

APPLICATION BY MORGAN AND MORECAMBE OFFSHORE WIND FARMS TRANSMISSION ASSETS SCHEME

PLANNING INSPECTORATE REFERENCE NUMBER: EN020028

REGISTRATION IDENTIFICATION NUMBER: 20053776

Responses of National Grid Electricity Transmission plc to ExQ1

ExQ1	Question to:	Question:	
Q1.1.6	National Grid Electricity Transmission plc (NGET)	<p>Penwortham substation</p> <p>Paragraph 3.7 of the written representation from NGET [REP1-089] sets out upgrade works that are proposed to be implemented at the existing Penwortham substation including the 'Eastern Extension', 'Upgraded Infrastructure' and Network Rail connection works.</p> <p>a) Can NGET provide further details, including any publicly available information, of the form and extent of works that are proposed at Penwortham substation comprising the 'Eastern Extension', Upgraded infrastructure' and the 'Penwortham Project'?</p> <p>b) Can NGET provide details of the current timescales for the implementation of these works and any consents or approvals that would be required?</p> <p>c) From the information that is currently known, what implications might these works have for the proposed development, including the layout of the proposed development</p>	<p>a) Not at this time.</p> <p>b) NGET need to submit an application under the Town and Country Planning Act 1990 for the Eastern Extension and are working towards Q4 2025. Work is to commence on site pending this approval. It is anticipated that some enabling works will commence on site, within the operational compound next year where works will be carried out under permitted development.</p> <p>c) NGET works are required for the connections to be made, the intention is for the parties to work together to enable</p> <p>d) NGET requires the protective provisions that have been submitted as part of its written representation [REP1-089]. The NGET protective provisions provide for the protection of future infrastructure (paragraphs 3 – 7) which has not been included in the most recent form of draft DCO submitted by the Applicant at Deadline 2. Without this wording, NGET projects cannot be protected. The NGET protective provisions along with related confidential agreements with the Applicants would resolve its concerns regarding the proposed development at Penwortham substation. Which is standard procedure for this type of project.</p>

		<p>including, but not limited to, construction compounds (Plot 18-054), highway, access and visibility works (Works Nos. 34 and 19A) and the timing of delivery of the proposed development?</p> <p>d) Is NGET satisfied that protective provisions (as appropriately drafted) are capable of resolving its concerns regarding the proposed development at Penwortham substation.</p> <p>e) Could NGET also provide details of the new bay that would need to be constructed on the western side of the existing substation to accommodate the Morecambe connection (paragraph 3.2 of <u>REP1- 089</u>).</p>	<p>A statement has been prepared and agreed between NGET and the Applicants with regards to the progress made on the protective provisions and the accompanying confidential side agreements which is being submitted by the Applicants at Deadline 3.</p> <p>e) Not at this time.</p>
Q1.1.13	<p>The applicants, local authorities, statutory consultees and relevant statutory undertakers where a SoCG has been previously requested in the ExA's Rule 6 letter.</p>	<p>Statements of Common Ground (SoCG)</p> <p>Deadline 3 (7 July 2025) includes the submission of updated SoCG, including summaries of the principal areas of disagreement and statement of commonality.</p> <p>Relevant parties where a SoCG has been requested should fully engage with the SoCG process. The ExA requests fully considered SoCGs including summaries of the principal areas of disagreement.</p> <p>For statutory undertakers, where there is documented evidence that matters, including protective provisions, are agreed and no other matters of disagreement remain, then a statement from parties to this effect would suffice. In the absence of such a statement, where protective provisions are being negotiated and even if agreement is expected to be reached, then a</p>	<p>NGET Agree we can enter into a SoCG</p>

