the need for investment in education and training facilities will be explored further, and if there is a need, any proposed support and investment measures will be reported in the Employment and Skill Framework and submitted with the DCO. The PPA group consider that such investment is required for appropriate training facilities provided not only to support the existing population but also to help attract new workers and their families to come and work in Cumbria. However, an understanding of the delivery mechanism is required to evaluate the appropriateness of this undertaking. It is also suggested that



Employment sites and land allocations

- 3.2.9 The PPA Group previously suggested a number of sites that should be considered for investment and use within the NWCC Project. A number of these have been proposed for use as construction, rail and helicopter compounds, notably sites at; Port of Workington and Kingmoor Park Lillyhall, Wigton, Aspatria, Flimby, and Heysham. There are also potential effects on land allocations at Barrow Port and Marina, as well as employment and current planning applications proposed for Roosecote Power Station, and land at Heysham, Heysham Port and Heysham Moss. The PEI considers that the likely effects of the NWCC Project would not be significant during both the construction and operational phases. Permanent land take effects would occur in relation to the proposed Tunnel Head and substation areas at Roosecote and Middleton. As both of these areas of ground are currently vacant at present, the PEI states that their use is expected to lead to longer-term beneficial effects. Similarly, their use is considered in the PEI to be consistent with policy objectives as set out in the respective Development Plans.
- 3.2.10 The assessment for the North Route identifies a number of planning site allocations in Local Plans, where there could potentially be conflicts during the construction phase. These include: the Ehen/Keekle Valleys Tourism Opportunity Site and the Whitehaven Eastern Relief Road; a possible Opportunity Site at Hensingham Common comprising 16ha of employment land of which 1.8ha would be used as a site compound; Whitehaven Commercial Park, Lillyhall Industrial Estate and Derwent Forest Site; Kingmoor Park Industrial Estate, Kingmoor Park Rockcliffe, Kingmoor Park Heathlands Estate, and land at Station Road Wigton. In terms of the operational phase, only the Ehen/Keekle Valleys Tourism site would seem to have any long-term effects, as all the others would be used for temporary site compounds.
- 3.2.11 In terms of the South Route, further investigation is required to assess the impacts on allocations described above especially in Barrow and Heysham. In addition the above new permanent lattice trident terminal pylons (with laydown), are shown to be located within the site boundary of a housing site next to Burlington School in Kirkby-in-Furness, which is allocated in the SLDC Land Allocations DPD. This will cut across the allocated site and could have a negative effect on the allocation.
- 3.2.12 Further investigation will be undertaken within the detailed response to understand the detail of National Grid's proposals to ensure the impacts are considered and where possible legacy secured.



Ability to connect to the ENW network

- 3.2.13 The PPA Group has previously provided comment regarding maintaining the integrity of the ENW infrastructure in a number of areas across the route, while also ensuring the opportunity for new connections for both users and producers. National Grid's proposed route makes provision for a number of additional 400kV substations, the extension to a number of 132kV substation and substantial re-configuration of the ENW infrastructure. Initial review of the PEI suggests that reconfiguration of the infrastructure could be better designed to meet future needs of users and producer, for example ensuring connection opportunities at the Stainburn substation. Additionally, previously expressed concern regarding the resilience of the ENW infrastructure to flooding does not appear to be addressed, indeed the Carlisle 33kV substation is not included in the project.
- 3.2.14 Furthermore, initial review of the PEI suggests that the integrity of the ENW network in the Millom area appears to have been addressed by the addition of a 132kV trident line that connects from a 132kV substation (not part of this project) near Millom, round the Duddon Estuary to the network at Lindal. However, it is understood that the new substation is contingent on the development of the Haverigg Wind Farm. The impact of the trident line is considered above.

3.3 Tunnel head impacts at Barrow and Heysham

Lack of details

3.3.1 Significant issues have been raised regarding the impact of the tunnel construction on the local community, transportation links and social infrastructure in Roosecote and Heysham. Initial review of the PEI suggests that there is limited information regarding the tunnel heads and the impact on the surrounding community. For example, information on the construction processes (such as the slurry treatment plant) will not be available until the ES. Proposed construction working hours are included in the Code of Construction Practice that accompanies the PEI Report. In the absence of vital information, the PPA Group considers that the impacts related to noise, vibration, air quality, light, ecology and residential amenity at the tunnel-head sites are not adequately measured, addressed, or mitigated. This issue is a significant concern.



<u>Impact of Tunnel Head construction</u>

- 3.3.2 Following on from the section above the PPA Group has significant concerns about both proposed layouts given their proximity to existing and proposed residential and commercial development, and adverse impacts on PRoW. Little information is available regarding the onsite processes, such as those relating to the 20m high slurry treatment plant or off site movements. Therefore, at this stage it is not clear whether the local areas will be subject to an unacceptable adverse impact on amenity and health for a prolonged period of construction.
- 3.3.3 As stated above, National Grid does not intend to provide more information on the project infrastructure, or an assessment of the impacts on the amenity of the local community until the Environmental Statement (ES) to be submitted alongside the DCO.
- 3.3.4 It should be noted that the indicative layout for the Roosecote tunnel head now reflects the submitted planning application by Centrica for a gas fired power station and energy storage plant. National Grid is confident that there remains sufficient space to accommodate the manufacture of all the concrete segments required for the tunnel. Additionally, after concerns were expressed regarding the location of the segment factory in Heysham, proposals do not include a factory on the Lancashire side.

