

Morgan and Morecambe Offshore Wind Farms Transmission Assets

DCO Application Reference EN020032

Submission from Newton & Clifton & Freckleton Parish Councils

Further Comments Regarding the Applicant Responses contained in REP1-039 and REP2-035

Overview

This paper responds to key matters that the Applicants continue to avoid addressing in their lack of evidencing of a consistent economic and efficient assessment of the choice they made to connect 30km inland to Penwortham substation, in preference to utilising existing infrastructure via Hillhouse Technology Enterprise Zone (HTEZ) or the nearby Stanah substation, notably in REP1-039.

Any proposal that fails to examine the potential for use of existing National Grid Hardware, which should be compliant with the current NESO Security and Quality of Supply Standards (SQSS) requirements, must fall short of the objective and must be questioned as to whether it can meet the test of an efficient and economic system from generator to consumer required by the Electricity Act 1989 and regulated by Ofgem as required to be the lowest cost to the consumer.

The least harmful option must be that which adopts the shortest, most cost-effective possible route to achieving a land connection to the National Grid, avoiding unacceptable, unsustainable, adverse impacts on the environment, communities and economies.

The Applicant has failed to show the most basic assessment of alternatives.

The proposal raises the question of how implementing two entirely new sets of infrastructure—requiring 30km of independent cabling trenches to an inland National Grid PLC substation—constitutes an efficient and cost-effective system from generator to consumer, especially when compared to leveraging and upgrading the existing transmission infrastructure located less than 5km from the Irish Sea. This accessible site benefits from an adjacent 138 hectares of designated development land that already accommodates offshore wind transmission infrastructure.

Furthermore, the Applicant intends to establish multiple independent transmission substation sites on protected Greenbelt land, which conflicts with the Nationally Approved Local Development Plan, citing “Very Special Circumstances” as a justification.

This application fails to achieve that most basic required goal. It is not sufficient to claim that NESO required the connection to be made to Penwortham, and simply allow taxpayers and electricity bill payers to pay an additional sum of hundreds of millions of pounds, environmental effects to be multiplied tenfold and two enormous substations to be built on agricultural land close to communities unnecessarily.

Legal Considerations for Alternatives Assessment

Our contention is that the Applicant has failed to demonstrate that their proposal is the least harmful option that they have considered, as laid out in our previous representations (references RR-703, RR-704, RR-1261, RR-1615 and RR-1616).

The option proposed might have been the cheapest from a National Grid/NESO viewpoint when the project commenced, but it certainly does not represent the most cost-efficient solution overall under the current requirements placed upon the Applicants, National Grid, NESO and Ofgem in the Electricity Act 1989 Section 9 (General duties of licence holders - “to develop and maintain an efficient, co-ordinated and economical system of electricity transmission”).

Using the best available information and, recognising the caveat applied to that source, the indicative saving is of the order of £900 million.

The Applicants impinge protected areas (Ribble RAMSAR in two places, Protected Habitats and Green Belt land) quite extensively, creating a range of issues as a consequence, including that of the increased bird strike risk. Indeed, the Applicant appears to have adopted a conflicting stance on environmental protection, simultaneously seeking to play up the environmental benefits for biodiversity purposes and play them down for bird strike risk issues.

Consequently, we would suggest that there is urgent need for consideration of an alternative that avoids these issues, one of which, at least, being intractable, i.e. bird strike.

Holistic Network Design (HND) Process & Point of Interconnection

The descriptions by the Applicants, captured in the HNDR of the processes adopted in seeking to comply with the Electricity Act 1989 (section 9) “to develop and maintain an efficient, co-ordinated and economical system of electricity transmission”, would suggest that there was a failure to update the initial assumptions relating to the Northwest area of England for the Holistic Network Design Review (HNDR) process. They failed to use local knowledge available to National Grid and the wider offshore wind energy sector in the selection process and recognise the proximity of a new Nationally approved Technology Enterprise Zone, which was established with an energy infrastructure bias, with all that this implies for development activities.

