

**Submission On Behalf Of The Lancashire Association Of Local Councils**

**Fylde Area Committee Energy Working Group**

**To:**

The [REDACTED] MP

5 Secretary of State for Energy Security and Net Zero  
Department for Energy Security and Net Zero (DESNZ)

**DESNZ Reference:** EN020032

**IP Reference:** [REDACTED]

**23 August 2026**

10 **PLANNING ACT 2008 AND THE INFRASTRUCTURE PLANNING (EXAMINATION  
PROCEDURE) RULES 2010**

**APPLICATION BY MORGAN OFFSHORE WIND LIMITED AND MORECAMBE  
OFFSHORE WINDFARM LIMITED**

15 **Application for an Order Granting Development Consent for the Proposed Morgan and  
Morecambe Offshore Wind Farms Transmission Assets**

**Response to the Secretary of State's request for information dated 17 August 2026 and  
material published up to 17 August 2026**

**1. Introduction**

- 20 1. This submission is made on behalf of the **Lancashire Association of Local Councils  
(LALC), Fylde Area Committee Energy Working Group (EWG)** in response to the  
Secretary of State's request for further information dated 17<sup>th</sup> August 2026 and the material  
subsequently published in connection with the Secretary of State's consideration of the  
Morgan and Morecambe Offshore Wind Farms Transmission Assets DCO application.
- 25 2. The EWG respectfully requests that this submission is recorded and attributed to the  
**Lancashire Association of Local Councils Fylde Area Committee Energy Working  
Group**, rather than to an individual contributor.
3. The EWG notes that its previous submission responding to the Secretary of State's request  
for information was published on 11th August 2026 but was attributed as a personal  
contribution. The EWG would be grateful if the record could be corrected accordingly.
- 30 4. The EWG has again carefully reviewed the Applicants' responses, including the material  
published in response to the issues raised by the Secretary of State and the EWG's earlier  
representations.
- 35 5. Having undertaken that review, the EWG remains of the view that the Applicants have **not  
demonstrated that the Hillhouse Technology Enterprise Zone (HTEZ)/Stanah  
alternative has been properly assessed and ruled out on evidence.**
6. The EWG therefore respectfully asks the Secretary of State to consider whether the  
decision-making process can properly be completed without first addressing that alternative,

particularly in light of changes to the project structure, the assumptions underpinning the 2022 Holistic Network Design Review (HNDR), subsequent network developments, and the evidence concerning environmental, public-safety and economic impacts.

7. For ease of reference, the EWG's earlier representations, supporting evidence and references are provided at **Enclosure 1**.

## 2. Executive Summary

8. The EWG's central submission is straightforward.

9. There is a materially different transmission strategy available in the **Hillhouse/Stanah corridor** which, on the evidence already submitted to the Examination, has the potential to:

- a. make greater use of existing electricity transmission infrastructure;
- b. make use of an established coastal energy location and the HTEZ;
- c. reduce the need for new transmission infrastructure across inland Lancashire;
- d. reduce the extent of new underground cable construction;
- e. reduce potential impacts on Green Belt and other environmentally sensitive land;
- f. avoid or materially reduce identified aviation and bird-strike concerns;
- g. reduce the number and extent of new infrastructure elements required inland;
- h. provide opportunities for coordinated development with other offshore wind projects;
- i. reduce infrastructure costs borne ultimately through regulated network charges and consumers; and
- j. support the Government's wider objective of accelerating investment, growth and net-zero infrastructure.

10. The EWG does not suggest that the existence of an alternative automatically requires the Secretary of State to reject the Application. Rather, the submission is that **the materiality of the Hillhouse/Stanah option is such that it should be properly evaluated before the Secretary of State concludes that the proposed Penwortham-based arrangement represents the appropriate solution.**

11. This is particularly important because the policy framework requires the mitigation hierarchy to be applied and because the 2025 version of EN-1 expressly requires consideration of environmental, social and economic benefits and adverse impacts at national, regional and local levels. ([GOV.UK](https://www.gov.uk))

12. The EWG therefore asks the Secretary of State to consider four principal questions:

- **First:** Has the Hillhouse/Stanah option actually been assessed as a transmission-system alternative, rather than merely dismissed by reference to the Applicants' existing connection arrangements?

- **Second:** Do the assumptions relied upon in the 2022 HNDR remain applicable to the Application as it now stands?
- **Third:** Have the Applicants demonstrated that their present proposal is the option which best applies the mitigation hierarchy, including avoidance of adverse impacts rather than merely mitigation after those impacts have been created?
- **Fourth:** Has the economic and system-wide cost of the respective options been independently and transparently compared, including the value of existing infrastructure and the implications for consumers?

### 3. The HNDR and the Changed Circumstances

13. A significant part of the Applicants' response appears to rely upon their involvement in the 2022 Holistic Network Design Review.

14. The EWG does not dispute the relevance of the HNDR. The issue is whether conclusions reached in that exercise remain determinative when the circumstances and configuration of the projects have materially changed.

15. The HNDR was undertaken as a strategic, system-level exercise intended to consider offshore wind connections in the context of the 2030 net-zero objective.

16. The EWG's concern is that important assumptions underpinning the HNDR are not necessarily reflected in the Application now before the Secretary of State.

17. In particular, the EWG understands that the HNDR assumptions included a coordinated approach involving the Morgan and Morecambe projects, including shared infrastructure arrangements.

18. The Application now presented to the Secretary of State contains a materially different configuration, including separate project structures, separate development requirements and multiple infrastructure elements.

19. The question therefore arises whether the conclusions of the HNDR can properly be relied upon without a further assessment of the present scheme.

20. A strategic network assessment cannot sensibly be treated as immutable where the projects, connection arrangements, timing, network circumstances and surrounding development assumptions have changed.

21. The EWG respectfully submits that the relevant question for the Secretary of State is not simply:

What did the HNDR conclude in 2022?

22. It is:

**Do the assumptions which produced those conclusions still apply to the development now being considered, and has the present proposal been tested against the available alternatives on the same system-wide basis?**

23. This distinction is material.

24. If the Application no longer delivers the coordinated configuration assumed by the HNDR, then reliance upon the HNDR as justification for the present configuration requires careful scrutiny.

25. The EWG accordingly asks the Secretary of State to require a clear explanation of:

a. the assumptions concerning Morgan and Morecambe upon which the relevant HNDR conclusions depended;

b. which of those assumptions remain applicable;

c. which have changed;

d. the consequences of those changes; and

e. whether the Hillhouse/Stanah option has been assessed against the present-day scheme rather than against an historic project configuration.

#### 4. The Hillhouse/Stanah Alternative Has Not Been Properly Tested

26. The EWG has consistently identified the Hillhouse Technology Enterprise Zone and adjacent Stanah infrastructure as a potentially material alternative.

27. The EWG's position is not based simply upon a preference for a particular locality.

28. The alternative is based upon the proposition that the transmission system should be assessed as a system, including existing infrastructure, existing connection points, established energy-sector land, existing corridors and opportunities for coordinated future development.

29. The HTEZ is already associated with energy-sector activity and has already hosts offshore wind transmission infrastructure associated with Walney 2.

30. The adjacent Stanah substation is connected to the wider transmission network.

31. The EWG has also drawn attention to evidence previously submitted to the Examination concerning the potential use and reinforcement of the existing network between Stanah, Heysham and Penwortham.

32. The question is therefore not whether a completely new transmission system could be constructed at Hillhouse/Stanah.

33. The relevant question is whether **existing infrastructure can be reinforced and utilised to an extent that provides a materially better overall solution than constructing substantial new infrastructure inland to Penwortham.**

34. That question remains material even if the Hillhouse/Stanah option would itself require reinforcement or additional works.

35. The Applicants' position appears to focus substantially upon the connection arrangement which exists for the Application.

145 36. That is not, however, the same question as determining whether the resulting network arrangement is the more efficient, coordinated and economical solution available.

37. A connection agreement is an important consideration. It should not, however, necessarily be treated as proof that no alternative system configuration is capable of providing a better overall outcome.

150 38. The EWG therefore respectfully requests that the Secretary of State distinguishes between:

(i) the existence of an existing connection arrangement; and

(ii) the wider question of whether that arrangement represents the optimum transmission solution when the whole system, consumers, environmental impacts and future coordinated development are considered.