Worker accommodation

- 3.3.5 During the construction of the project there is likely to be a concentration of over 380 workers at each of the tunnel heads at Barrow and Heysham. Given the number of directly employed workers required for the construction of the tunnel, and the other major projects in local areas, accommodation for workers is a key concern. The PEI concludes that there is limited effect in the Heysham area given access to transport links and the wider catchment of workers. However, the PPA Group consider that a workforce strategy is nevertheless required that will include commitments from Grid to support delivery of worker accommodation (including refurbishment of existing housing stock) so as to avoid adverse impacts on the existing housing market and visitor accommodation
- 3.3.6 The impact in the Barrow area is acknowledged and National Grid commit to working with stakeholders to produce an Accommodation Plan to be submitted with the ES. There are currently no details on the content of the Plan. This accommodation will also cover the area of undergrounding in the LDNP.



3.3.7 The PPA Group is concerned that currently there is incomplete workforce planning and accommodation proposals at the tunnel-heads. The PEI Report does not indicate any collaboration with accommodation providers to overcome existing shortfalls and/or raise standards of suitable worker accommodation.

Material, waste and tunnel spoil

- 3.3.8 The Key Issues Report suggested that the level of construction materials and tunnel spoil generated will place extensive pressure on the transport infrastructure if a road based strategy is followed. Currently National Grid is consulting on both a road based, and multimodal transport strategy (see transport section below). Until a decision has been made it is difficult to appreciate the implications for the materials and waste resulting from the tunnel construction. This is a significant issue that needs addressed before the impacts can be appreciated. National Grid state they are happy to continue to discuss opportunities for the positive use of the tunnel spoil with the PPA Group. However, plans do not appear to have been progressed. A proposed use at Cavendish Dock has been rejected, as the site is part of a SSSI, a SPA and Ramsar, primarily for its bird interest, and National Grid consider that initial investigations suggest there is no reason for its de-notification.
- 3.3.9 National Grid has proposed a materials movement corridor on the causeway forming the southern edge of Cavendish dock. Movement options being considered include conveyors, narrow gauge rail or use of HGVs with traffic control. This route allows direct access to the Port of Barrow as means of importing and exporting materials and waste. However, some of these options may result in closure to the causeway, including a PRoW for the period of use, in addition to possible noise and amenity issues. The PPA Group suggest that there is inadequate information on the storage, movement and final destination of tunnel spoil.

3.4 Transport and connectivity

Transport Strategy

3.4.1 National Grid have yet to select the Transport Strategy, however, review of the PEI suggests that the key risks and impacts of traffic movements have not yet been addressed.



- 3.4.2 The PPA Group are significantly concerned that National Grid are not consulting on a single and coherent transport strategy. This is a major issue that has widespread impact across other topic areas, such as visitor economy and waste and material. Additionally, the PPA Group and affected communities need to understand how the project will be delivered and what the mitigation and transport improvements are. This approach is inadequate and therefore the PPA Group cannot support National Grid's transport strategy at this point. Given these fundamental issues it is suggested that a subsequent consultation may be required when National Grid have sufficient information and a single strategy to appropriately address these issues.
- 3.4.3 National Grid conclude that there are no traffic reasons to favour the multi-modal option because of increased flows on more sensitive routes, the road option having a greater impact on the strategic routes which are generally less sensitive. The PPA Group do not accept this conclusion, as it is not clear that this is this appropriate and whether it should apply in all cases. For example, the multi modal strategy would reduce the number of traffic movements though Barrow.
- 3.4.4 Overall, the PPA Group strongly disagree with the assessment of impacts relating to the 'road based' and 'multi-modal' options. The multi-modal option will reduce the scale of HGV movements in some areas, while also having safety and environmental benefits. Additionally the Group are concerned that the cumulative impacts have not yet been assessed.
- 3.4.5 The multi-modal options will have a significant reduction in overall vehicle usage, especially for HGVs. This will reduce emissions and accidents, however, these benefits have not been considered.
- 3.4.6 Furthermore, the PPA Group do not accept National Grid's assertions that railway capacity issues should be a reason for not selecting the multi-modal option. The approach should be to mitigate the rail capacity issues, which would keep traffic off the highway and also provide a legacy benefit.
- 3.4.7 For the central strategic route area National Grid suggest an additional reason for not choosing the multi-modal option is given as the impacts on capacity of the Cumbrian Coast Line, Workington Port and Workington Port rail depot, although it is understood that there is sufficient capacity at Workington Port to accommodate the additional tonnage.



<u>Transport improvements</u>

- 3.4.8 The construction of the NWCC project will require extensive traffic related to the importing (and decommissioning) of material for access and haul roads, construction materials, cabling and waste. There is concern about the cumulative impact of these movements on the transport network especially if a single source is used and a road based approach is adopted. Additionally, a number of rail and road construction sites are proposed to store and deploy materials; these are all along the route and are more concentrated in the areas where underground technology will be used, such as Drigg, Silecroft and Foxfield. The transport infrastructure along the route and in these areas in particular is constrained, therefore, the impact of the movements is likely to require mitigation measures to address pinch points on the network and improve the local highway network, and minimise impact on nearby residents and businesses including at Foxfield Business Park.
- 3.4.9 Fundamentally, there is a lack of appropriate mitigation of traffic impacts on the highway network, which needs to be informed by modelling of traffic flows both for the individual development and for the cumulative impact, and is dependent upon the completion of survey data. It is suggested that mitigation should also address the following, for which no detail has yet been provided; the safe management of traffic on minor roads, the impact of worker accommodation locations for example for the underground section within the National Park, implementation of Travel Plans
- 3.4.10 Lack of information on mitigation is a serious issue that needs to be addressed to enable a full assessment to be made.

