

Lancashire Association of Local Councils Fylde Area Committee Energy Working Group
Interested Party Number - 20053845
COMMENTARY ON WRITTEN REPRESENTATION
REP1-117

REGARDING REPORT OF NGET PLC FREEDOM OF INFORMATION REPLY

PLANNING INSPECTORATE REFERENCE NUMBER: EN020028

Lancashire Association of Local Councils Fylde Area Committee Energy Working Group (EWG) wishes to thank the Examining Authority for providing the author of REP1-117 the opportunity to be able to share their report of a reply to a Freedom of Information Request from National Grid Electricity Transmission (NGET) PLC. The EWG also wishes to thank the author of REP1-117 for securing the response from NGET PLC regarding how they elected to describe their view of the Stanah and Penwortham substations as they perceived the Morgan and Morecambe wind farm projects.

In the material of REP1-117 attributed to NGET PLC, it would appear that NGET was unable or unwilling to show any complete and consistent comparative assessment against relevant criteria.

Such criteria would be expected to consistently consider the whole generation and transmission system for each of the independent Morecambe and Morgan wind farm projects taking account of both the Applicants' and NGET PLC's sub-systems with regard to :

a) Efficiency and Economy as required by the Electricity Act 1989; and

b) the criteria set out in the Offshore Transmission Network Review (OTNR) of

i. Cost to consumers.

ii. Deliverability and operability.

iii. Impact on the environment.

iv. Impact on local communities

that the Holistic Network Design Review (HNDR) claimed it followed, but did not present in the HNDR report;

c) or even the criteria NGET PLC stated in the FoI response reported in REP1-117, but then omitted to use in its reply:

i. location,

ii. project requirements,

iii. network resilience,

iv. cost,

v. environment and

vi. the capacity of our existing infrastructure.

None of these criteria were shown to have been applied consistently, nor completely in a comparative assessment of NGET PLC's Stanah and Penwortham substations for linking the independent Morgan & Morecambe offshore generation assets with Penwortham and beyond to the consumer.

In addition and critically, NGET PLC's statements in REP1-089 concerning: the conflicts that NGET PLC continues to have with the Applicants' proposals; and the extensive upgrades and extensions required at the Penwortham site located within designated Green Belt to enable the

existing infrastructure to be capable of connecting the Morgan and Morecambe wind farm and other projects, evidences the inadequacy of NGET PLC's reported assessment provided in REP1-117.

By contrast, Stanah, similarly connected to the high voltage national grid network, already connects the Walney2 offshore wind farm to that network. It has direct access to extensive land designated to support energy related development in the adjacent 138 hectare Hillhouse Technology Enterprise Zone (HTEZ) site. This evidently offers a more Efficient and Economic connection point to link with Penwortham and beyond to consumers, with already demonstrated deliverability and operability.

By the utilisation of the established infrastructure including NGET PLC's 400kV twin circuit overhead line (reference : VF 400kV OHL Heysham-Penwortham-Stanah1 Heysham-Penwortham-Stanah 2 in REP1-117), the Morecambe and Morgan projects would avoid the increased time, risk and costs of creating two independent sets of 30km of undergrounded cabling to link the Irish Sea shore on the Fylde coastal plain with Penwortham in the West Lancashire plain. Using the costings in the latest "Comparison of Electricity Transmission Technologies: Costs and Characteristics - An independent report by Mott MacDonald in conjunction with the IET Institute of Engineering and Technology" issued in 2025

[REDACTED], adoption of this approach would suggest savings of some £904,000,000 by this adoption of the approach of utilisation of established energy infrastructure.

Stanah/HTEZ includes network resilience options of: substation expansion space; local power consumption by energy intensive sectors attracted to HTEZ reducing network capacity requirements; hydrogen based energy balancing infrastructure proposals; and multiple high voltage circuit route growth.

Stanah offers a location immediately adjacent to the 138 hectare HTEZ site, nationally approved for energy developments, with its already provisioned utilities and highways access facilities. This facilitates both any expansion for NGET PLC network infrastructure requirements, as well as hosting both Morgan and Morecambe onshore substations, independently. This is compliant with the National and Local Development Framework, removing unacceptable environmental and community impacts. By contrast the Applicants' non-compliant proposals have to chosen to propose development of substations on community critical Green Belt land and conflicts with maritime and land environmental protection zones.

In addition, via HTEZ, Stanah's location gains access to the Irish Sea across only 2km of open space, offering multiple environmental and community compliant construction options. This avoids the order of magnitude greater construction works required to link Penwortham with the Irish Sea with the Applicants' proposals involving 60km of two independent undergrounded cable route sets and separated substations to be located by choice on community critical Green Belt.

Stanah/HTEZ delivers a faster, cheaper lower risk solution to linking transmission assets from the Irish Sea to Penwortham, delivering Morgan and Morecambe project requirements in an enhanced manner, delivering the lowest cost to the consumer in comparison to the Applicants' proposals.

By complete and consistent assessment against all the criteria, Stanah/HTEZ as the link to Penwortham and beyond to the consumer, offers fully compliant, superior economy and efficiency, to deliver the lowest cost to consumers in comparison with the Applicants' non-compliant current proposals.

