

Your ref : EN020032

SoS DESNZ c/o John Wheadon

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LONDON

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10th April 2026

Dear Secretary of State

EN020032 - Response to 12 March 2026 Request for Information

Observations on the Process Issues Identified and Their Implications

1. Introduction

I would offer some further observations relevant to this current application relating to the Transmission Assets for the Morgan & Morecambe Wind Farms. The issues are related to process issues that can be identified from the material presented both prior to and during the recent Examination process. However, the comments offered here go further and examine the shortfalls that have been identified and the subsequent consequences, including some of the major issues that have been identified in the Secretary of States letter seeking further information.

The issues relate to:

- A possible system oversight failure of Ofgem's approach, including the impact of oversimplification in the HND process.
- The consequence that has arisen relating to the issues of Bird Strike, particularly in relation to the operations of BAE Systems at the Warton Aerodrome, its primary test centre.
- The consequent economic implications of possible decisions and the failure to support the required growth and regeneration required Nationally, but specifically in this corner of the Country.

2. Observations on a Possible Systemic Oversight Failure of Ofgem's Current Approach to Energy Connection

I write as a Chartered Engineering Fellow with 56 years' experience in aerospace systems development and integration, currently serving as Chair of the Registration Committee of the Royal Aeronautical Society and as a member of the Engineering Council Registration Standards Committee. I also serve as a Parish Councillor and Chair of Planning in Freckleton, Lancashire.

My professional background is in whole-system optimisation, risk management, and complex infrastructure integration. It is from that systems perspective that I raise a matter of serious concern regarding Ofgem's current oversight of electricity transmission connection arrangements in Lancashire.

a. The Core Concern: Misalignment with Statutory Duty

Under the Energy Act 2023 and the Electricity Act 1989, Ofgem's principal objective is to protect the interests of existing and future consumers — including through cost efficiency, security of supply, and support for Net Zero.

The evidence emerging from the Fylde Coast offshore wind connection arrangements suggests that:

Decision-making is being driven by minimisation of National Grid's designated network costs, rather than by

Optimisation of total end-to-end whole-system cost to consumers, and

Without transparent reassessment as project assumptions materially change.

This creates a material risk that avoidable infrastructure costs — currently estimated at £1.5 billion — may be locked into the system and borne ultimately by consumers through Offshore Transmission Operator (OFTO) charges, constraint payments, and reinforcement works.

b. Previous Attempts to Address the Issue

A fellow Councillor from Newton with Clifton Parish, [REDACTED], has previously attempted to engage Ofgem members regarding this issue. However, each time, he was directed back to the existing system approach, which seems to be the heart of the problem. Engagement with Ofgem, NESO, and DESNZ previously has met defensive responses, hindering opportunities for improved efficiency and coordination.

This may stem from a mismatch between Ofgem's oversight requirements and the approach taken by NESO and NGET which seems to minimize costs for National Grid PLC, rather than consumers.

More recent engagement with Ofgem, which is still ongoing, has so far resulted in the same form of response, which appears to deny responsibility by any party for minimising costs.

c. Out of Date and Unresponsive Processes?

The original HNDR process of 2022 appears to rely on a desk-based analysis, using now outdated or incomplete land and infrastructure data, failing to include available local knowledge relating to infrastructure and has not been revisited despite major project changes.

There is failure to recognise the significance of the local airfields situated on the Fylde, although Blackpool Airport was recognised as a problem to be addressed. The military activities at Warton Aerodrome, which hold National Defence interest significance, are totally absent in the assessment, as have the significant passenger activities that associate with the Company business.

Currently, multiple developers have each been directed toward use of 30km buried connections to the inland site at Penwortham. The potential for utilisation of the 138-hectare Hillhouse Technology Enterprise Zone, which already hosts the Walney 2 transmission structure, which is connected to Stanah appears not to have been properly assessed as a shared hub solution.

d. Identification of Avoidable Consumer Costs

Representatives from a group of Fylde Parishes, including myself, have identified an avoidable consumer cost of approximately £1.5 billion, due to the costs in creating these multiple new infrastructures, namely the Morgan & Morecambe and Moor Vannin projects, rather than prioritising reinforcement of the existing infrastructure as an alternative solution.

There is evident systemic focus on minimising National Grid costs for a designated network rather than assessment of end-to end whole-system project costs of feasible options, particularly around lack of "prioritising reinforcement" of the existing infrastructure. This is not in accord with NESO's advice to Government. Developers appear to feel pressured into adopting routes to those National Grid PLC connections to which they have been directed to by NESO.