Public Rights of Way (PRoW), cycle ways and paths

3.4.11 The NWCC project will have temporary (during construction) and permanent effect on the PRoW across Cumbria and those related to the tunnel head at Heysham. This will include closures, diversions and a reduction in the amenity and ability of users to enjoy the routes.



- 3.4.12 Review of the PEI reveals that the project will have an adverse impact on a number of PRoW, paths and cycleways. Key risks and impacts on PRoW and cycle paths have not been adequately addressed. More in depth assessment is required to understand the extent of these impacts across the area, however, at this stage National Grid are proposing a package of measures to mitigate the closures and disruption to the routes. These will be set out in a PRoW Management Plan (PMP) that will form part of the application for DCO. In addition, a number of specific mitigation measures are proposed in certain locations, these relate to proposed plans for the mitigation of key features such as a proposed Hadrian's Wall Mitigation Plan. These specific plans will also be secured in the DCO. The PPA Group are concerned that at this time there is a lack of clarity on appropriate mitigation measures that are required.
- 3.4.13 While the undergrounding through the Park be supported, in terms of setting, the A5092 transport corridor approach to the Western Lakes, along with the 'view out' of the National Park from Open Access and specific PRoW are undeniably affected by the proposed stretch of pylons that hug the National Park Boundary through Whicham and the Duddon.

Construction Access Points

3.4.14 WYG have been provided additional information outside the PEI showing the routes from the main roads, such as the A596, to construction access points. There are a significant number of access points to service the 1000 individual construction sites across the area. Some of the routes are on narrow lanes with tight bends, sharp crests, narrow bridges, NCN cycle routes or past schools, e.g. Beacon Hill School in Aspatria. Access to the Barrow tunnel head is off the A5087 which has residential frontage, on-street parking and a low bridge. No details of how these routes will be safely managed with the additional HGV flows have been provided. This should be part of the public consultation.

Highway Assessment

3.4.15 The impact of construction traffic has been assessed based on the average daily flow in the busiest peak four week period – based on engineering judgement. Whilst the principle that the impact should be reasonably prolonged (not just for a day or two) is accepted it is not clear why four weeks is appropriate.



3.5 Terrestrial and avian ecology

Habitats Regulation Assessment

- 3.5.1 The PPA Group are significantly concerned that there has been a failure to progress with the statutory Habitats Regulation Assessment (HRA) of the impacts of the project on internationally important wildlife. This has resulted in a failure to identify risks, such as those associated with the Ravenglass Estuary SAC of undergrounding/HDD operation, and of tunnel option on Morecambe Bay SAC/SPA. Furthermore, the PPA Group are concerned that a number of sites or sections which are hydrologically linked to European or International sites have been scoped out (e.g. South Solway Mosses SAC); Additionally, it is considered that the lack of any assessment of cumulative impacts on ecology, including EU protected sites and species, will affect the timescale for the HRA.
- 3.5.2 This could lead to significant delays to the acceptance of the DCO by PINS if not addressed.

Ecology Surveys

- 3.5.3 Many of the ecology -assessments have been based on incomplete survey data, which will need updating when surveys have been completed. This information will now only be available for incorporation into reports at the ES stage so we will not be able to comment on any of the final ecology evaluations and assessments.
- 3.5.4 Additionally, some assessments provide a conclusion of no significant effect despite the fact that surveys are still ongoing.

Topics Scoped out

- 3.5.5 It appears that the existing incomplete information has been used to scope in or out various designated sites, habitats and species. This approach will not provide a robust assessment until all the information has been considered, and scoping out features prior to obtaining all the data may result in these features being ignored prior to the final ES. Provision of habitat areas in table format should be sought for the development order limts sections.
- 3.5.6 Issues have then been scoped out (habitats and/or species) from certain sections prior to assessing completed survey material. The PPA Group suggest this results in unreliable conclusions on significance of potential impacts.



Non-designated priority habitats

3.5.7 The PPA Group are concerned that non-designated priority habitats are not effectively assessed and therefore are not appropriately protected. This is of particular significance in the southern section where undergrounding is proposed which has potential to result in more significant damage to habitats. Additionally, parts of the assessment rely on Aerial Photo Interpretation and therefore it has not been possible to possible to accurately assess the value of most habitats using this approach.

Invasive Non Native Species

3.5.8 Although invasive species have been recorded as present or absent within entire route sections there is no detail on location of Japanese knotweed where it may provide a constraint to the works. The PPA Group consider that in view of the large geographic extent of the linear project it is vital that non-native invasive species are dealt with extreme care due to the risk of spread over a wide area posing potential significant risks to biodiversity. In particular – Japanese knotweed can take many years to eradicate, therefore it will be important to deal with this problem well in advance of the proposed construction schedule.