		brief and focused SoCG or position paper should be progressed, focusing on the matters where differences remain between the respective parties, rather than an unnecessarily long SoCG. It is not sufficient for these to be just recorded in the applicants' Land Rights Tracker as this is not a document that is necessarily agreed with the relevant statutory undertaker.	
Q1.2.1	NGET	<p>Stanah/ Hillhouse suggested alternative</p> <p>Several interested parties including Lancashire Association of Local Councils Fylde Area Committee Energy Working Group (EWG) [REP1-083] and Newton with Clifton and Freckleton Parish Councils (NCFPC) [REP1-183] have suggested an alternative onshore connection for the Morecambe and Morgan projects using the established Stanah substation (to be extended) and Hillhouse Technology Enterprise Zone and the upgrade of the existing 400kV twin circuit overhead line connecting Stanah with Penwortham, which it is suggested, would offer cost savings and reduced disruption.</p> <p>a) NGET comments are sought for this suggested alternative, including its potential feasibility for connecting the Morecambe and Morgan projects, including utilising the existing Stanah substation (as extended) and the use (with potential upgrade) of the existing 400kV twin circuit overhead line between Stanah and Penwortham.</p> <p>b) What other options were considered in deciding upon the onshore grid connection for</p>	<p>a)</p> <p>The connection point for both Morgan and Morecambe's wind farms was decided in line with the National Energy System Operator's (NESO) Holistic Network Design (HND) process.</p> <p>When a connection request is submitted to NESO, a number of factors are considered to determine the most suitable connection point to facilitate the request. This includes the type of power the project is generating and load requirements, alongside ensuring network resilience and the capacity of our existing infrastructure.</p> <p>In addition, as part of the terms of reference for the HND, the connection point also has to consider four key design principles. This includes minimising environmental impact, minimising community impact, ensuring it is deliverable and operable, and that the connection point is economic and efficient.</p> <p>For Morgan and Morecambe's wind farms, there are several physical and technical constraints preventing us from connecting them to Stanah Substation.</p> <p>To connect these wind farms at Stanah, we would need to install additional equipment, significantly increase the size of the substation, and construct a new overhead line. However, Stanah is a small substation located in a</p>

		<p>the Morecambe and Morgan projects and why were these not taken forward?</p> <p>residential area that due to the neighbouring homes does not have the capacity or flexibility on site to enable us to do this work.</p> <p>To ensure we align with the four design principles set out in the HND's terms of reference, we always consider the capacity of our existing infrastructure, as well as demand, before building anything new.</p> <p>We have not proposed building a new substation in Stanah on the Hillhouse Technology Enterprise Zone to facilitate Morgan and Morecambe's connections for a number of reasons. This includes:</p> <ul style="list-style-type: none"> • We do not currently have any connection requests in the pipeline for Stanah that demonstrates the need or demand to build an additional substation in this area. • If, Morgan and Morecambe did connect at a new substation in Stanah the overall impact on the environment and community would be significantly greater. This is because in addition to NGET needing to construct a new substation in a residential area, a new high voltage overhead line to transmit the power to Penwortham would also be required. • While the cabling from Morgan and Morecambe's wind farms to Stanah would be shorter than it directly cabling to Penwortham, the new overhead line that would be needed in addition to the cabling would make the overall route for the connection longer and in turn less efficient and cost effective. • Morgan and Morecambe's cabling to the new substation, a new high voltage overhead line to transmit the power to Penwortham would also be required – making the overall route for the cabling and overhead line longer and costly. • A new overhead line would be required to enable connection to the existing substations.
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			<ul style="list-style-type: none"> Construction of a new substation at Hillside would take approximately 6-7 years. This would not comply with current Commercial Load Dates for Morgan and Morecambe. To build a new substation at Hillside, siting studies would need to be conducted which would take 1-2 years to enable the constructability of the substation, the outcome of which might conclude that this was not a suitable location for a substation, accumulating further delays to construction and connections. <p>b) An overview of the existing substations considered by NESO for this connection can be found on pages 151-153 of this document: https://www.neso.energy/document/262681/download</p>
Q1.2.2	The applicants and NGET	<p>Stanah/ Hillhouse suggested alternative</p> <p>The applicants and NGET are requested to comment on the additional submissions by EWG [REP2-059] and NCFPC [REP2-064] regarding the suggested alternative onshore connection, including the comparative assessment of costs.</p>	Please see above.
Q5.1.22	The applicants and National Grid Electricity Transmission plc (NGET)	<p>Morecambe connection to Penwortham substation</p> <p>The position concerning the exact route of the proposed connection for the Morecambe project is not currently clear to NGET [paragraph 3.14 of REP1-089] and clarity is sought for this? NGET indicate at paragraph 3.2 that the Morgan connection is to be to the east of the substation and the Morecambe connection to the western side.</p> <p>a) Explain why separate connections are required and, if appropriate, update the draft DCO to reflect this?</p>	<p>a) While Morgan and Morecambe are seeking consent for a shared corridor for their onshore cabling to Penwortham Substation, they are separate projects that have different technical requirements and connection dates for their projects. Morgan will have a generating capacity of 1,500 megawatts (MW), whereas Morecambe will have a generating capacity of 480 MW.</p> <p>To facilitate these connections and effectively balance these loads on our network, we have allocated bays to Morgan and Morecambe based on the capability of our existing equipment at Penwortham Substation. In this instance, it means the two separate projects will be connecting on different sides of the substation.</p>

