

8th August 2025

**Lancashire Association of Local Councils Fylde Area Committee Energy
Working Group**

Interested Party Number - 20053845

5 Written Submission Arising From ISH2 Agenda Item 12 on
 Update on Cumulative Effects Assessment and
 Interrelationship With Orsted's East Irish Sea Transmission Infrastructure
 With Regard To The
10 Proposed Morgan And Morecambe Offshore Wind Farms Transmission Assets
 Development Consent Order

PLANNING INSPECTORATE REFERENCE NUMBER: EN020028

My name is Peter Collins, I am Chair of the Lancashire Association of Local Councils
Fylde Area Committee Energy Working Group (EWG).

15 I was unable to make an oral submission regarding Item 12b "Interrelationship with
East Irish Sea project (i.e. Mooir Vannin)" on day 2 of the Issue Specific Hearing 2
(ISH2) due to time constraints. My comments also relate to Item 12a "Cumulative
effects assessment" and reflect a number of updates since ISH2.

20 Since the ISH2, Orsted has now published its latest two route options for its East
Irish Sea Transmissions Infrastructure in support of its Mooir Vannin project.

See Fig 2 below and at this link - <https://eastirishseatransmissionproject.co.uk/documents>

25 By way of an update, at a meeting on the 4th of August between Orsted and Fylde
Borough Councillors, Orsted advised that they had been directed to connect to
Penwortham by National Grid and essentially that if this wasn't accepted then they
feel that they would go to the back of the queue, so felt obliged to accept.

There is no awareness of any published consistent comparative assessment of
material alternatives in reaching that connection point assessment to ensure the
delivery of an efficient, coordinated and economic transmission system.

30 One option Orsted is considering proposes a route search area with a landfall
around Rossall Beach on the north Fylde coast and across open space to the
Hillhouse Technology Enterprise Zone (HTEZ).

If National Grid had reportedly not indicated otherwise, this route would then enable
a connection to the existing National Grid 400kV network known as the "Heysham

Ring” to Penwortham and beyond, via their Stanah connection point, scalably
35 upgraded to reflect new customer requirements.

This is the “Established Northern Route” that so many community members and their
representatives have highlighted to be adopted by the Morgan and Morecambe
projects to the benefit of all.

Indeed the use of this infrastructure was identified in 2008 in the National Grid’s
40 offshore Energy Strategic Environmental Assessment submission. See the EWG’s
submission REP1-083 for references and further examples. It has been in
established use by the Walney 2 wind farm to transmit its power to consumers since
2012. Thus demonstrating the efficacy of the “Established Northern Route” over the
hypothetical routes involving all new infrastructure as proposed by the Applicants.

45 National Grid’s response to the Examining Authority (REP3-088) highlights that
upgrades to Stanah are feasible and subject to understanding of customer
requirements in the area can be implemented. Access to the land on the 138 hectare
HTEZ site as offered in REP1-187 by the principal owner of HTEZ, NPL, makes this
flexible and scalable.

50 This would avoid yet further the adverse environmental, community, economic and
time impacts of the alternative that Orsted, Morgan and Morecambe projects are
now each faced with in under-grounding cabling some 30km+ inland to Penwortham
and seeking large scale locations to host infrastructure.

In the approach to Penwortham, Orsted have also reported in their meeting with
55 Fylde Borough Councillors, that the existing constraints combined with the proposed
constraints of the Morecambe and Morgan hypothetical routes mean that they can
only consider yet a further overhead crossing across the River Ribble. Thus, adding
to the intensity of the already complex visual character of the electricity infrastructure
in that “choke point”.

60 In addition, despite having access to all the Morgan and Morecambe published
information regarding constraints, Orsted propose to locate their substation and
energy balancing infrastructure within 5km of Penwortham. Morgan and Morecambe
claim that they could not find comparable sites, so elected to propose developing on
critical Green Belt at a 7km distance, alleging “Very Special Circumstances”. This
65 can only add further adverse cumulative effects across the life cycles of all three
projects in that area.

This means that there is the prospect of the adverse cumulative effects of three NSIP
projects under development across a similar time-frame, but specifically
undetermined periods, under-grounding three sets of 30km+ cable routes and large

70 scale substation sites potentially all on land other than that already designated for such a purpose.