Effective Mitigation

- 3.5.9 The PPA Group are concerned that the mitigation measures outlined are not considered adequate. There is a lack of appropriate mitigation and compensation for impacts on habitats and species; in particular not avoiding key hotspots, inadequate construction methods and compensation for loss and disturbance.
- 3.5.10 Design mitigation will be important to avoid impacts on several County Wildlife Sites and woodland areas. For example, the present route results in woodland areas, including parts of ancient woodland, being lost or the canopy removed. Compensation is proposed by National Grid to comprise planting of a similar area of woodland to that lost. However, loss of mature woodland and in particular ancient woodland cannot be mitigated or compensated for. The first consideration should be the avoidance of woodland through micro-siting but the information provided does not make it clear in most cases whether micro-siting has been considered and why this cannot be achieved.



3.5.11 The PPA Group consider that in all cases avoidance should be adopted, and if this is impossible then the reasons for this need to be highlighted and explained in detail. Additional compensation will be expected where loss of mature/ancient woodland is still being considered. It is also considered that a clear Code of Practice for any development work in the vicinity of ancient or mature woodland.

Protected Species Impacts

3.5.12 Clear rationale behind the selection of specific study areas for additional protected species survey and more detailed habitat/NVC survey is not provided other than an overview of methodology used. It is not always apparent how disturbance to protected species will be assessed and addressed during construction and maintenance phases.

3.6 Historic environment and cultural landscapes

World Heritage Sites

- 3.6.1 The PPA Group are concerned that the key risks and impacts to World Heritage Sites are not adequately addressed. In particular, only one of the three key features of the English Lake District nominated World Heritage Site have been considered. Although the assessment terminology used in the PEI is the same as in the ICOMOS HIA Guidance (2011), it exclusively focuses on the physical historic environment as an attribute of Outstanding Universal Value (OUV). There is a tendency within the suite of PEI documents to treat World Heritage as solely a historic environment issue. However, this approach covers only part of the first of the three themes of OUV which have been identified for the English Lake District. There is a need to ensure that the HIA takes into account the full range of OUV attributes from the three main themes. There is also a need to make sure that the wider EIA also takes into account the full range of National Park Special Qualities. Currently it is not clear that the PEI has done this.
- 3.6.2 Furthermore, the PPA Group consider that there is a failure to provide adequate information and evidence to enable assessment of impacts on the Frontiers of the Roman Empire (Hadrian's Wall) World Heritage site (FRE WHS).



- 3.6.3 The PEI concludes that for both the FRE WHS and the candidate English Lake District WHS, the net effect of NWCC would be "a slight beneficial significance of effect on this asset as a whole". This appears to be based primarily on the removal of ENW infrastructure and improvement of the ability to appreciate the physical historic landscape. In terms of the Lake District National Park, this relates only to part of the first theme of Outstanding Universal Value (OUV).
- 3.6.4 The HIA should also assess the potential impact on OUV of the surface treatment of the undergrounded section within the National Park.
- 3.6.5 Without a demonstrably comprehensive HIA it is it is difficult at this stage to accept the conclusion that NWCC would have "slight beneficial significance" for the OUV of the candidate English Lake District WHS.

Historic Environment and Archaeology

- 3.6.6 The PPA Group consider that there is inadequate evidence and assessment of impacts to the historic environment and archaeology across the route, and in particular from underground construction methods including cabling in the Lake District National Park. Undergrounding will have a major impact on any archaeological remains within the corridor and although mitigation can be provided, in terms of evaluation and recording, there is a risk that any archaeological remains could be destroyed on the route and they are a finite and unrenewable resource.
- 3.6.7 A major concern is, however, that the desk based assessment and walkover survey of the route corridor has not, as far as we are aware, been complete; and no viewpoint analysis is provided in connection with potential impacts on the setting of designated heritage assets. It is understood that the results from this piece of work and other projects that have been recently completed (i.e. aerial mapping project/Romans in Ravenglass), have not been used in the PEI. We therefore do not feel at this stage that we have all the information available to be able to ascertain the overall impact on the historic environment.

3.7 Project wide comments

Cumulative impact assessment



- 3.7.1 As stated in the PPA Group comments on the PEI Cumulative Effects Briefing Paper, the adopted four-stage approach which reflects the approach within the PINS Advice Note 17 is welcomed. It is understood that the PEI will only contain stages 1 and 2 as set out in the advice note, and that the EIA procedure will enable decision making as to the actual final cumulative impacts to be assessed, their extent and residual outcomes.
- 3.7.2 As this is such a critical element for decision makers, whilst paragraph 22.1.6 states that "Consultee comments have been considered during the compilation of this chapter, with the ZoI and assessment methodology amended where appropriate", it would be more helpful and clearer to the Planning Inspectorate in the future for a table be provided in the ES setting out whether or not the changes sought by the PPA Group have been accepted, and if they have not then there should be clear justification for doing so.
- 3.7.3 There are a number of specific areas that require clarification, which relate to the assumptions for the distances used for the Zones of Influence identified for each of the topic areas covering: landscape (10km), Socio economics (20km), terrestrial and avian ecology (20km), historic environment (10km), and waste (10km).
- 3.7.4 With regard to marine matters, we note and welcome that Table 22.1 now confirms that the Islet associated with the Morecombe Bay tunnel, consultation with relevant bodies and Government levels and that works in the Duddon and Ravenglass estuaries are to be included.