For Ease of Reference REP1-117 is reproduced below, followed by a point by point assessment :
Link to REP1-117 :

105 <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020032/EN020032-001019-Brian%20Harrop%20-%20Written%20rep.pdf>

Submission ID: 36153

Connection to the National Grid.

110 During the preliminary hearings the Applicants stated they had no choice in deciding upon Penwortham as the connection point. This seemed an area of contention with legal representatives of Parish councils (and a query from the Chair). There seemed to be issues with the Grid's use of the words "preferred" route and that the Applicants "substantially" had no decision. I raised this issue with the National Grid back in December - via a Freedom of Information request - and received the reply below. It seems to me that the Applicants are

115 correct in that the Grid has the responsibility to decide on the connection point. "Thank you for your message. As part of our legal obligation to facilitate new connections to the network, it is our responsibility to identify the most suitable connection point based on factors such as location, project requirements, network resilience, cost, environment and the capacity of our existing infrastructure. Penwortham and Stanah substations have different roles within our electricity network and for Morgan and Morecambe's proposed

120 projects, Stanah is currently not best placed to accommodate these connections. Stanah is a small substation that has primarily been designed to step down the power from higher voltage transmission lines to lower voltage lines, so that it is ready to be distributed to consumers. Penwortham is much larger in comparison and is part of our high-voltage transmission network, which is able to connect power generation sources, such as wind farms, to the network. Unlike Stanah, Penwortham substation currently has the flexibility and

125 capacity on-site to facilitate Morgan and Morecambe's connection requests."

	Text from relevant representation of the Author of REP1-117 (Bold Text below applied to highlight particular features)	LALC FAC EWG Notes on report of NGET PLC's Freedom of Information request reply in REP1-117	
1	Submission ID: 36153 Connection to the National Grid.		
2	During the preliminary hearings the Applicants stated they had no choice in deciding upon Penwortham as the connection point. This seemed an area of contention with legal representatives of Parish councils (and a query from the Chair). There seemed to be issues with the Grid's use of the words "preferred" route and that the Applicants "substantially" had no decision. I raised this issue with the National Grid back in December - via a Freedom of Information request - and received the reply below. It seems to me that the Applicants are correct in that the Grid has the responsibility to decide on the connection point.		
3	"Thank you for your message.		

4	<p>As part of our legal obligation to facilitate new connections to the network, it is our responsibility to identify the most suitable connection point based on factors such as location, project requirements, network resilience, cost, environment and the capacity of our existing infrastructure.</p>	<p>It is of note that there is no explicit reference to National Grid Electricity Transmission (NGET) PLC's Electricity Act 1989 obligations for economy and efficiency; or to the Offshore Transmission Network Review (OTNR) criteria that were supposed to have been used in Holistic Network Design Review (HNDR) of cost/deliverability/environmental impact/community impact, or showing the evidence of any comparison between the connection points considered.</p> <p>In the Freedom of Information request (FoI) response by NGET PLC as reported by the author of REP1-117, the terms : location, project requirements, network resilience, cost, environment and the capacity of our existing infrastructure are stated as factors, but then are not objectively or consistently referred to in any comparison between Penwortham and Stanah in the context of connecting either or both of the Morgan or Morecambe generating assets to the consumer.</p> <p>Instead the FoI answer seems to be essentially about the size and flexibility of Penwortham in comparison to Stanah. Given NGET's comments about Morgan's and Morecambe's Applicants' proposals, this doesn't seem to stand up to any professional scrutiny and definitely not when compared to Stanah's direct access to the 138 hectare Hillhouse Technology Enterprise Zone (HTEZ) site.</p> <p>It is noted that in National Grid Electricity Transmission (NGET) PLC's Written Representation Rep1-089, even 3 years after the publication of the HNDR Report, NGET would appear to have an extensive description of enduring concerns regarding the cost, deliverability, environmental and community impact that the Applicants' proposals have on NGET's existing and anticipated assets at and around their Penwortham substation, including potentially involving compulsory acquisition of additional land. The HNDR report text is silent about any reference to Stanah. Yet Stanah is the closet and most accessible connection point to the Irish Sea on the Fylde Coastal Plain.</p> <p>This would suggest that the HNDR assessment is – at best – out of date e.g. that there have been further emergent projects impacting access to the site subsequent to the HNDR; and/or perhaps that the HNDR did not fully consider the appropriate level of detail before NESO/NGESO recommending Penwortham as a connection point. This follows the Applicants' submission to NESO of a proposal that would share a single substation site, landfall and cable corridors. The DCO submission however involves separated substation location, landfall and cabling schedules with the commensurate adverse intensification & duration of impacts and cost increases. NGET PLC Representation is silent on ensuring the lowest cost to the consumer, reflecting its focus on NGET related impacts rather than taking a system view for economy and efficiency as indicated by the Electricity Act 1989 and Energy Act 2023.</p> <p>This can only be further conflicted by the emergence of the Mooir Vannin NSIP project, which claims to be connecting with the national grid network to provide power between 2032</p>
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		and 2033 according to the developer Orsted's East Irish Sea Transmission Project website link - https://eastirishseatransmissionproject.co.uk/faqs .	
5	Penwortham and Stanah substations have different roles within our electricity network and for Morgan and Morecambe's proposed projects, Stanah is currently not best placed to accommodate these connections.	<p>It is noted that the reply uses "currently" in respect of the attractiveness of Stanah. Stanah already connects the Walney2 Offshore Wind Farm to the national grid network and on to consumers. It has done so since 2012. Its plant and equipment is presumably economically and efficiently sized for the historical demand.</p> <p>In addition Walney 2's onshore converter substation is hosted on the 138 hectare Hillhouse Technology Enterprise Zone (HTEZ). This demonstrates the feasibility and availability of land for hosting energy infrastructure, a key purpose in the national approval of its status as an Enterprise Zone. The NGET Stanah functionality could therefore logically be expanded onto the HTEZ site.</p> <p>It is observed that the principal owner of the HTEZ site, NPL, has invited the Examination Authority to visit the site to evidence its suitability (REP1-187)</p> <p>By way of comparison, it would appear that "currently" Penwortham is not best placed to accommodate these connections. In the afore mentioned NGET Representation, there is an extensive description of the multiple significant enduring conflicts with the Applicants' proposals regarding Penwortham's suitability to accept connections for the Morgan and Morecambe wind farm projects. There seem to be multiple issues regarding conflicts with NGET assets, and Penwortham requires additional plant and equipment to accommodate the increased capacity and functionality required in connecting with these projects. This will presumably be further exacerbated by consideration of how the Mooir Vannin project should that be connected at Penwortham.</p>	
6	Stanah is a small substation that has primarily been designed to step down the power from higher voltage transmission lines to lower voltage lines, so that it is ready to be distributed to consumers.	<p>It is noted that the NGET PLC's reply uses "primarily" in respect of the attractiveness of Stanah.</p> <p>As highlighted above Stanah also performs the core function of connecting the Walney2 Offshore wind farm stepping the voltage up to the 400kV national grid network and distributed to consumers.</p> <p>Stanah has been the subject of being on the preferred shortlisted connection point for multiple offshore generation and transmission projects to be landed on the Fylde coastline e.g.</p> <ul style="list-style-type: none"> • UK Offshore Energy Strategic Environment Assessment (SEA) • North West Coast Connection (NWCC) • Celtic Array • Walney Extension Offshore Wind Farm • Walney 2 Offshore Wind Farm • Isle of Man – England Inter-connector <p>Stanah has been the connection point for the Walney 2 Offshore Wind Farm since 2012.</p> <p>Stanah has adjacent space to expand at the HTEZ.</p>	