## 155 5. Existing Infrastructure and the Principle of Coordination

39. Section 9(2)(a) of the Electricity Act 1989 places a statutory duty upon the holder of a transmission licence to develop and maintain an **efficient, co-ordinated and economical system of electricity transmission**. ([Legislation.gov.uk](https://legislation.gov.uk))

160 40. Ofgem continues to describe this as a statutory obligation on National Grid Electricity Transmission and has recently relied upon section 9(2) in regulatory enforcement activity. ([Ofgem](https://www.ofgem.gov.uk))

41. The EWG does not suggest that section 9(2) itself determines this DCO application.

165 42. Rather, the statutory duty provides important context for the Secretary of State's consideration of whether the proposed transmission arrangement has been sufficiently tested against available opportunities for coordination and efficient use of existing infrastructure.

43. Ofgem's wider network-planning work has also emphasised the importance of strategic planning capable of supporting net zero **at lowest cost to consumers**. ([Ofgem](https://www.ofgem.gov.uk))

44. The EWG therefore considers it appropriate for the Secretary of State to ask whether the present proposal:

170 a. maximises use of existing transmission infrastructure;

b. avoids unnecessary duplication;

c. minimises new infrastructure;

d. provides an efficient and coordinated connection solution; and

175 e. represents an economical outcome when assessed across the whole system rather than solely from the perspective of the individual project.

45. These questions become particularly important where the alternative route would utilise an established energy location and existing transmission infrastructure rather than requiring substantial new infrastructure across previously undeveloped land.

## 6. Cost and Consumer Impact

- 180 46. The EWG has previously submitted indicative evidence suggesting that a Hillhouse/Stanah-based strategy could produce substantial capital-cost savings.
47. The figure of approximately **£1.5 billion** has appeared in previous submissions as an indicative estimate based upon transmission cost information.
- 185 48. The EWG recognises that this figure should not be treated as an established fact unless independently verified.
49. The important point is therefore not that the Secretary of State should accept the £1.5 billion figure without further analysis.
- 190 50. It is that **a potentially very substantial cost differential has been identified and has not, in the EWG's submission, been satisfactorily resolved by the Applicants' evidence.**
51. The appropriate response is independent comparative assessment.
52. Such an assessment should compare, on a consistent basis:
- a. new cable construction;
  - b. cable length;
  - 195 c. substations;
  - d. grid connection works;
  - e. reinforcement of existing transmission infrastructure;
  - f. land acquisition and rights;
  - g. construction duration;
  - 200 h. environmental mitigation;
  - i. compensation;
  - j. operational and maintenance costs;
  - k. future expansion and coordination;
  - l. financing implications; and
  - 205 m. costs ultimately borne by consumers through regulated network charges.
53. Ofgem has consistently placed significant emphasis on network investment being justified and efficient for consumers. ([Ofgem](#))
- 210 54. The EWG therefore respectfully submits that the Secretary of State should not assume that the least-cost option for an individual connection agreement necessarily represents the least-cost solution for the electricity system or consumers as a whole.

## 7. The Mitigation Hierarchy

55. The EWG considers that the mitigation hierarchy is particularly relevant to the choice between transmission strategies.

56. The current EN-1 requires applicants to identify environmental, social and economic effects and to demonstrate how significant negative effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy. ([GOV.UK](https://www.gov.uk))

57. The 2025 EN-1 also makes clear that, for CNP infrastructure, the presumption in favour of nationally significant low-carbon infrastructure does not apply to residual impacts presenting an unacceptable risk to human health or public safety, among other specified matters. ([GOV.UK](https://www.gov.uk))

58. This distinction is important.

59. There is a fundamental difference between:

**a. avoiding an adverse impact through selection of a different route; and**

**b. creating the impact and then attempting to mitigate it.**

60. If the Hillhouse/Stanah alternative can avoid particular environmental or public-safety impacts associated with the proposed route, that possibility should be considered at the **avoidance** stage of the mitigation hierarchy.

61. The EWG therefore respectfully submits that mitigation cannot properly substitute for consideration of a materially different location or route which could avoid the relevant impact altogether.

## 8. Aviation and Bird-Strike Risk

62. The EWG remains concerned about the interaction between the proposed development, biodiversity measures and local aviation activity.

63. The issue is not simply an environmental matter.

64. Where habitat creation or biodiversity enhancement has the effect of attracting bird populations into an area of aviation activity, there is a potential interaction between biodiversity objectives and aviation safety.

65. The EWG understands that the Application and its mitigation proposals have identified measures intended to manage bird-strike risk.

66. If those measures include the lethal control of birds attracted by habitat-management measures, this raises an obvious question as to whether the underlying conflict could instead be avoided by selecting a different transmission route.

67. The EWG does not suggest that bird control measures are necessarily unlawful or unavailable.

68. The concern is more fundamental:

**If the Hillhouse/Stanah alternative would avoid or materially reduce the identified aviation/bird-strike conflict, why should that alternative not be considered at the avoidance stage before reliance is placed upon mitigation measures?**

- 250 69. This is especially important because the current EN-1 expressly identifies unacceptable risks to human health and public safety as matters which are not simply overridden by the CNP presumption. ([GOV.UK](https://www.gov.uk))
70. The EWG therefore requests that the Secretary of State considers:
- a. the aviation operations potentially affected;
  - b. the bird populations potentially attracted by the proposed biodiversity measures;
  - 255 c. the resulting bird-strike risk;
  - d. the effectiveness and permanence of proposed mitigation;
  - e. whether any mitigation involves lethal control;
  - f. the interaction between the mitigation and the stated biodiversity objectives; and
  - g. whether the Hillhouse/Stanah alternative avoids the conflict altogether.
- 260 71. If the alternative avoids the conflict, that is not merely a mitigation detail. It is potentially a **site-selection issue**.

## **9. Environmental and Land-Use Impacts**

72. The EWG also asks the Secretary of State to consider the cumulative land-use consequences of the proposed Penwortham-based strategy.
- 265 73. The current proposal involves substantial new transmission infrastructure inland, including underground cable routes and associated infrastructure.
74. The EWG's concern is that these impacts should be compared with the impacts of reinforcing and utilising existing infrastructure and established energy-sector land at Hillhouse/Stanah.
- 270 75. The comparison should include:
- a. Green Belt;
  - b. agricultural land;
  - c. biodiversity and protected habitats;
  - d. flood risk;
  - 275 e. landscape;
  - f. construction impacts;
  - g. cumulative impacts with other energy projects;
  - h. new substations and associated land take;

- 280 i. temporary construction compounds and access requirements; and  
j. the long-term flexibility of the resulting transmission system.
76. The EWG's case is that the alternative should not be judged merely by whether it introduces some environmental impacts of its own.
77. The appropriate comparison is **the overall balance of impacts between the alternatives.**

## 285 **10. Changes in the Wider Network Context**

78. The EWG has also previously drawn attention to the forthcoming cessation of generation at Heysham nuclear power station and the potential consequences for the regional transmission network.
- 290 79. The EWG recognises that the retirement of generation does not automatically translate into an equivalent quantity of transferable transmission capacity.
80. Nevertheless, it is a material change in the regional network context which merits examination.
81. The question is whether changes in generation, network configuration, reinforcement and future projects alter the relative merits of alternative connection strategies.
- 295 82. The EWG therefore respectfully requests that the Secretary of State obtains confirmation from NESO/NGET as to:
- a. the present and forecast capacity of the relevant network;
  - b. the implications of the closure of Heysham generation;
  - c. the extent to which capacity may become available or be reconfigured;

300 d. the implications for Morecambe;

  - e. the implications for Morgan;
  - f. the implications for Mooir Vannin and other potential projects; and
  - g. whether the Hillhouse/Stanah option has been reassessed against the current network position.
- 305 83. The fact that a network position has previously been assessed does not remove the need to consider subsequent material changes.

## **11. The Relationship with Mooir Vannin and Future Coordination**

84. The EWG also considers that the emergence of other offshore wind proposals provides an additional reason for considering the transmission system strategically.
- 310 85. A transmission solution which is suitable for one project in isolation may not necessarily represent the most efficient solution when several projects are considered together.

86. Conversely, infrastructure that already exists or can be reinforced may offer opportunities for future coordinated development.