PEI consultation

3.7.5 In a letter dated 21 October 2016, the PPA Group had expressed concern to National Grid that despite a 10-week consultation period running from 28 October 2016 to 6 January 2016, this was a compromise position and had been based on assurances by National Grid that technical information would be released to the Authorities well in advance of the formal consultation date. This length of time was needed to allow all the PEI material to be properly considered and for that consideration to inform the Local Authorities' consultation response.



3.7.6 However, notwithstanding that assurance, several deadlines offered by National Grid were passed without the technical information being released on time. Consultation responses have to be approved by the various Local Authority Executives prior to issue to National Grid, and there is a significant lead-in time for all Committee reports to be prepared by the Local Authorities. The delay by National Grid in presenting material in the PEI has therefore meant that a full consideration of all the documentation is a significant challenge within the timescales. As a consequence the original request that the S.42 consultation be extended to the 3 February 2017 still stands to enable the PPA group to provide National Grid with a properly considered and approved consultation response, and enable National Grid to have full information on local sensitivities and impacts when it finalises the application ready for the DCO submission.

Lack of information

- 3.7.7 There has been a general lack of sufficient information presented within the PEI for a full assessment of the potential effects of the development to be carried out by the PPA Group and its specialists at this formal stage of consultation.
- 3.7.8 There are gaps as well assumptions that have been made across almost all topic areas (including landscape, ecology, transport, historic environment, socio-economics, noise, hydrology etc). If this is carried through to the final Environmental Statement could lead to incorrect assessments and the wrong conclusions drawn on the likely affects. Additionally, the approach would be inadequate in terms of ongoing engagement with the PPA Group and other organisations. This is addressed in more detail in the topic-by-topic analysis and will be drawn out in the final PEI response.
- 3.7.9 The PPA Group are concerned that these matters need to be addressed and consulted on prior to the development of a Environmental Statement and the submission of the DCO.

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Report to Environment & Economy Overview and Scrutiny Panel

Agenda Item:

A.6

Meeting Date: 1 December 2016

Portfolio: Finance, Governance and Resources

Key Decision: No

Within Policy and

Budget Framework YES

Public / Private Public

Title: 2nd QUARTER PERFORMANCE REPORT 2016/17

Report of: Policy and Communications Manager

Report Number: PC 24/16

Purpose / Summary:

This report contains the 2nd quarter performance against the current service standards and a summary of the Carlisle Plan actions 2015-18.

Details of the service standard are in the table in Section 1. The table illustrates the cumulative year to date figure, a month-by-month breakdown of performance and, where possible, an actual service standard baseline that has been established either locally or nationally.

The updates against the actions in the Carlisle Plan follow on from the service standard information in Section 2. As many of the key actions contained within the outgoing Carlisle Plan have been completed, actions and projects have recently been refreshed in the 2015-18 Carlisle Plan. Work is continuing on the future report content and the best way of presenting this information to future panels. The views of the Panel are welcomed as part of this process.

Recommendations:

- Consider the performance of the City Council presented in the report with a view to seeking continuous improvement in how the Council delivers its priorities.
- 2. Consider future report content with a view to showing progress in delivering the Carlisle Plan and associated City Council performance.

Tracking

Executive:	19/12/16
Overview and Scrutiny:	Community Overview & Scrutiny 24/11/16
	Environment and Economy Overview & Scrutiny 01/12/16
	Resources Overview & Scrutiny 06/12/16
Council:	N/A

1. BACKGROUND

Service standards were introduced at the beginning of 2012/13. They provide a standard in service that our customers can expect from the City Council and a standard by which we can be held to account. The measures of the standard of services are based on timeliness, accuracy and quality of the service we provide in areas that have a high impact on our customers.

Regarding the information on the Carlisle Plan, the intention is to give the Panel a brief overview of the current position without duplicating the more detailed reporting that takes place within the Overview and Scrutiny agendas and Portfolio Holder reports.

2. PROPOSALS

None

3. CONSULTATION

The report was reviewed by the Senior Management Team on 8 November 2016 and will be considered by the Overview and Scrutiny Panels on the following dates:

Community Overview & Scrutiny 24/11/16

Environment and Economy Overview & Scrutiny 01/12/16

Resources Overview & Scrutiny 06/12/16

4. CONCLUSION AND REASONS FOR RECOMMENDATIONS

The Panel are asked to comment on the 2nd Quarter Performance Report prior to it being submitted to Executive.

5. CONTRIBUTION TO THE CARLISLE PLAN PRIORITIES

Detail in the report.

Contact Officers: Steven O'Keeffe Ext: 7258

Martin Daley 7508
Gary Oliver 7430

Appendices None

attached to report:

Note: in compliance with section 100d of the Local Government (Access to Information) Act 1985 the report has been prepared in part from the following papers:

None

CORPORATE IMPLICATIONS/RISKS:

Chief Executive's – Responsible for monitoring customer satisfaction and financial management.

Deputy Chief Executive's – Responsible for monitoring and reporting on service standards, progress in delivering the Carlisle Plan, and for managing high level projects and team service standards on a day-to-day basis.