7	<p>Penwortham is much larger in comparison and is part of our high-voltage transmission network, which is able to connect power generation sources, such as wind farms, to the network.</p>	<p>As detailed in NGET PLC's Written Representation Rep1-089 Penwortham requires extensive upgrades to meet further power generation connections including the Morgan and Morecambe wind farms to the network. The nature, scale, complexity and interactions associated with the yet further connection upgrades expected for the NSIP Mooir Vannin East Irish Sea Transmission Project are not referenced in Rep1-089.</p> <p>Stanah is already part of high voltage transmission network. Rep1-089 refers to the overhead line dual circuit direct connections between Penwortham, Stanah, Heysham and beyond at section 2.1 (g) "VF 400kV OHL Heysham-Penwortham-Stanah1 Heysham-Penwortham-Stanah 2". In section 2.1(f) potential supplementary linkage infrastructure between Penwortham and Stanah is provided via ywin circuit 400kV overhead line "ZQ 400kV OHL Heysham-Hutton=Penwortham 1 Heysham-Hutton-Penwortham 2".</p> <p>Stanah has been the subject of being on the preferred shortlisted connection point for multiple offshore generation and transmission projects Fylde coastline in preference to Penwortham. Examples of this are listed above.</p> <p>Stanah has access to expand on immediately adjacent space on the nationally approved 138hectare HTEZ site, specifically designated to support energy projects.</p>	
8	<p>Unlike Stanah, Penwortham substation currently has the flexibility and capacity on-site to facilitate Morgan and Morecambe's connection requests."</p>	<p>Stanah's site location has great flexibility to facilitate Morgan and Morecambe's connection requests as it is adjacent to the 138 hectare HTEZ. This was noted as early as 2008 in National Grid's input to the UK Offshore Energy Strategic Environment Assessment (SEA). Stanah's location thus offers great opportunity to create undertake development with efficiency and economy, avoiding the additional risk, time and costs associated with implementing two completely new independent cable routes of 30km each between the shores of the Fylde Coastal Plain to the West Lancashire Plain in which Penwortham is located.</p> <p>Penwortham is the subject of significant and complex required expansion, including potentially requiring further compulsory land acquisition as detailed in Rep1-089, so the current functional and physical capacity of the Penwortham site is clearly insufficient as reported in NGET's written representation. This also details the multiple enduring unresolved matters at conflict with facilitating Morgan and Morecambe's connection requests."</p>	