315 87. The Secretary of State is therefore respectfully invited to consider whether the Hillhouse/Stanah corridor provides a more flexible platform for coordinated future offshore wind transmission than the creation of multiple independent inland transmission routes.

320 88. This is consistent with the Government's broader approach to strategic network planning and the need to ensure that network development supports net zero efficiently and at lowest reasonable cost to consumers. ([Ofgem](#))

## 12. The HTEZ as a Strategic Energy Location

89. The Hillhouse Technology Enterprise Zone is not simply an alternative piece of land.

90. It is an established strategic employment and energy location with existing infrastructure, utilities, access arrangements and a history of hosting energy infrastructure.

325 91. The EWG considers that these characteristics materially alter the planning balance.

92. Where nationally significant infrastructure can be accommodated within or alongside an established energy-sector location, the Secretary of State should consider whether this provides a more sustainable approach than creating new corridors and infrastructure across undeveloped land.

330 93. The EWG therefore asks that the HTEZ/Stanah option be assessed as a **strategic infrastructure location**, rather than simply as an alternative cable route.

## 13. Failure to Test the Alternative

335 94. The EWG's most significant concern remains that, despite the alternative having been identified repeatedly during the planning process, there has not been a sufficiently transparent and comprehensive comparison between:

**Option A – the Application's present Penwortham-based transmission strategy**  
and

**Option B – a coordinated Hillhouse/Stanah strategy utilising and reinforcing existing infrastructure.**

340 95. The EWG recognises that the Applicants have provided explanations as to why they consider the alternative unsuitable.

96. However, explanation is not necessarily the same as comparative assessment.

97. A proper comparative assessment should establish, using common assumptions:

a. capital cost;

345 b. operating cost;

c. programme;

- 350 d. deliverability;  
e. grid capacity;  
f. reinforcement requirements;  
g. environmental effects;  
355 h. biodiversity;  
i. aviation safety;  
j. land requirements;  
k. construction effects;  
l. future flexibility; and  
m. consumer impact.
98. Without such a comparison, the Secretary of State is left with the Applicants' assessment of their own proposal rather than an independent assessment of whether the proposal is preferable to the alternative.
- 360 99. That is particularly important where the alternative is alleged to offer substantial reductions in cost and environmental impact.

#### 14. The Importance of the Current EN-1 Policy Framework

100. The EWG recognises the Government's Critical National Priority policy for offshore wind and supporting transmission infrastructure.
- 365 101. The EWG fully supports the need for rapid development of renewable generation and the infrastructure necessary to connect it.
102. The issue is therefore not whether the Morgan and Morecambe projects should contribute to net zero.
103. The issue is **how that infrastructure should be delivered**.
- 370 104. EN-1 establishes the urgent need for nationally significant low-carbon infrastructure, but also requires consideration of adverse effects and application of the mitigation hierarchy. ([GOV.UK](https://www.gov.uk))
105. The EWG's position is therefore entirely consistent with the CNP policy.
106. The faster route to net zero is not necessarily the route proposed by an individual  
375 Applicant.
107. If an alternative can deliver substantially the same strategic objective with lower environmental impact, lower public-safety risk, lower cost and greater use of existing infrastructure, it is reasonable for the Secretary of State to require that alternative to be properly examined before concluding that the proposed scheme should proceed.

380 **15. The Application Should Not Be Determined on an Outdated Comparison**

108. The EWG respectfully submits that the Secretary of State should avoid determining the Application on the basis of a comparison which reflects the network and project circumstances of 2022 rather than those prevailing in 2026.

109. The relevant circumstances now include:

- 385 a. changes to the structure of the Morgan and Morecambe projects;
- b. changes to their respective delivery arrangements;
- c. the emergence of other offshore wind proposals;
- d. developments concerning Mooir Vannin;
- e. changes to the wider transmission network;
- 390 f. the forthcoming cessation of Heysham nuclear generation;
- g. continuing development of the HTEZ;
- h. further evidence regarding aviation and bird-strike risk; and
- i. the Government's continuing emphasis upon accelerating infrastructure delivery while reducing costs and supporting economic growth.

395 110. These matters reinforce, rather than diminish, the case for a current comparative assessment.

**16. Opportunity for a Site Visit**

111. The EWG understands that the owner/operator of the Hillhouse site, NPL, has previously offered to facilitate a site visit.

400 112. The EWG understands that this offer remains available.

113. The EWG respectfully suggests that a site visit could materially assist the Secretary of State and officials in understanding:

- a. the physical relationship between Hillhouse and Stanah;
- b. existing energy infrastructure;
- 405 c. existing access and utilities;
- d. the existing transmission corridor;
- e. the relationship with the wider Lancashire network;
- f. the potential for future energy development; and
- g. the contrast between an established energy-sector location and the creation of new inland transmission infrastructure.
- 410

114. The EWG therefore respectfully encourages the Secretary of State and/or officials to undertake such a visit before determining the Application.

## 17. Conclusions

115. The EWG supports the rapid delivery of offshore wind and the achievement of the UK's net-zero objectives.

116. It does not seek to frustrate or delay the development of the Morgan and Morecambe projects.

117. Its concern is that the national importance of these projects makes it **more**, not less, important that the transmission infrastructure is delivered in the most efficient, coordinated, economical and environmentally responsible manner available.

118. The EWG's case can be summarised as follows:

**First**, the Hillhouse/Stanah option is a materially different transmission strategy and should be treated as such.

**Second**, the Applicants have not demonstrated to the EWG's satisfaction that this option has been assessed against the current Application and current network circumstances.

**Third**, the assumptions underpinning the 2022 HNDR require reconsideration where the project structure and delivery arrangements have changed.

**Fourth**, the existence of a connection arrangement at Penwortham should not of itself determine whether Penwortham represents the more optimum system-wide solution.

**Fifth**, the mitigation hierarchy makes avoidance through alternative siting or routing an important consideration where a different route may avoid adverse effects.

**Sixth**, the potential interaction between biodiversity measures and aviation/bird-strike risk raises a public-safety issue which should be assessed at the route-selection stage.

**Seventh**, the potential cost differential is sufficiently material that an independently verified comparative transmission-cost assessment is warranted.

**Eighth**, the existing HTEZ/Stanah infrastructure and energy-sector land provide a materially different starting point from the construction of multiple new inland transmission corridors.

**Ninth**, subsequent changes to the regional network and the wider offshore wind programme reinforce the need for current strategic assessment.

119. The EWG therefore respectfully asks the Secretary of State to conclude that the evidence presently available does **not** establish that the Application's proposed transmission strategy is preferable to the Hillhouse/Stanah alternative.

120. The EWG respectfully requests that, before determining the DCO, the Secretary of State:

- 450           a. requires a transparent comparative assessment of the Penwortham and Hillhouse/Stanah strategies;
- b. obtains confirmation from NESO/NGET of the current and forecast network position and the technical feasibility of the Hillhouse/Stanah option;
- c. obtains an independent assessment of the comparative capital and whole-life costs of the two strategies;
- 455           d. requires the Applicants to explain precisely which HNDR assumptions remain applicable to the Application as presently configured;
- e. requires the aviation and bird-strike implications of the competing transmission strategies to be compared;
- 460           f. considers whether the Hillhouse/Stanah strategy would avoid rather than merely mitigate particular environmental and public-safety impacts;
- g. considers the potential for coordinated development with other offshore wind projects;
- h. considers the strategic value of the HTEZ and existing transmission infrastructure; and
- 465           i. considers whether the Application should be modified, deferred for further assessment, or refused if the necessary evidence cannot demonstrate that the proposed arrangement represents the appropriate solution.

## 18. Final Submission

- 470       121.       The EWG respectfully submits that there is no conflict between supporting net zero and requiring the most efficient transmission solution.
122.       On the contrary, the national importance of the Morgan and Morecambe projects makes it essential that avoidable cost, environmental damage, unnecessary infrastructure and public-safety risks are not locked into the electricity system for decades.
- 475       123.       The EWG therefore respectfully asks the Secretary of State to ensure that the **Hillhouse/Stanah alternative is properly and transparently assessed before the Application is determined.**
124.       If that assessment demonstrates that the alternative is faster, more economical, more coordinated and less harmful, the EWG respectfully submits that the Application should be modified accordingly.
- 480       125.       If the Applicants cannot demonstrate that their proposed Penwortham strategy is preferable when the two options are assessed on a like-for-like, system-wide basis, the Secretary of State should not assume that the existence of the present connection arrangement resolves the matter.
- 485       126.       The EWG's position is therefore one of **support for the objective, but insistence upon the better available means of achieving it.**

127. The EWG respectfully invites the Secretary of State to take the opportunity presented by the present decision to secure a transmission solution which supports net zero while also promoting the Government's objectives of economic growth, efficient infrastructure investment, environmental protection, public safety and affordability for consumers.