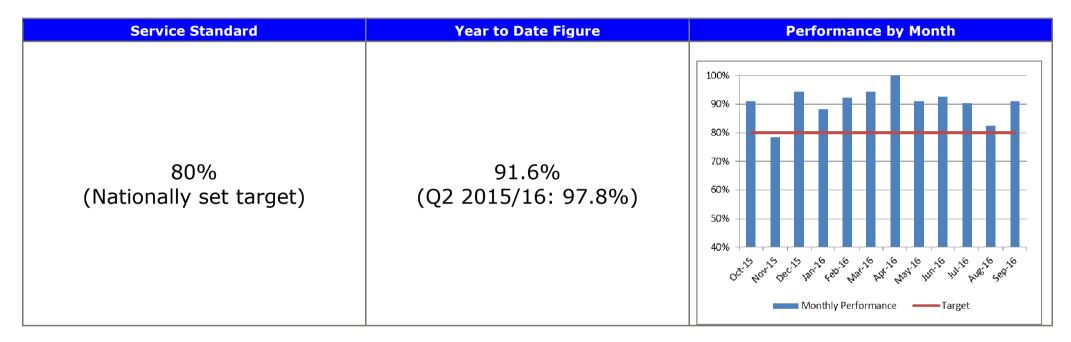
Economic Development – Responsible for managing high level projects and team level service standards on a day-to-day basis.

Governance – Responsible for corporate governance and managing team level service standards on a day-to-day basis.

SECTION 1: 2016/17 SERVICE STANDARDS

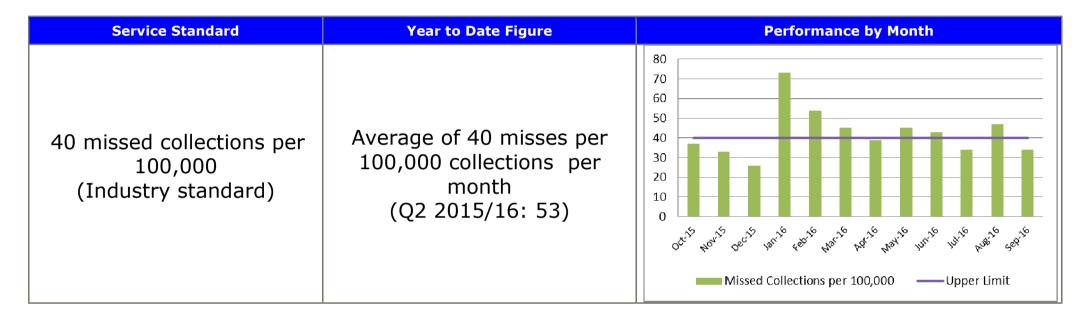
Service Standard: Percentage of Household Planning Applications

processed within eight weeks



76 household planning applications were processed during Quarter 2 compared with 71 for the same period last year.

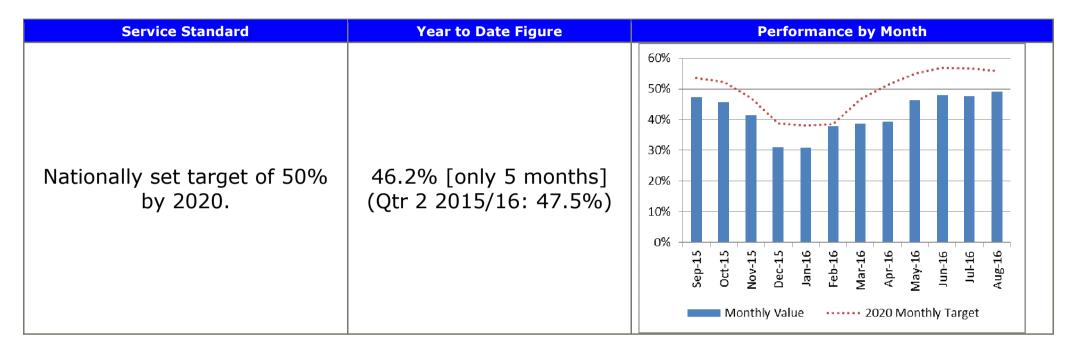
Service Standard: Number of missed waste or recycling collections



The council was scheduled to make 1,237,791 collections during this quarter. The number of failures per 100,000 for the year to date is 40 which equates to approx. 1,000 (0.08%) actual missed collections in the quarter.

The high figure from the same period last year was caused mainly by the cancelled collections and subsequent delays in catching up following the major police incident.

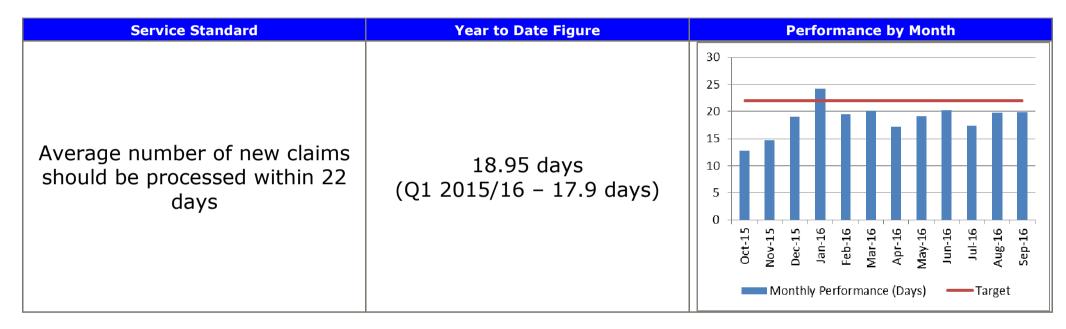
Service Standard: Percentage of household waste sent for recycling (Collected and City Council bring sites)



Up until last month new builds didn't receive a kerbside collection of recycling therefore some residents were placing garden waste and dry recycling into their bins. From September 2016 these properties now receive a kerbside collection of green box and garden waste. Plastic and card will be added in May 2017 along with rural properties who don't receive a kerbside collection where practically possible.