Yet the Government's objectives for clean power 2030 could be delivered faster, cheaper with less risk and without these adverse cumulative effects. These could all be avoided by a coordinated approach to the project interrelationships utilising the
75 established infrastructure of HTEZ, Stanah and the 400kV Heysham Ring by the three projects, Morecambe, Morgan and Mooir Vannin transmission assets.

We note the offers of an invitation to visit HTEZ by the principal owner, NPL (REP1-187) and the further offers of support (REP1-072) and directions (REP3-077) by the Wyre Borough Council Ward Councillor.

80 We encourage the Examining Authority and the Secretary of State to see for themselves the Established Northern Route, sustainably operating today with scaleability already built in to the infrastructure on which it is hosted.

The Established Route offers benefits for all over the theoretical routes submitted by the Applicants and in particular in delivering the Government's objectives in an
85 efficient, coordinated and economic way.

Thank you for your consideration.

Peter Collins

Councillor and Minority Leader – Fylde Borough Council

Councillor – Newton with Clifton Parish Council

90 Chair - Lancashire Association of Local Councils Fylde Area Committee Energy Working Group

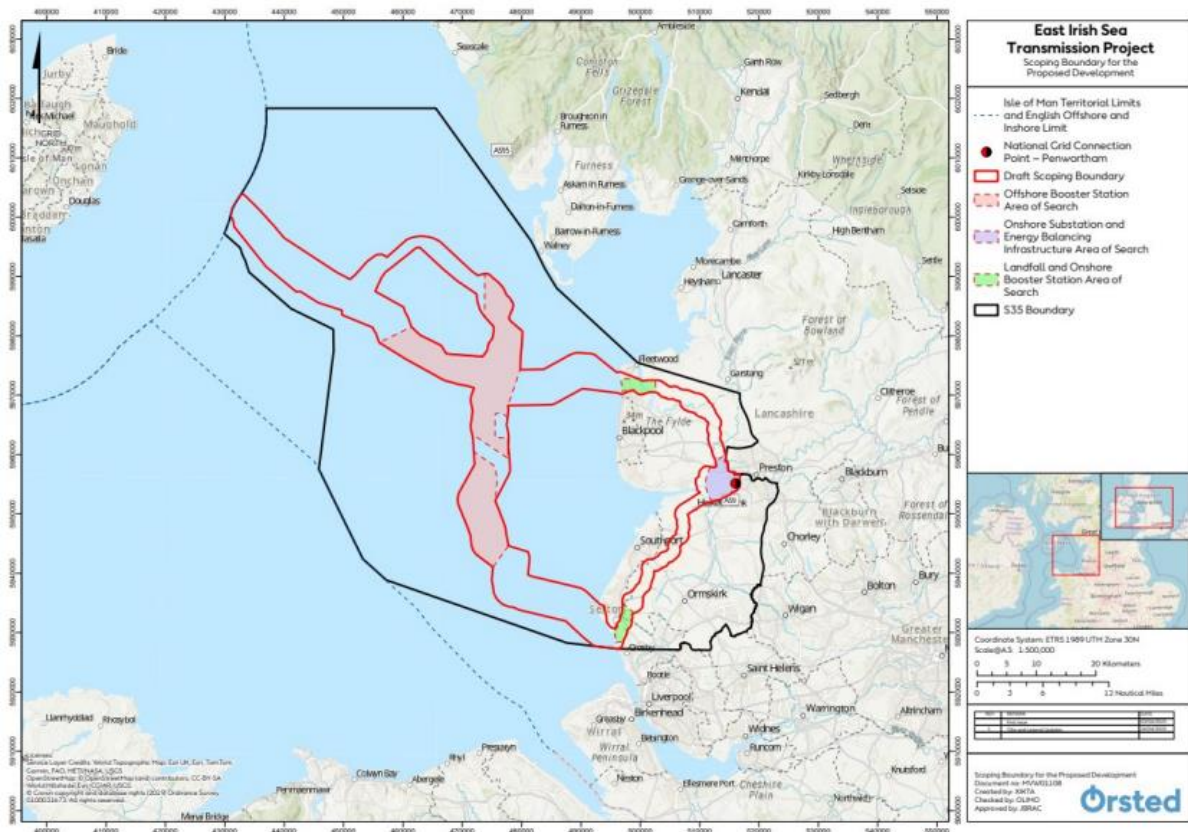


Figure 2: East Irish Sea Transmission Project Draft Scoping Boundary