This process did not account for the establishment costs for new generation and transmission assets, which are covered by system offshore wind project developers in assessing connection point options and minimising consumer costs at the project outset. Nor does it incorporate updates as new opportunities for infrastructure sharing emerge. Nevertheless, these costs are borne ultimately by the consumer upon grid connection through OFTO charges, along with any potential curtailment costs related to grid capability issues.

Developers of the Morgan and Morecambe projects proposed a shared cable route to Penwortham substation, which NESO supported for reducing impacts; however, this was amended in the joint Transmission Assets DCO Application when it became clear that there were two separate projects in both design and time and the impact was not reassessed.

Moor Vannin was also directed to Penwortham without transparent evaluation of benefits. With Morgan now withdrawing but maintaining its application—despite failing to meet Net Zero targets—there is a clear need for reassessment under changed conditions.

e. Omission of Growth & Regeneration Duties

You may already be aware that Lancashire's Blackpool North and Fleetwood constituency is advancing their Gateway for Clean Energy (GfCE) initiative, which recognises the strategic opportunity to the offshore wind generation activity with regeneration of a highly deprived area. The Wyre peninsula forms an excellent exemplar area for adopting a regulatory innovation sandbox framework.

With such a system perspective, there is also the opportunity to include green hydrogen generation and storage for the already granted DCO in the local area and the provision for the proposed GB-Isle of Man Inter-connector. These provide further energy balancing & impact management opportunities, which in turn reduce network capacity and consumer costs. This also offers the opportunity to address frustrations in current processes and so enable the required consumer cost minimisation, growth and delivery of net zero targets, whilst still ensuring safe and sustainable development for all.

Ofgem and NESO should be encouraged to be part of this concept and the benefits that are inherent with it.

3. Observations on Bird Strike Issues Raised During the Examination Process

a. General Notes

Bird Strike probability relates to the likelihood of collisions between birds and flying aircraft, which can cause significant hazard to the aircraft, the onboard personnel and persons on the ground, including risk of death. It is a particular concern for operation at or close to airfields.

It is clear, from the questions that are being raised at present by DESNZ, that the issues relating to the possible impacts of bird strike probability on the Airfields and the whole of Fylde and West Lancashire local area are far from resolved.

b. Impact of the HND Process and Recommendations

Reviewing the available documents, there appears to be a consistent omission from the outset which may be critical to the whole discussion.

The initialising document that selected the possible route was the Holistic Network Design Review¹, which provided an initial identification of a possible route from the Irish Sea for a connection to the chosen National Grid substation at Penwortham, near Preston.

This document did identify that there were issues to be overcome associated with Blackpool Airport, mainly associated with detail of the physical routing around this facility, but did not identify the risk zone associated with that operation or the significance of this. Equally, the omission of Warton Aerodrome, which maintains a military classified airspace zone, is a critical issue not reflected in the initial design selection nor the subsequent detail design activities.

¹ Pathway to 2030, Holistic Network Design – July 2022

RAF Woodvale Airfield, at Ainsdale near Southport, was recognised as military and eliminated for this reason in this same document.

This situation is reflected in the Environmental Impact Assessment Scoping Report².

An AI word search in this document for Blackpool Airport confirms the reference to the physical aspects of the design at Blackpool.

A similar search for Warton Aerodrome returns a negative result, although the maps included in reference 2 do indicate the existence of the facility, and Warton is mentioned as a Community Constraint in the HND, as a built area.

Of note, RAF Woodvale, adjacent to Southport, is identified and therefore excluded

c. NPS Requirements

It is noteworthy that the issue relating to Bird Strike and the implications in relation to design of developments in proximity to airfields has long been recognised and it is incorporated in the National Policy Statements, specifically in NPS EN1 Section 5.5. The implication is that this issue is not new and has been recognised for many years.

Specifically, Para 5.5.41 makes reference to the need to not impact on bird strike probability by observing a 13 km (8 mile) exclusion zone around notified airfields. The requirement applies to all designated civil airfields, of which Blackpool Airport is one, and military airfields or ranges, which would include Warton Aerodrome.

Throughout the Examination, there have been questions raised in the documentation by a range of interested parties to which unsatisfactory responses have been presented at the various deadlines, resulting in more comments.

The responses from the Applicants have only served to generate further comments and queries, from the Examiners and Interested Parties and especially BAE Systems and the Defence Infrastructure Organisation.

It is notable that in the latest version of the Environmental Statement³, there is detail of the relevant sections of the NPS provided in Table 11.1 - Summary of the NPS EN-1, NPS EN-3 and NPS EN-5 requirements relevant to this chapter, but this paragraph does not appear.

d. Current “Technical” Arguments

Most of the argument presented in reference 3 relates to re-assessment of the bird strike probability numbers resulting from the proposed changes. With the benefit of hindsight and the apparent omissions, this would appear to be a very risky approach.

