

Ref: Morgan and Morecambe Offshore Wind Farms Transmission Assets (EN020032) – Request for Site Visits

Interested Party Number - 20053845

To the Examining Authority Panel,

We refer to your correspondence dated 8 May, in which the Examining Authority proposes to conduct a series of accompanied site visits. We respectfully request that the following locations be included in the itinerary for the material reasons outlined below.

1. Background

The Lancashire Association of Local Councils, Fylde Area Committee Energy Working Group (EWG) supports the realisation of opportunities and avoidance of adverse impacts arising from energy related developments.

The proposed approach taken by the Applicants of the Morgan & Morecambe offshore wind transmission assets is characterised by multiple unacceptable adverse impacts, being neither economic, nor efficient and does not deliver the lowest whole system cost to the consumer.

A Material Alternative proposal to deliver of the transmission assets is to utilise the established local energy related development infrastructure. In particular this should involve the Hillhouse Technology Enterprise Zone in Thornton on the Wyre Peninsula.

The **Hillhouse Technology Enterprise Zone (HTEZ)** is a 138-hectare site zoned for industrial and energy-related development. It is well-separated from residential, leisure, and environmental zones and offers streamlined planning processes, as well as extensive utility and highway access infrastructure.

Notably:

- The **Walney 2 offshore wind farm** has been connected to the **adjacent National Grid Stanah substation** via this site since 2012.
- The site provides direct access to the Irish Sea across approximately **2 km of open space**.
- There is capacity for both expansion of the existing Stanah substation and installation of new transmission assets.

Utilising this established infrastructure—via HTEZ, the Stanah substation, and the existing 400kV overhead transmission lines to Penwortham—offers a potentially faster, lower-impact, and lower-cost alternative to the entirely new 30 km underground cable route currently proposed in the application. However, no clear evidence has been presented that this route was adequately considered or assessed.

2. Requested Site Visit Locations

To enable the Examining Authority to evaluate the viability of this materially significant alternative, we request visits to the following key locations:

i) Hillhouse Technology Enterprise Zone (HTEZ), Bourne Rd, Thornton-Cleveleys, FY5 4QP

Purpose:

To evidence the availability of:

- Designated development land for converter stations and substation expansion;
- Utility infrastructure to support construction and operation;
- Direct connectivity to the Stanah 400kV substation;
- The existing Walney 2 transmission substation;
- Potential Irish Sea access via the proposed northern route across 2 km of open land.

Note: The site is on private land owned by NPL and has controlled access. Entry can be facilitated via the contact details provided below.

ii) Fleetwood Road North & Enterprise Way Junction (FY7 8RY)

Purpose:

To observe the:

- Protected route of the proposed northern access road into HTEZ, just south of the prominent white Lancashire Renewables buildings;
- Open land availability for horizontal directional drilling or other compliant cable laying methods from HTEZ to the Rossall Beach Irish Sea shore.

This location is publicly accessible.

iii) Rossall Promenade/Beach (FY5 1LP), adjacent to Rossall School's southern playing fields

Purpose:

To assess the:

- 2 km of open space providing a clear route from the Irish Sea to HTEZ;
- Significantly reduced infrastructure requirements compared to the proposed 30 km cable route.

This area is publicly accessible via the sea wall promenade, approximately 250 m north of the Rossall Promenade car park. Vehicular access is via Thornton Gate or North Promenade, Thornton-Cleveleys.

3. Contextual Note on Existing Grid Infrastructure

It is assumed the Examining Authority has reviewed the **Penwortham substation** and noted its connection to the **twin-circuit 400kV overhead line** extending north-northwest across the Fylde Coastal Plain. This line:

- Directly connects to the **National Grid Stanah substation** (23.5 km away);
- Continues to the **Heysham substation** near Morecambe Bay and the River Lune Estuary.

This existing route demonstrates clear technical viability and system integration potential for the Morgan and Morecambe projects.

Further technical detail can be found in the **National Grid Electricity Ten Year Statement 2024**, Appendix A, Figure A5, showing system zones and groupings. Notably, **Group R4** includes both the Stanah and Penwortham substations, indicating their integrated operational management.

Document link: <https://www.neso.energy/document/351911/download>

4. Conclusion

We believe this proposed alternative route offers a materially lower impact, faster-to-deploy, and more cost-effective solution that has not been sufficiently considered in the current application.

We kindly request that the Examining Authority includes the above sites in its accompanied visits to enable a full and fair assessment of this route. I would be pleased to facilitate access arrangements for the private HTEZ site upon request.

Yours sincerely,

Peter Collins

Chair

Lancashire Association of Local Councils, Fylde Area Committee

Energy Working Group

(LALC FAC EWG)

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