		<p>b) Please also provide the summary of the connection agreements as requested at ISH1?</p>	<p>b) NGET are unable to share the Connection Agreements. However, these connections are confirmed on the <i>Transmission Entry Capacity (TEC) register</i> (https://www.neso.energy/data-portal/transmission-entry-capacity-tec-register). An extract of the TEC register, downloaded on 7 July 2025, is available at Appendix 1.</p>
Q5.1.24	NGET	<p>Penwortham substation</p> <p>As the applicants say in section REP1-089.3 of their D2 response [REP2-031], “Given the significant works identified for the Penwortham substation it is notable that NGET are not definitive on this. As NGET’s own plans at Penwortham are not currently in the public domain and may be subject to change...” This results in the applicants retaining the flexibility to connect to either side of the substation. Please can NGET provide some clarity so that the applicants can be more certain with their own requirements and the cable route as it connects to the NGET substation?</p>	<p>The parties will continue to engage with each other to provide the necessary details.</p>
Q5.1.25	NGET	<p>National Grid</p> <p>National Grid makes reference to the Horlock rules at section 4.3 of the Environmental Statement Annex 4.3: Selection and Refinement of the Onshore Infrastructure [APP-033]. The suggestion has been made that these rules have not been followed [REP1-125 and REP1-153].</p> <p>a) NGET are requested to respond to this</p>	<p>a) NGET confirms the Horlock rules are the correct rules, as to their application, it isn’t appropriate for NGET to comment. NGET were not involved in the preparation of the Environmental Statement as it is an applicant’s document, it is not for NGET to justify if they have complied with Horlock rules but the applicant.</p> <p>b) NGET intend to submit a TCPA application for the Eastern Extension and are working towards Q4 2025.</p>

		b) Please also confirm whether the linked planning application for Penwortham substation is still scheduled to be lodged in the final quarter of 2025?	
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Appendix 1

Extract of TEC register downloaded on 7 July 2025

Project Name	Customer Name	Connection Site	Stage	MW Connected	MW Increase / Decrease	Cumulative Total Capacity (MW)	MW Effective From	Project Status	Agreement Type	HO ST TO	Plant Type	Project ID	Project Number
Isle of Man Offshore Wind Farm	Moor Vannin Offshore Wind Farm Limited	Penwortham 400kV Substation		0	1320	1320	##### ###	Scoping	Direct Connection	NG ET	Wind Offshore	a018e000000ex1KAAQ	PRO-003698
Morecambe Offshore Wind Farm	MORECAMBE OFFSHORE WINDFARM LTD	Penwortham 400kV Substation		0	480	480	##### ###	Scoping	Direct Connection	NG ET	Wind Offshore	a014L0000005ibwQAA	PRO-001450
Morgan Offshore Wind Farm	Morgan Offshore Wind Limited	Penwortham 400kV Substation		0	1500	1500	##### ###	Scoping	Direct Connection	NG ET	Wind Offshore	a014L0000005ik5QAA	PRO-001594
Penwortham BESS	CSE28 LIMITED	Penwortham 400kV Substation		0	57	57	##### ###	Scoping	Direct Connection	NG ET	Energy Storage System	a014L0000005ibBQAAQ	PRO-002037
Penwortham BESS	PENWORTHAM (BES) LTD	Penwortham 400kV Substation		0	57	57	##### ###	Scoping	Direct Connection	NG ET	Energy Storage System	a014L0000005iuXQAAQ	PRO-001804
Penwortham Green Energy Centre	PENWORTHAM GREEN ENERGY LIMITED	Penwortham 400kV Substation	1	0	400	400	##### ###	Awaiting Consents	Direct Connection	NG ET	Demand; Energy Storage System; PV Array (Photo	a014L0000005ierQAA	PRO-001694-1

											Voltaic/solar)		
Penwortham Green Energy Centre	PENWORTHAM GREEN ENERGY LIMITED	Penwortham 400kV Substation	2	0	200	600	##### ###	Awaiting Consents	Direct Connection	NG ET	Demand;Energy Storage System;PV Array (Photo Voltaic/solar)	a0l4L0000005ierQAA	PRO-001694-2