490 **For and on behalf of**

**Lancashire Association of Local Councils**

**Fylde Area Committee Energy Working Group**

**Date: 23 August 2026**



495 Chair

Lancashire Association of Local Councils

Fylde Area Committee Energy Working Group

**Enclosure A**

**Thread of EWG representations from the Examination closure and subsequent Secretary of State correspondence, including supporting evidence and references.**

505                    **Submission on Behalf of the Lancashire Association of Local Councils**  
                         **Fylde Area Committee Energy Working Group**

**To:**

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510    **Head of Energy Infrastructure Planning Delivery & Innovation**  
      **Department for Energy Security and Net Zero (DESNZ)**

**DESNZ Reference: EN020032**

**IP Reference: ██████████**

**7 August 2026**

Dear ██████████,

515    **PLANNING ACT 2008 AND THE INFRASTRUCTURE PLANNING (EXAMINATION**  
      **PROCEDURE) RULES 2010**

**Application by Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited**  
**(“the Applicants”) for an Order Granting Development Consent for the Proposed Morgan**  
**and Morecambe Offshore Wind Farms Transmission Assets (“the Proposed Development”)**

520    Response to the Head of Energy Infrastructure Planning Delivery & Innovation Request for  
      Information dated 8 July 2026

1. This submission is made on behalf of the Lancashire Association of Local Councils (LALC)  
Fylde Area Committee Energy Working Group (EWG) in response to your request for  
information dated 8 July 2026.
- 525    2. We have carefully reviewed the responses published on 29 June 2026 that were provided by  
      the Applicant to the submission made by the EWG in the matters raised by the Secretary of  
      State.
3. We can confirm, that in our assessment, none of their the Applicants responses provide the  
evidence that overturns the validity and factuality of the EWG’s representations they  
530    responded to or subsequently.
4. For ease of reference we attach our thread of representations from the examination closure  
with supporting evidence and references at Enclosure A.

**Conclusion**

535    The EWG respectfully reiterates its invitation for the Secretary of State and relevant officials to  
      consider the HTEZ/Stanah option in greater detail and, if appropriate, undertake a site visit.

It is noted that the largest component of the DESNZ organisation outside London is based at Salford  
in the north west of England. Those based there will know that this is an easily commutable  
distance to visit the coastal HTEZ/Stanah site with its existing infrastructure and the all new South  
Fylde & Penwortham routing proposals of the applicants.

540 There the Secretary of State or their representatives will be able to confirm at first hand the efficacy of the EWG's representations:

i.e. the imbalance of harms over benefits of the applicants' current approach and the outstanding net benefits of the route via the longstanding, nationally designated & provisioned HTEZ/Stanah site for the energy sector and the efficient reinforcement of the existing infrastructure. This offers faster engineering delivery of Net Zero, at a lower cost to consumers and co-ordination with Mooir Vannin EISTP proposals. In addition the HTEZ/Stanah routing offers the opportunity of faster planning delivery & innovation through the function that you lead, most notably by the application of the Regulatory Innovation Sandbox frameworks promoted across HM Government that you will be familiar with and so ensure that the applicants' investors, nor consumers are disadvantaged by the fear of incurring avoidable delays or additional net costs.

Our principal concern remains that neither the Applicants nor NESO have provided evidence demonstrating that the proposed development represents the most efficient, coordinated and economical transmission solution when compared with the reinforcement and utilisation of existing infrastructure. In particular, no comparative assessment has been presented between the proposed approach—which involves extensive new underground cable routes—and a solution based on the enhancement of existing transmission assets.

The Applicants, in their submission seeking Section 35 Direction ([see link at para 4.18](#)) use the example of the AQUIND Interconnector proposal as a project similar in character to theirs. The Secretary of State refused to grant a Development Consent Order to this project application on grounds including failure to assess the Obvious Material Alternative. The Applicants will therefore be familiar with the requirement to adequately consider the Obvious Material Alternatives, such as the HTEZ/Stanah route. As noted previously, Orsted, the Mooir Vannin EISTP developers, have indicated that they recognise the benefits of the HTEZ/Stanah route over a new Penwortham connection in their Environmental Impact Scoping Report and the Secretary of State will be aware of the engagements that continue with the regulator and other bodies in this matter.

In the absence of such an assessment, the HTEZ/Stanah proposal remains, in our view, an Obvious Material Alternative that has not been adequately evaluated.

Accordingly, we respectfully submit that:

- a) further assessment of the HTEZ/Stanah alternative should be undertaken before any determination is made; and
- b) if such assessment is not undertaken, the Secretary of State should carefully consider whether the Applicants' proposal demonstrates that its benefits outweigh its adverse impacts and whether the requirements of an efficient, coordinated and economical transmission system have been satisfied. If not then a refusal is required, and the Obvious Material Alternative remains.

575 Yours sincerely,



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

**Enclosure 1.**

580                                **Submission on Behalf of the Lancashire Association of Local Councils**  
                                         **Fylde Area Committee Energy Working Group**

To:  
The [REDACTED] MP  
Secretary of State  
585    **Department for Energy Security and Net Zero (DESNZ)**

**DESNZ Reference: EN020032**

**IP Reference: [REDACTED]**

**22 June 2026**

Dear Secretary of State,

590    **PLANNING ACT 2008 AND THE INFRASTRUCTURE PLANNING (EXAMINATION  
PROCEDURE) RULES 2010**

**Application by Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited  
("the Applicants") for an Order Granting Development Consent for the Proposed Morgan  
and Morecambe Offshore Wind Farms Transmission Assets ("the Proposed Development")**

595    Response to the Secretary of State's Request for Information dated 20 May 2026

5. This submission is made on behalf of the Lancashire Association of Local Councils (LALC) Fylde Area Committee Energy Working Group (EWG) in response to the Secretary of State's request for information dated 20 May 2026.
6. Throughout the Planning Inspectorate examination, the EWG has sought to ensure that the  
600    proposed development is assessed against the statutory requirements for an efficient, coordinated and economical system of electricity transmission, while also supporting the Government's objectives of achieving Net Zero, promoting economic growth, and minimising costs to consumers.
7. The questions raised in the Secretary of State's request appear to reflect a number of  
605    significant matters that have remained unresolved throughout the examination process. It remains our view that many of these issues could have been avoided had there been a comprehensive and continuing assessment of all reasonable material alternatives by the relevant parties, including the National Energy System Operator (NESO) and the developers, particularly as new information became available regarding network capacity and connection opportunities. The implications arising from the absence of a clearly  
610    identifiable developer for certain Morgan-related elements of the joint application, simply seem to be adding to the complications.
8. In particular, the EWG continues to contend that significant impacts relating to maritime  
615    interests, land use and aviation safeguarding could have been substantially reduced or avoided through the use of existing energy infrastructure associated with the Hillhouse Technology Enterprise Zone (HTEZ) and Stanah area, together with reinforcement of existing 400kV overhead transmission infrastructure.