Reliance is made on a sort of “Pseudo-Science” in an attempt to derive a method that would require considerable effort to confirm the assumptions are correct and remain correct, as opposed to adopting the more conservative but established safe approach as demanded by Para 5.5.41 which invokes the 13 km zone around airfields.

The latter requires no further policing or maintenance to ensure success. It also avoids all the lengths that have been gone to in attempting to prove the plan is actually viable, with all the risk that attaches so such an approach.

It does imply that the chosen route was never really viable and should not have been considered. Had the airfields, especially Warton Aerodrome, been recognised at the outset, then the BRAG rating that should have been applied, would have eliminated this chosen routing option from the outset.

² Morgan & Morecambe Offshore Wind Farms: Transmission Assets – Environmental Impact Assessment Scoping Report – October 2022

³ REP7-012 F3.11 Environmental Statement Volume 3 Chapter 11 – Aviation & Radar

4. Economic Impact Considerations Relating to Warton Aerodrome

BAE Systems is a Defence Company of International Significance, especially in these times of International stress, and forms a major support to the UK National Defence and Armed Forces. It is a major employer, particularly in this local area, with many dependent SMS businesses across the North West of England and throughout the wider UK regions.

There are close liaisons with Partner Companies and Defence Agencies, many of which are spread across Europe and NATO.

This requires close liaison and working together to deliver the programmes. To facilitate these exchanges, the Company operates its own airline, Corporate Air Transport, with a fleet of smaller airliners.

At the peak of activity on projects, such as Typhoon, this generated around 100,000 passengers per annum through Warton Aerodrome. This is not a trivial operation.

The economy of this region is highly dependent on the ability of BAE Systems to operate its test flying of military aircraft. These aircraft, which are armed for every flight – if only for the crew escape system – operate in a manner that is less predictable than the civil traffic that also operates from Warton Aerodrome. They may be frequently involved in high energy manoeuvring tasks as part of the testing which may be down to the lowest permitted levels whether over sea or land, as appropriate.

This is part of the normal routine of their testing and/or demonstration to UK MoD and the Armed Forces as well as potential world-wide Customers for the air vehicles.

5. Conclusions

The following conclusions are drawn

1. The current proposed development, as defined by the DCO, fails to comply with the declared objective of provision of energy at least cost.
2. The proposal does not support the objective of Growth and Regeneration – especially in this locality.
3. The omission of the Airfields in the initial assessments, especially Warton Aerodrome, has resulted in issues relating to Bird Strike and consequent increase in Risk of Death by neglect of the relevant section of the NPS (EN1 Para 5.5.41).
4. Consequently, the proposal increases the risk of adverse impact on critical National Infrastructure of both the BAE Systems Warton and Westinghouse/BNFL Springfields sites in their ongoing operations and future sustainability.
5. An Obvious Material Alternative Solution, as yet not fully assessed, using the Hillhouse TEZ with new substations thereon and with the existing transmission line capability, eliminates all of these unacceptable technical issues at a single stroke, as it relies upon existing infrastructure outside the critical zones.
6. This alternative offers a significant cost saving overall and the regeneration opportunity needed by Northwest Lancashire.

Perhaps, given the state of current knowledge, a full reconsideration of the bigger picture now presented would be more appropriate?

This is not about criticism. It is about correcting a systemic oversight risk before costs are locked in.

I respectfully recommend that DESNZ:

1. Conduct an up-to-date, comprehensive, and consistent assessment of the multiple proposed projects for the Fylde Coast, comparing a Hillhouse/Stanah2 connection—an existing Technical Enterprise

Zone—with a Penwortham connection. This assessment should explicitly assess the total lifetime consumer costs.

2. Defer or refuse the final DCO application until the outcomes of the assessment are completed.
3. Expand the Blackpool North & Fleetwood Gateway for Clean Energy (GfCE) partnership board with key stakeholders, such as Ofgem, DESNZ and NESO, to explore coordinated infrastructure and regulatory innovation.
4. Recognise the Wyre peninsula and related programmes as suitable for examination in a Regulatory Innovation Sandbox framework, noting that Lancashire County, Wyre Borough and Fylde Borough Councils have completed a preliminary Green Book assessment of the option suggested, with a favourable initial conclusion.
5. Appropriate processes can then be adapted and applied to minimize consumer costs, facilitate growth & regeneration in a severely deprived area, and of course, advance Net Zero targets, with safe & sustainable development.

6. Benefits of the Proposed Approach

Time is short. The financial exposure is material. The systemic risk is identifiable. The corrective opportunity is still available.

This proposal is made in good faith and in the interests of consumers, growth, and delivery of Net Zero.

Yours faithfully,

[Redacted signature block]

Cllr. [Redacted] BSc., C.Eng., FRAeS

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