A word search of the HNDR using AI reveals that Stanah is never mentioned in this report. Much earlier project searches (2014) did conclude that Stanah was the closest Grid point to the Irish Sea Coast, but investigation still showed that the possibility of access via Rossall Beach was missed and that these searches pre-dated the designation of Hillhouse, the old ICI plant at Thornton, as a Technical Enterprise Zone in March 2016. This freed access to the North of Stanah.

In REP1-039 the Applicants allege (at 4.1.1.3 and footnote 11) that it is their responsibility to “accept a grid connection offer” and that they now claim at REP1-039 3.4.1.10 “Although the HND process was led by NESO, the Applicants were engaged in the process (as was NGET). The Applicants expressly raised Stanah, Middleton, Kirkby and Penwortham as possible connections for consideration”. Yet they still fail to produce the assessment that yielded those grid connection point questions in addition to or maybe even in preference to Penwortham. Nor does the Applicant present what consistent, complete and compliant process and results led them to choose to connect to Penwortham, by

creating some multiple lengths of 30km of new undergrounded cabling route to an inland substation, rather than utilising the existing transmission and development land infrastructure.

It would appear from the Applicants' response that NESO offered a connection point, but that the Applicant was engaged in the process and accepted the offered solution, apparently without securing the evidence as to why their questions of the suitability of connecting via Stanah, Kirby or Middleton were seemingly unresolved by a compliant, consistent and transparent assessment. The result is the current plan for a buried route requiring parallel 30km length cable trenches/tunnels.

The Applicants' response (in REP1-039 paragraphs 4.1.1.3 and 3.4.1.10) states that they were a party to the decision process and had responsibility for accepting the decision but were not responsible for the decision itself. This is the generation of a Customer-Supplier agreement between the parties in which both parties share responsibility by one making a proposal and the other then accepting and if this is not so, there is a further round of discussion until agreement is reached.

Whilst the current National Grid held land at Stanah itself might be limited to cover all role expansion options, the adjacent 138 hectare TEZ at Hillhouse offers enormous development space for hosting substations for Irish Sea Wind Farms and for National Grid. The closest point of connection to the main grid system is at Stanah, which is where the existing 400kV Tee junction taken off the grid at Hambleton arrives.

Finding a solution that allows connection to the Grid at the nearest possible 400kV point to the coast has to be the most cost-effective overall solution, especially when combined with the simplest engineering and use of as much existing National Grid infrastructure as possible. This is supported by the comparative costings of the latest 2025 IET publication on Transmission Technologies.

The implication that the proposed route cannot cope with their power is overstated (REP1-039 paragraphs 3.5.1.7 and 3.5.1.8). The Transmission line from Hambleton to Penwortham is part of the existing main grid and if that cannot cope, then neither can the lines to the south or east from Penwortham. Care was taken to confirm the capability of the line by having expert power engineer advisors look at the alternative proposal before submitting the idea.

The material alternative route of connecting to Penwortham and beyond to consumers, via HTEZ and Stanah recognises the need for either a rebuild or, more likely new substations at Hillhouse. This HTEZ site has the space for new infrastructure and the principal site landowner (NPL Group) who would welcome the development, as stated in their representation (reference REP1-187). It is noted that National Grid in their representations of concerns relating to the Applicants' proposals detail multiple upgrades and even new land acquisitions to respond to expanding transmission demands in REP1-089 section 2. It is of note that even this list of projects did NOT include provision for the NSIP status East Irish Sea Transmission Project associated with the Mooir Vannin Offshore Wind Energy project. It is logical that if requirements change, the existing system will be required to be modified.

The cost differential that was provided in REP2-064 took all of this into account.

Legal Framework for Considering Alternatives

The described legal framework (see REP1-039 1.3.1.3) agreed between NESO and the Applicant may even be a potential source of the current issue. The agreement clearly defines what facility belongs to which party. This implies that Applicants' onshore transmission system terminates with each windfarm having a substation to convert the power to the correct voltage and quality to allow for connection. This output then travels by cable to a NESO substation for that connection to be made.