9. NESO's Clean Power 2030 advice to Government recognises that underground transmission infrastructure is generally more expensive than overhead transmission infrastructure. Given this principle, it would be reasonable to expect that reinforcement and optimisation of existing overhead transmission assets would be assessed as a priority option before proposing extensive new underground cable routes.
10. The rationale for such an assessment becomes stronger where multiple generation projects may be capable of sharing existing or reinforced transmission infrastructure, potentially reducing overall costs, environmental impacts and network complexity.
11. To date, the EWG has not identified evidence demonstrating that a comparative assessment of this nature was undertaken during the Holistic Network Design Review (HNDR) process, for the Morgan, Morecambe, Mooir Vannin EISTP at the time, nor subsequently when information regarding the availability and expansion potential of the adjacent Hillhouse site were highlighted from already publicly available information.
12. Nor have we identified evidence of a comprehensive comparative assessment between the Applicants' proposed approach and a solution based upon the prioritised use and reinforcement of existing infrastructure. The absence of such an assessment raises questions as to whether the statutory objective of securing an efficient, coordinated and economical electricity transmission system has been fully satisfied.
13. We note that, in relation to the Heckington Fen Solar Park decision, the Secretary of State recused himself from the determination process. We respectfully suggest that consideration be given to whether a similar approach may be appropriate in the present circumstances.
14. The EWG continues to believe that substantial opportunities exist to achieve lower consumer costs, support economic growth and reduce environmental impacts through consideration of the HTEZ/Stanah alternative, whilst removing the unacceptable harms of the present approach. Proper evaluation of this option would also provide greater confidence that all reasonable alternatives have been examined before a final decision is made.
15. As referenced in previous submissions, the owner of the HTEZ site has extended an invitation for decision-makers and relevant stakeholders to visit the site. We understand that this invitation remains open. Such a visit would provide an opportunity to examine directly the site's existing infrastructure, connectivity, available capacity and potential role within a coordinated transmission solution.
16. For ease of reference, we attach our previous submission, which set out in detail the case for the HTEZ/Stanah alternative. In our view, the issues identified within that submission remain unresolved. As a consequence, project timescales continue to be affected by ongoing uncertainty regarding the most appropriate and economical transmission solution.

## **Conclusion**

The EWG respectfully reiterates its invitation for the Secretary of State and relevant officials to consider the HTEZ/Stanah option in greater detail and, if appropriate, undertake a site visit.

660 Our principal concern remains that neither the Applicants nor NESO have provided evidence  
demonstrating that the proposed development represents the most efficient, coordinated and  
economical transmission solution when compared with the reinforcement and utilisation of existing  
infrastructure. In particular, no comparative assessment has been presented between the proposed  
approach—which involves extensive new underground cable routes—and a solution based on the  
enhancement of existing transmission assets.

665 In the absence of such an assessment, the HTEZ/Stanah proposal remains, in our view, an obvious  
material alternative that has not been adequately evaluated.

Accordingly, we respectfully submit that:

- a) further assessment of the HTEZ/Stanah alternative should be undertaken before any  
determination is made; and
- b) if such assessment is not undertaken, the Secretary of State should carefully consider whether the  
670 Applicants' proposal demonstrates that its benefits outweigh its adverse impacts and whether the  
requirements of an efficient, coordinated and economical transmission system have been satisfied.  
If not then a refusal is required, and the obvious material alternative remains.

Yours sincerely,

675   
Chair  
Lancashire Association of Local Councils  
Fylde Area Committee Energy Working Group

**Attachment 1  
Submission on Behalf of**

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

**To:**

The [REDACTED]

Secretary of State

Department for Energy Security & Net Zero (DESNZ)

**DESNZ Reference:** EN020032

**IP Reference:** [REDACTED]

**Date:** 13 April 2026

**Dear Rt. Hon. Secretary of State,**

**PLANNING ACT 2008 AND THE INFRASTRUCTURE PLANNING (EXAMINATION  
PROCEDURE) RULES 2010**

**APPLICATION BY MORGAN OFFSHORE WIND LIMITED AND MORECAMBE  
OFFSHORE WINDFARM LIMITED (“THE APPLICANTS”) FOR AN ORDER  
GRANTING DEVELOPMENT CONSENT FOR THE PROPOSED MORGAN AND  
MORECAMBE OFFSHORE WIND FARMS TRANSMISSION ASSETS (“THE PROPOSED  
DEVELOPMENT”)**

**RESPONSE TO 12 MARCH 2026 REQUEST FOR INFORMATION**

1. This submission responds to your 12 March 2026 request for information on behalf of the Lancashire Association of Local Councils Fylde Area Committee Energy Working Group (EWG).
2. The EWG has engaged extensively in the Planning Inspectorate examination to ensure that this development aligns with the legislative framework and Government objectives of minimizing consumer costs, achieving Net Zero targets, and promoting economic growth.
3. The Applicants’ letter of 30 January 2026 raises points regarding transmission asset location and routing via the Hillhouse Technology Enterprise Zone (HTEZ) and adjacent National Grid PLC Stanah Substation. From the concept outset and throughout the planning life cycle to date, it has remained entirely possible and appropriate to develop and examine alternative - lower unacceptable harm and higher benefit balance - proposals of the obvious material alternative that includes a route to Penwortham via HTEZ/Stanah, and this remains the case. HTEZ already hosts transmission infrastructure for the Walney 2 offshore wind farm and the adjacent National Grid PLC Stanah substation, which connects with Heysham and Penwortham substations and the wider network. Our submission Rep7-047 (attached) addresses these points in detail, and the Applicants have not provided evidence to refute it.
4. The HNDR is clear that its conclusions relied upon the Applicants’ joint proposal for a shared cable corridor, a shared single substation and a single export cable, reducing the number of connections and environmental impacts. This has not been delivered in the Applicants’ submissions, nor reassessed. The Mooir Vannin project proposal, though

720 contemporaneous to the HNDR, was not included in the HNDR and has not been assessed  
with the Morgan and Morecambe proposals in a coordinated way to ensure that costs are  
725 minimised for the consumer and that the proposals are efficient. The proposals do not adopt  
NESO's advice to Government for Clean Power 2030 to prioritise the reinforcement of  
existing infrastructure. The construction of three completely independent cable routes, some  
30km inland without a consistent comparative assessment of reinforcing the coastal  
connection infrastructure is in conflict with that advice. The HNDR appears to have ignored  
730 the criteria to avoid military airfield activity and so the bird-strike issue and its risk of severe  
consequences of death and impact on critical national infrastructure in the vicinity continue.  
Similarly the proposals conflict with land and marine environmental protection zones. The  
HNDR also does not seem to have recognised the obvious value of utilising the provision of  
sites to support energy sector development in local development and growth plans, such at

735 5. Since the October 2025 closing statements, the Proposed Development's character has  
changed: the Morgan element now appears "zombie" in status, while the Morecambe  
element remains adopting a complex land route for a reduced assured total proposed  
development output. National Grid's prior assessment overlooked HTEZ/Stanah as a viable  
site for both Morgan and Morecambe infrastructure & network connectivity, which it now  
recognizes as eligible (see Rep7-047 Annex 3). Concurrent discussions with NESO and  
National Grid PLC regarding Orsted Mooir Vannin's interest in the benefits of connecting  
via HTEZ/Stanah, illustrate opportunities to reinforce HTEZ/Stanah, delivering cost,  
growth, and environmental benefits that the Applicants' current approach fails to realize.

740 6. The Applicants have not countered the EWG's evidence demonstrating that the Morgan and  
Morecambe energy can be delivered in a manner that:

a. Complies fully with planning policies, mitigating harms to air, land, and marine environments,  
including bird-strike risks of death and to critical national infrastructure (e.g. BAE Systems Warton  
and Westinghouse Springfields), whereas HTEZ/Stanah is outside identified bird-strike risk zones.

745 b. Aligns with NESO's Clean Power 2030 guidance to prioritize reinforcement of existing  
infrastructure, which is achievable at HTEZ/Stanah.

750 c. Minimizes consumer costs. The Applicants' proposal would incur nearly £1.5bn of avoidable  
expenditure and costs to consumers across the three windfarm projects due to proposed  
independent, ~30 km inland cable routes to Penwortham. National Grid PLC (rep1-089) also  
submitted that Penwortham requires substantial substation upgrades and potential greenbelt  
compulsory land acquisition. In contrast, coordinating via HTEZ/Stanah would realize significant  
consumer cost and emissions savings.

755 7. Your public statements on energy costs and the Clean Energy Economy emphasize growth,  
Net Zero delivery, and minimising consumer costs. The Applicants' current plan fails on all  
three, whereas HTEZ/Stanah achieves these objectives.

8. As of 11<sup>th</sup> April, NESO Transmission Entry Capacity registers indicate Morecambe and  
Morgan are scheduled for June and November 2029 completion and connection to the grid  
network, respectively. Reinforcing existing infrastructure at HTEZ/Stanah is clearly

760 achievable within this engineering timeframe, with risk and schedule benefits from negating  
the creation of 90km of undergrounded cable routes.