The Quarter 1 figure for 2015/16 overall recycling figure quoted was reported inaccurately high. The inaccuracy prompted a data quality check on the data relating to the service standard and this was carried out in October 2016. The check was reviewed and its findings accepted by SMT at their meeting on 8 November 2016.

Service Standard: Average number of days to process new benefits claims



Service Standard: Percentage of Corporate Complaints dealt with within timescale

Service Standard	Year to Date Figure	Total Number of CCs per Directorate
A full response issued to the customer within 15 days of receipt at each stage.	100% (Q2 2015/16 – 75%)	Deputy Chief Exec's Team (including Local Environment) – 9 Governance – 0 Economic Development – 3 Resources – 2 Chief Exec's Team – 1

There were 15 corporate complaints received during the first quarter compared with 19 in the same period last year.

Section 2: Carlisle Plan 2015-18 Summary

PRIORITY – Support business growth and skills development to improve opportunities and economic prospects for the people of Carlisle Local Plan

Major projects under this priority include the development of the Local Plan 2015-2030 which is an essential building block for future development, whether housing or business. The Local Plan is nearing completion following an independent examination and was formally adopted by Council for adoption on the 8th November.

The Local Plan is a key catalyst for growth; however work does not stop with its completion. Further activity to support growth and the economy will continue with:

- Carlisle South Master Plan
- Community Infrastructure Levy
- Supplementary Planning Documents

Carlisle South

An expression of interest to include Carlisle South, a broad location identified through the Local Plan which could accommodate up to 10,000 new homes, within the Governments Locally Led Garden Village programme was submitted in July. Inclusion in the programme affords access to external support and expertise and priority access to funding.

Durranhill

The major improvement works to Durranhill industrial estate are progressing well. The new access road, Locke Road, is now open and works to widen the original estate road are well underway and nearing completion. Increased occupier interest has been noted on the estate and several long term voids have recently been occupied.

Enterprise Zone

Following the successful bid and the Chancellor's announcement in November 2015, the Carlisle Enterprise Zone was formally established on 1 April 2016. Having an Enterprise Zone shows that Carlisle is business friendly and up for growth. The aim is to attract new business to the area with a range of discounts

and 100% enhanced capital allowance for plant and machinery. The Carlisle Enterprise Zone at Kingmoor Park offers 122ha ready for development and will potentially generate 2,590 jobs over its lifetime. There has been an increase in interest and enquiries in Kingmoor Park since the EZ was announced.

Public Realm - City Centre Orientation

Work continues to progress in relation to the system of information hubs and finger posts proposed for the City Centre. Cumbria County Council consent had been secured, subject to issuing of relevant permits, and the completion of a consultation exercise. Technical design work is complete, copy has been finalised and we are working with the signage manufacturer to agree an installation programme.

Carlisle Economic Partnership

The City Council continues to work closely with public and private sector partners through the Carlisle Economic Partnership (CEP). The two key themes identified in their action plan are skills and infrastructure.

The focus for the CEP over the next 12 months will be to further develop an Economic Action Plan and a Skills Strategy for Carlisle which fits with the Cumbria Strategy and supports key economic opportunities for growth such as the Enterprise Zone and Carlisle Airport.

Local Enterprise Partnership

Engagement with Cumbria Local Enterprise Partnership (Cumbria LEP) and Centre of Nuclear Excellence (CoNE) continues to be vital in supporting the CEP key priorities for Carlisle of Infrastructure, Skills and Housing to help deliver growth.

The LEP submitted its bid and shortlist of projects for Local Growth Fund 3 funding to the Government in July 2016. This programme includes support to redevelop the Citadel and improve the train station in Carlisle. An announcement on funding is expected in or around the timing of the Government's Autumn Statement.

PRIORITY - Further develop sports, arts and cultural facilities to support the health and wellbeing of our residents.

Healthy City

The Steering Group has developed over the past few months to include representation from Cumbria Partnership NHS Foundation Trust, Children's Services, Adult Services and the County Council Chair of Local Area Committee.

The Carlisle Partnership

The Carlisle Partnership sees organisations from across the public, private, voluntary and community sectors, supporting and developing projects and agendas across the city.

The Carlisle Partnership AGM was held at Harraby Community Centre at the end of September. The agenda focussed on improving place vibrancy and vitality and the benefits of Health in All Policies (HiAP) approach to policy development and finished with a discussion around the key priority areas for the Partnership and some of the issues, challenges and opportunities within the Carlisle district. The event attracted a record number of attendees and received excellent feedback from partners.