Logically the simplest interface would be to have the Applicants' power arrive at the substation, being processed to the correct power quality and voltage, before becoming the output of the substation fed directly to the Grid, with appropriate switching protections included. The interface then lies within a single substation unit where the output is owned by NESO.

Does the current design imply a duplication of effort? If the power is at the right condition, surely all that is needed is a "big switch" and that should be as close to the grid as possible, or should the interface be within the substation itself, between the input at one condition and the output leaving at the required condition, with the interface defined by an Interface Control Document which defines both project and engineering design splits and the agreed interfaces in detail?

Cable Routing and Substation Siting

The Applicants' response refers to the fact that "viable alternatives for routing and siting could be material considerations" (REP1-039 2.1.1.5). Despite the protestations otherwise, no hard evidence has yet been presented to show that their proposal fully meets their design requirement and the proposed alternative does not.

They infringe upon protected areas (Ribble RAMSAR in two places, Protected Habitats and Green Belt land) extensively, creating a range of issues resulting from this, including that of increased bird strike risk. How is that supposed to be compliant?

It seems they simply have not looked.

Even in Para 3.5.1.7 of their submission Ref REP1-039, there is an acceptance that alternative designs were possible but which have just been dismissed, without evidence being presented. This appears to be driven solely by the chosen and accepted Point of Interconnection, yet they have presented no evidence as to the assessment of why their three choices of Stanah, Kirby and Middleton were rejected. No work is reported which indicates that this is indeed the most cost-effective overall solution.

It feels as if the concepts and possible alternatives have not received adequate assessment in the hurry to get the project moving forward. There has instead been reliance on old and out of date information for the initial desk top analysis and a failure to examine the potential offered by the change in status of the Hillhouse facility and its revised and redesignated TEZ status.

It is understood that developers are required to sell on their investment in Transmission Assets to third party Offshore Transmission Operators (OFTOs). It may be that as a result the Applicants have prioritised other matters than their legal obligations "to develop and maintain an efficient, co-ordinated and economical system of electricity transmission". As such they expose the Secretary of

State and themselves to legal challenge, with the resultant prospect of delays, additional costs and potentially having to redesign and reapply for the project.

Benefits of Coordinated Approach

So far, it has been difficult to establish what benefits accrue from the vaunted “Coordinated Approach”. It might be beneficial to the planning submission process, but the evidence suggests that there is no benefit to the local economy or people affected by the proposed route. Indeed, they have articulated a need for physical separation of the deliverables and spend profiles of each project so the timescale differences become substantial when related to the impact on the locality through which the projects pass. There is no benefit to those most impacted.

The claim that this is a special project and a first is frankly both laughable and somewhat insulting, given the experience that exists locally, both in the Fylde and Lancashire, of dealing with complex products resulting from multi-national enterprises, represented by competitor companies and Nations with differing objectives and requirements, who have learned how to manage such projects and deliver their products to their relevant Customers.

Had they needed instruction on how to do this, they could perhaps have asked some of the local expertise and advice.

Conclusions

Overall, we maintain the following conclusions:

1. That the original HNDR process failed to update the base assumptions adequately and did not account for local knowledge and geography.
2. The Applicants are now proposing an approach that is at significant variance to that which led to NESO’s recommendation of HNDR, yet the Applicants have not evidenced that they have reappraised the assessment. They now propose two projects will adopt independent timeframes, cable routes and two substation sites, rather than a single site. As a result, this will materially intensify and increase the scale of adverse impacts on environment, communities and economies.
3. The Applicant’s proposal has been shown to be non-compliant as it unnecessarily infringes on Protected Areas, vulnerable biological sites and Green Belt land, without demonstrating that there is no alternative
4. There is a material viable alternative which should be assessed properly before casual dismissal, as it offers significant savings.
5. The engineering changes required are assessed as all within existing engineering capabilities and are relatively simple.
6. The coordinated approach now adopted offers no benefit to anyone but the applicant team engaged in the initial DCO activity.