9. To avoid disadvantaging developers by process constraints, the HTEZ/Stanah could serve as  
a regulatory sandbox innovation zone, complementing initiatives like Ofgem's Anticipatory  
Investment Policy (AIP) and National Grid Electricity Transmission Partnership (ETP),  
765 facilitating coordinated, cost-effective, and timely development in alignment with  
government objectives as well as the business cases of developers and investors.

10. Supporting evidence, including the EWG Closing Statement to the Examining  
Authority (Rep7-047) attached, remains unchallenged. Site visits were invited but not  
undertaken by the Examining Authority.

**Conclusion:**

770 We invite you to visit HTEZ/Stanah to witness a development solution that aligns with Net Zero  
targets, fosters local economic growth, and minimizes consumer costs. We urge assessment and  
implementation of this approach prior to determination. If this is not adopted, the Applicants'  
proposal presents an imbalance of harms over benefits and should be refused, with the  
HTEZ/Stanah option as the unassessed Obvious Material Alternative.

775 Yours sincerely,

  
Chair

Lancashire Association of Local Councils  
Fylde Area Committee Energy Working Group

## **Appendix 1**

### **Copy of Examining Authority Submission Rep7 -047**

**Submission on Behalf of the LALC FAC ENERGY WORKING GROUP**

**REPRESENTATION ON THE PROPOSED MORGAN AND MORECAMBE OFFSHORE  
WIND FARMS TRANSMISSION ASSETS DEVELOPMENT CONSENT ORDER**

**PLANNING INSPECTORATE REFERENCE NUMBER: EN020028**

**Closing Statement –**

***The Imbalance of Harms over Benefits  
and  
Failure to Assess the Obvious Material Alternative***

This submission is the closing statement of Lancashire Association of Local Councils, Fylde Area Committee Energy Working Group (EWG). It focuses on the imbalance of harms over benefits and the failure to assess the Obvious Material Alternative route, such that the Development Consent Order Application should be refused or the Applicants should be directed to assess the generators to consumers route via Stanah/Hillhouse Technology Enterprise Zone (HTEZ) and the 400kV Heysham Ring.

The Applicants could have avoided their current difficulties with fulfilling the requirements of the Electricity Act 1989 (sections 3A & 9), which mandates the development and maintenance of an efficient, coordinated, and economic system for electricity transmission and distribution (as specified in the Electricity Networks National Policy Statement – EN-5 section 2.2.10). They had—and still have—the option to propose connecting consumers via the Obvious Material Alternative route through Stanah, HTEZ, and the National Grid using the 400kV Heysham Ring by upgrading existing infrastructure.

Adopting this route would be faster, more efficient, and approximately £1.5 billion less expensive than the combined proposals from the Morgan, Morecambe, and EISTP Mooir Vannin projects. The supporting cost data is detailed Annex 1. This nationally significant saving represents the net benefit of a coordinated approach across these projects. It is noted that despite having been given the opportunity to refute the order of these savings, neither the Applicants nor NGET have offered alternatives.

This proposal directly aligns with NESO's recommendations to the Government in "Clean Power 2030: Advice on Achieving Clean Power for Great Britain by 2030," particularly section 5.2:

<https://www.neso.energy/document/346651/download>

"The proposed plans in this report minimise new onshore infrastructure. We are prioritising reinforcement of existing infrastructure and have identified some marine cabling by 2030. This was a core part of the network plans that form the basis for proposals in this report: those plans consider ways to maximise and upgrade the existing network first, and only once this reaches a limit are new lines considered."

Annex 2 of this closing statement includes section 5.2 in full and expands on the benefits and reduced harms that come from prioritising reinforcement of existing infrastructure—demonstrating the fundamental logic for NESO's commitment to this strategy.

835 Therefore, it is logical, nay obvious, to prioritise the use and improvement of current infrastructure.  
The Applicants have chosen not to pursue this Obvious Material Alternative path, though they still could.

840 On October 27th, Fylde's MP [REDACTED] released correspondence from National Grid. In a letter dated September 26th, 2025 (see Annex 3), National Grid's Director of Customer and Network Development confirmed that Stanah/Hillhouse "could provide a potential location for a new substation," although it has yet to be evaluated.

845 "Linked to this, whilst the adjacent Hillhouse land could provide a potential location for a new substation, our regulatory framework requires such a choice to be evidenced. As such, NGET would have to carry out an extensive selection study, to determine the most appropriate site, according to the principles of cost and efficiency."

850 Our submission REP1-083 details the references evidencing Stanah's repeated shortlisting for Irish Sea shoreline projects. These include the National Grid input to the Offshore Energy Strategic Environmental Assessment, (SEA) Celtic Array, Moorside, Walney Extension, and Walney 2 proposals. As far back as 2008, National Grid in their input to the Offshore Energy SEA (Table 40) recognised that what is now the HTEZ site could host onshore transmission infrastructure associated with the Stanah connection point. Since 2012, the offshore transmission infrastructure for Walney2 has used the HTEZ site and connected to the National Grid via the Stanah point. HTEZ  
855 also provides a direct 2km access corridor to the Irish Sea shore, allowing efficient and coordinated connections between generators and consumers. The site's benefits and feasibility are obvious.

860 ExA members could have verified this themselves by accepting NPL's invitation (the HTEZ site owner, see REP1-187).

It is welcomed, however, that the ExA has publicised their investment of time to personally see the compliant, open space access to HTEZ from Rossall Beach and the established infrastructure from Stanah via the Heysham Ring lines. From that investment, it therefore appears that the ExA agrees that this is an Obvious Material Alternative worthy of assessment. It removes all the harms of the  
865 Applicants' proposals and offers extra benefits such as quicker construction and lower costs. This is achieved by strengthening existing infrastructure and avoiding many tens of kilometres of disruptive all new underground cabling, avoidable destructive Greenbelt development and unnecessary compulsory acquisition of land. With this alternative route, there are no "Very Special Circumstances" or unique reasons to require compulsory Acquisition procedures and so in conflict  
870 with the Local and National Planning and regulatory frameworks.

Moreover, NGET's submissions to the ExA (REP1-089) indicate that the Penwortham site currently lacks capacity and physical space for three new connections alongside other projects, necessitating compulsory purchase of South Ribble Greenbelt land. With Hillhouse now acknowledged by  
875 National Grid PLC as a possible substation location, NGET could face challenges and delays if pursuing compulsory acquisition near Penwortham without considering Stanah/HTEZ.

Although Applicants claim Stanah/HTEZ was assessed, the NESO Holistic Network Design Review (HNDR - <https://www.neso.energy/document/262681/download>) does not mention Stanah  
880 or Stanah/HTEZ, nor display assessment data (verifiable by searching "Stanah" in the report). This omission persists despite Walney 2's infrastructure being hosted at HTEZ and connected to consumers via the National Grid network and Stanah connection point. This is known to NGET and

the energy sector, published on network maps e.g. Open Infrastructure Map link :  
<https://openinframap.org/#8.14/53.763/-2.927>

885

The HNDR report states new substation locations were considered but it did not identify any in the North West or note their advantages—even where environmental issues were flagged. These include unnecessary conflict with the Ribble & Alt marine SPA, Greenbelt destruction, Compulsory Purchase of land, Excess Emissions from cable installation, and neglecting passenger/military operations at Warton and Blackpool with the associated Bird-Strike Risk to Life. According to HNDR's BRAG ratings, if there was a solution which addressed these harms, air operations should be rated RED. Since no rating exists for Warton, the St Annes/Penwortham route should logically have been rated BLACK, undermining its fundamental suitability. It is apparent that from the statements in the HNDR excerpt below, that even now, with emergent knowledge, the inadequacy of the initial assessments undertaken have not been reconsidered.

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From the HNDR Report, page 152 (<https://www.neso.energy/document/262681/download>) – author's underlining:

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"Potential interface point sites were initially ranked in terms of potential capacity (including planned capacity) to accept new generation inputs using information provided by the Transmission Owners (TOs).

905

This exercise included all existing and planned substations on the 400kV and 275kV network in the region and the study area was based on TO network information and the economic advantages of connecting close to the coast where possible. This did not preclude potential interfaces at new substation sites. It was noted at the outset that no new planned or potential substation locations were identified, and that these could be added if constraints to existing substations, or merits of potential new locations, warranted the consideration of new interface points.