Sports Development

The Community Sports Activation Fund project was a success over its 3 year period. In total we engaged 6919 individuals in activity through the project and this was in line with the targets we set. As part of the scheme we delivered initiatives that targeted minority and hard to reach groups. There is nothing outstanding from the project and Sport England are happy with our reporting. Going forward, we are working to understand the new Sport England Strategy to tackle inactivity in the area and we will be working with local partners to ensure we can support future activities.

Harraby Campus Development - Certificate of practical completion has been supplied by Cumbria County Council. The leasehold has been agreed directly between Cumbria County Council and Community Associations.

Arts Development

Following the floods in December 2015 the Old Fire Station has now fully reopened

and has a very busy programme of events for the Autumn/Winter period.

The Council is working with partners at Tullie House Museum and Art Gallery and the University of Cumbria to establish a new 'cultural consortium.' This group is still at an embryonic stage but will look to focus on raising the awareness and engagement in cultural opportunities across Carlisle.

The Council is also taking part in the LGA Cultural Peer Challenge Programme. Following an application process in July the Council has been accepted for this new challenge programme. The on-site work will take place in February 2017 and will seek to assist the Council (and partners) in developing the local cultural offer and impact.

PRIORITY - Continue to improve the quality of our local environment and green spaces so that everyone can enjoy living, working in and visiting Carlisle.

Rethinking Waste

Work continues on the development of the new rounds and developing options to shape the new service. Recycling of glass, paper and cans is currently collected by four vehicles operated by FCC Ltd. This contract ends on 28 February 2017 and will return to City Council operation from 01 March 2017. From May 2017, the rounds will be merged to create new recycling rounds using a single collection vehicle for glass, cans, paper, plastic and card. This should promote recycling through:

- increased participation residents who don't already receive a collection will receive the full recycling service
- collection using a single split-back vehicle that should reduce litter / spillages
 as crews will be tipping into the back of the vehicle rather than sorting into
 separate compartments.
- simplifying the collection calendars

Promoting Recycling

Neighbourhood Services' Technical Officers continue to promote recycling, particularly in gull sack areas where there is evidence of reduced levels of recycling and increased incidence of side-waste.

As the new changes are introduced, officers will be visible on collection days monitoring levels of participation in recycling and compliance to service standards. Advice as necessary will be given to residents to reduce waste and encourage recycling.

Street Cleaning and Enforcement

Any additional bags (side-waste) not inside the gull sack or bin are currently 'stickered' to advise the resident to take the bags back in until next collection or take them to their nearest Household Waste and Recycling Centre. Properties where bags are not removed within 48 hours are sent a letter offering advice on recycling but also reminding people of the service standards and risk that they could face a fine for littering or fly-tipping. When evidence is found in fly-tipped

bags this is followed through with the resident being issued with a fixed penalty

notice for littering.

PRIORITY - Address current and future housing needs to protect and improve residents' quality of life.

The City Council continues to work in partnership with local housing association partners and the Homes and Communities Agency to address housing need and support new developments. Current pipeline schemes include:-

- The Demonstration Project on the Council owned site at Beverley Rise,
 Harraby: this scheme would deliver approximately 40 units for affordable
 rent, in partnership with Riverside and Carlisle College. Students from the
 College will benefit from practical onsite development training.
- Old Brewery Residences, Caldewgate the Council has been working with Impact Housing Association to support their plans to bring redundant exstudent accommodation back into use to deliver a mix of approximately 35 apartments and townhouses for affordable rent. The design would incorporate flood resilience measures.

A new 38 apartment Extra Care scheme – Bramble Court – is due to open in Brampton in November, providing independent accommodation for older residents with care and support needs. All of the properties are for social rent and 24/7 onsite care will be provided by Imagine Independence. The City Council has worked closely with the scheme provider, Impact Housing Association, Adult Social Care and Brampton and Beyond Community Trust to support the delivery of the scheme, as extra care housing is a crucial priority, due to the changing demographics around the ageing population.

PRIORITY – Promote Carlisle regionally, nationally and internationally as a place with much to offer - full of opportunities and potential

This is best demonstrated by the many projects and initiatives worked on across the district as part of the Carlisle Partnership and Carlisle Ambassadors.

Carlisle Ambassadors can be defined as, 'A proactive community of passionate individuals, businesses and organisations who participate in projects to raise the profile of Carlisle and make it a better place to live, work and visit.' The Ambassadors have influence and directly 'give a voice' to Carlisle locally, within Cumbria and further afield.'

The last meeting was held on 22 September at Eden Golf Club with 14 businesses showcasing their innovations and was very well attended. Meetings continue to be held quarterly and are regularly attended by over 220 business people. To date 134 organisations have become members; keen to collaborate on projects and support each other to help grow and improve the Carlisle offer. The next meeting of Carlisle Ambassadors is to be held on Thursday 17 November at the Hallmark Hotel.

As well as some of the cross-over work carried out with the Carlisle Partnership and the Ambassadors, the City Council continues to work closely with partners through the Carlisle Economic Partnership (CEP) (as mentioned above), the action plan from which sets out actions to address skills gaps by identifying skills needs for growth and encouraging provision which meets those needs.

Engagement with Cumbria Local Enterprise Partnership (Cumbria LEP) and Centre of Nuclear Excellence (CoNE) continues to be vital in supporting the CEP key priorities for Carlisle of Infrastructure, Skills and Housing to help deliver growth.

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