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915

The principal constraints in the North West Region were the environment constraints on the offshore transmission cable routes and landfalls, and no distinct advantages of new substation locations were identified. The interface points considered therefore remained focused only on existing substation sites in the region.

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These locations, and all other potential interface points, were considered at a 'high level' (i.e. principal considerations) in a workshop in terms of deliverability (Objective 2) and environment and community constraints (Objectives 3 and 4). Environmental and community constraints were presented to focus on the highest level (Red in the BRAG dataset) at this stage, although information on characteristics behind these constraints, and other constraints, were also available.

925

The interface sites selected for further consideration for both the radial and coordinated designs in the North West Region were Middleton, Penwortham, Bodelwyddan and Pentir."

930

The HNDR required delivery by 2030 (HNDR Executive Summary Section 1.1 - "Commitments from the TOs to accelerate delivery of their reinforcement projects once detail of the changes set out in the BESS are confirmed, with the aim of delivering all necessary infrastructure by 2030").

and assumed shared cable corridors, substations, and export cables from applicants (HNDR Section 5.1.16 "Following stakeholder feedback, the design for R4\_5 and R4\_6 was changed from a

coordinated design with electrical integration offshore, to radial connections with a shared cable corridor. The connections would share a land substation site, landfall, and cable corridors. The developers had proposed this solution as an alternative to our proposed coordinated design”) —

935 but neither of these approaches is being followed. The Applicants have insisted on retained project delivery schedules that result in completions in 2036/37 and construction of two independent cable corridors and two independent substations and export cabling. No reassessment has been published, further undermining the sustainability of the duty of efficiency, coordination and economy.

940 Mooir Vannin was excluded from HNDR’s scope. This exclusion occurred even as Orsted has indicated their concurrent engagement with NGESO/NGET. This is reported in their East Irish Sea Transmission Project Environmental Impact Assessment (EIA) Scoping Report August 2025 in section 4.3.1.2 (link - <https://eastirishseatransmissionproject.co.uk/documents>) . Coordination opportunities to enhance efficiency, economy and reduce cumulative harm and emissions from further inland trenching rather than reinforcing existing or sharing new infrastructure have been missed. No reassessment of HNDR has since occurred, even though its assumptions and intended scope to ensure efficiency, coordination, and economy are now outdated.

945 NESO states, “The current connections queue currently holds over 750GW of projects — four times what we need for 2030 and twice what we need for 2050. (See:<https://www.neso.energy/news/reforming-connections-unlock-great-britains-economic-growth-and-clean-power-potential>).

950 The Applicants’ proposed maximum contributions represent just 0.064% to 0.19% of this queue, so these cannot reasonably be considered critically significant programs nationally. Their impact on achieving Net-Zero is marginal, and given the insisted four-year gap between projects, they do not credibly help reach 2030 targets. The benefits claimed for these projects in the national context do not outweigh the harms that arise from the approach that the Applicants have chosen to adopt.

955 Given the clear imbalance of unresolved, unacceptable harms versus minimal benefits—and the failure to assess the obvious alternative of reinforcing existing infrastructure via Stanah/HTEZ and Heysham Ring—these applications should be refused or withdrawn. This would allow adoption of the compliant, obviously viable alternative route to achieve a faster, smarter, and £1.5bn cheaper transition to Net-Zero, supporting government targets and consumer interests.

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## Annex 1

### Assessment of Comparative Costs of Utilising Established and Creating All New Infrastructure Between Fylde Coast & Penwortham NGET Substation

#### Total for Morgan, Morecambe and Mooir Vannin OWE projects

*Electricity Act 1989 - Section 9 :General Duties of Licence Holders:  
“to develop and maintain an efficient, co-ordinated and economical system of electricity transmission”*

Uses costings provided in [IET A Comparison of Electricity Transmission Technologies: Costs and Characteristics](https://www.theiet.org/media/axwkktkb/100110238_001-rev-j-electricity-transmission-costs-and-characteristics_final-full.pdf) 2025  
link - [https://www.theiet.org/media/axwkktkb/100110238\\_001-rev-j-electricity-transmission-costs-and-characteristics\\_final-full.pdf](https://www.theiet.org/media/axwkktkb/100110238_001-rev-j-electricity-transmission-costs-and-characteristics_final-full.pdf)

| Connecting Fylde Coast to Penwortham |                                                                                         | Total           | Net Savings |
|--------------------------------------|-----------------------------------------------------------------------------------------|-----------------|-------------|
| <b>1</b>                             | <b>Costs of All New Cable Under-grounding between Fylde Coast and Penwortham (30km)</b> | <b>£1,698 m</b> |             |
| <b>2</b>                             | <b>Costs of Northern HTEZ/Stanah Cable Route utilising established infrastructure</b>   |                 |             |
| a                                    | Costs connecting Fylde Coast (RB) with Stanah via HTEZ                                  | £181m           |             |
| bi                                   | Re-conductoring established 400kV OHL between Stanah & Penwortham                       | £28m            |             |
| 2i                                   | Total Established Infrastructure, including reconductoring, connecting RB to Penwortham | £209m           | £1,489 m    |
| bii                                  | Additional New 400kV OHL between Stanah & Penwortham                                    | £59m            |             |
| 2ii                                  | Total Established Infrastructure + New 400kV OHL, connecting Fylde Coast to Penwortham  | £240m           | £1,458 m    |

Note :

- 1. **Northern Route** – For All three OWE projects (Mooir Vannin, Morgan & Morecambe) utilising established Infrastructure between
  - Rossall Beach (RB) - Hillhouse Technology Enterprise Zone (HTEZ) – Stanah – Penwortham
    - a) Underground between RB – HTEZ boundary (2km),
    - b) Underground into HTEZ (0.6km)
    - c) OHL Across Hillhouse before Converter Substation (0.85km)
    - d) OHL Across Hillhouse after Converter Substation (0.85km)
    - e) Developer & NGET Substation Infrastructure Hosted on HTEZ
    - f) Reconductoring Established 400kV Overhead Line Stanah to Penwortham (23.5km); or
    - g) Additional 400kV Overhead Line Stanah to Penwortham (23.5km)

Annex 1 continued :-

**Assessment of Comparative Costs of Utilising Established and Creating All New Infrastructure Between Fylde Coast & Penwortham NGET Substation**

985 Uses costings provided in [IET A Comparison of Electricity Transmission Technologies: Costs and Characteristics 2025](#)

|    |                                                                                                                            |         |       |       |       |               |                        |
|----|----------------------------------------------------------------------------------------------------------------------------|---------|-------|-------|-------|---------------|------------------------|
| 1  |                                                                                                                            |         |       |       |       | Costs : Total | Net Savings            |
| 2  | <b>Costs of All New Cable Under-grounding between Fylde Coast and Penwortham (30km)</b>                                    |         |       |       |       |               |                        |
| 3  | Mooir Vannin                                                                                                               | 1.32 GW | £653m |       |       |               |                        |
| 4  | Morgan                                                                                                                     | 1,5 GW  |       | £653m |       |               |                        |
| 5  | Morecambe                                                                                                                  | 0.48 GW |       |       | £392m |               |                        |
| 6  |                                                                                                                            |         |       |       |       | <b>£1698m</b> |                        |
| 7  | <b>Costs of Northern HTEZ/Stanah Cable Route Costs utilising established infrastructure between Fylde Coast and Stanah</b> |         |       |       |       |               |                        |
| 8  |                                                                                                                            |         |       |       |       | sub-total     |                        |
| 9  | Mooir Vannin                                                                                                               | 1.32 GW | £69m  |       |       |               |                        |
| 10 | Morgan                                                                                                                     | 1,5 GW  |       | £69m  |       |               |                        |
| 11 | Morecambe                                                                                                                  | 0.48 GW |       |       | £43m  |               |                        |
| 12 |                                                                                                                            |         |       |       |       | £181m         |                        |
| 13 |                                                                                                                            |         |       |       |       |               |                        |
| 14 | <b>Costs of Upgrade of established 400kV link between Stanah &amp; Penwortham (23.5km)</b>                                 |         |       |       |       |               |                        |
| 15 |                                                                                                                            |         |       |       |       | sub-total     | <b>Net Savings</b>     |
| 16 | Re-conductoring established 400kV Overhead Line                                                                            |         |       |       |       | £28m          | <b>£209m</b><br>£1489m |
| 17 | Additional New 400kV Overhead Line                                                                                         |         |       |       |       | £59m          | <b>£240m</b><br>£1458m |

Note :

- **1. Northern Route** – For All three OWE projects (Mooir Vannin, Morgan & Morecambe) utilising established Infrastructure between
  - Rossall Beach (RB) - Hillhouse Technology Enterprise Zone (HTEZ) – Stanah – Penwortham
    - a) Underground between RB – HTEZ boundary (2km),
    - b) Underground into HTEZ (0.6km)
    - c) OHL Across Hillhouse before Converter Substation (0.85km)
    - d) OHL Across Hillhouse after Converter Substation (0.85km)
    - e) Developer & NGET Substation Infrastructure Hosted on HTEZ
    - f) Reconductoring Established 400kV Overhead Line Stanah to Penwortham (23.5km); or
    - g) Additional 400kV Overhead Line Stanah to Penwortham (23.5km)
- **Further Examples of Options of Resilience Measures**
  - Reconductor established 400kV Overhead Line Stanah to Heysham
  - Create separate connections to Heysham and Penwortham
  - Upgrade DNO 132kV links between Stanah & Penwortham
  - Add green Hydrogen generation, storage and distribution
  - Add further BESS & Gas Peaking Plants at HTEZ
  - Flow Control Devices
  - Substation equipment – Upgrades at Stanah replaces Upgrades at Penwortham
  - Other Options?

Annex 1 continued :-

The Following tables are also presented in REP2-0264

**Table 1 : Comparative Assessment of Costs Between Northern Route via Hillhouse Stanah and the Morgan & Morgan Applicants' (M&M) Proposals**

IET 2025 Report Link – Costings below use data from this report -

A Comparison of Electricity Transmission Technologies: Costs and Characteristics An independent report by Mott MacDonald in conjunction with the IETLink -  
[https://www.theiet.org/media/axwkkkb/100110238\\_001-rev-j-electricity-transmission-costs-and-characteristics\\_final-full.pdf](https://www.theiet.org/media/axwkkkb/100110238_001-rev-j-electricity-transmission-costs-and-characteristics_final-full.pdf)

| 1  | Route                                                                                  | Trenches/<br>Pylon Lines | km   | Transmission<br>Mode | IET 2025    |         | Cost<br>£m / km | Total Cost<br>£m | Cum Cost £m      | Ref      | Morecambe<br>£m | Morgan<br>£m |
|----|----------------------------------------------------------------------------------------|--------------------------|------|----------------------|-------------|---------|-----------------|------------------|------------------|----------|-----------------|--------------|
|    |                                                                                        |                          |      |                      | Cost £m     | Km      |                 |                  |                  |          |                 |              |
| 2  | Northern Route – Penwortham-Stanah-Hillhouse- Irish Sea                                |                          |      |                      |             |         |                 |                  |                  |          |                 |              |
| 3  | Irish Sea- RB-Hillhouse Boundary - Morecambe                                           | 1                        | 2    | Low                  | Underground | £44.32  | 3               | £14.77           | £29.55           | C        | £29.55          |              |
| 4  | Irish Sea- RB-Hillhouse Boundary – Morgan                                              | 1                        | 2    | Med                  | Underground | £73.84  | 3               | £24.61           | £49.23           | D        |                 | £49.23       |
| 5  | into Hillhouse – Morecambe                                                             | 1                        | 0.6  | Low                  | Underground | £44.32  | 3               | £14.77           | £8.86            | C        | £8.86           |              |
| 6  | into Hillhouse – Morgan                                                                | 1                        | 0.6  | Med                  | Underground | £73.84  | 3               | £24.61           | £14.77           | D        |                 | £14.77       |
| 7  | Across Hillhouse before Converter – Morecambe                                          | 1                        | 0.85 | Low                  | Overhead    | £7.73   | 3               | £2.58            | £2.19            | A        | £2.19           |              |
| 8  | Across Hillhouse before Converter – Morgan                                             | 1                        | 0.85 | Med                  | Overhead    | £9.17   | 3               | £3.06            | £2.60            | B        |                 | £2.60        |
| 9  | Across Hillhouse after Converter – Morecambe                                           | 1                        | 0.85 | Low                  | Overhead    | £7.73   | 3               | £2.58            | £2.19            | A        | £2.19           |              |
| 10 | Across Hillhouse after Converter – Morgan                                              | 1                        | 0.85 | Med                  | Overhead    | £9.17   | 3               | £3.06            | £2.60            | B        |                 | £2.60        |
| 11 |                                                                                        |                          |      |                      |             |         |                 |                  | £111.98          |          |                 |              |
| 12 | Stanah to Penwortham                                                                   | 1                        | 23.5 |                      | Reconductor | £89.90  | 75              | £1.20            | £28.17           | G        |                 | £28.17       |
| 13 |                                                                                        |                          |      |                      |             |         |                 |                  | £140.15          |          |                 |              |
| 14 |                                                                                        |                          |      |                      |             |         |                 |                  |                  |          |                 |              |
| 15 | Hambleton – Heysham                                                                    | 1                        | 25.9 |                      | Reconductor | £89.90  | 75              | £1.20            | £31.05           | G        |                 |              |
| 16 |                                                                                        |                          |      |                      |             |         |                 |                  | £171.20          |          |                 |              |
| 17 |                                                                                        |                          |      |                      |             |         |                 |                  |                  |          |                 |              |
| 18 | M&M Proposal                                                                           |                          |      |                      |             |         |                 |                  |                  |          |                 |              |
| 19 |                                                                                        |                          |      |                      |             |         |                 |                  |                  |          |                 |              |
| 20 | St Annes to Penwortham – Morecambe                                                     | 1                        | 30   |                      | underground | £195.80 | 15              | £13.05           | £391.60          | E        | £391.60         |              |
| 21 | St Annes to Penwortham – Morgan                                                        | 1                        | 30   |                      | underground | £326.51 | 15              | £21.77           | £653.02          | F        |                 | £653.02      |
| 22 |                                                                                        |                          |      |                      |             |         |                 |                  | £1,044.62        |          |                 |              |
| 24 |                                                                                        |                          |      |                      |             |         |                 |                  | £m 2 trench sets |          |                 |              |
| 25 | Irish Sea-RB-HTEZ-Penwortham – NO Reconductoring                                       |                          |      |                      |             |         |                 |                  | £932.64          |          | £348.81         |              |
| 26 | Saving Irish Sea-RB-HTEZ-Penwortham incl Reconductoring Stanah-Penwortham              |                          |      |                      |             |         |                 |                  | £904.47          |          |                 | £555.66      |
| 27 | Irish Sea-RB-HTEZ-Penwortham incl Reconductoring Stanah-Penwortham & Hambleton-Heysham |                          |      |                      |             |         |                 |                  | £873.42          |          |                 |              |
|    |                                                                                        |                          |      |                      |             |         |                 |                  |                  | checksum |                 | £904.47      |

**Table 2 : References for Data Extracted from IET Document and used as analogues in the Morgan & Morecambe routing cost comparison assessment above.**

| Ref            | IET Page |                                                                     | Ref | Total<br>Build<br>Cost |    |        | Analogue            |
|----------------|----------|---------------------------------------------------------------------|-----|------------------------|----|--------|---------------------|
|                |          |                                                                     |     | £m                     | km | £m/km  |                     |
| Overhead       |          |                                                                     |     |                        |    |        |                     |
| A              | Page 40  | Overhead Line – 3 km – Low Rating (2,494 MW)                        | A   | £7.73                  | 3  | £2.58  | Across HTEZ         |
| B              | Page 41  | Overhead Line – 3 km – Medium Rating (4,988 MW)                     | B   | £9.17                  | 3  | £3.06  | Across HTEZ         |
| Underground    |          |                                                                     |     |                        |    |        |                     |
| C              | Page 51  | Underground Cable Buried – 3 km – Low Rating (2,494 MW)             | C   | £44.32                 | 3  | £14.77 | Irish Sea-RB-HTEZ   |
| D              | Page 52  | Underground Cable Buried – 3 km – Medium Rating (4,988 MW)          | D   | £73.84                 | 3  | £24.61 | Irish Sea-RB-HTEZ   |
| E              | Page 54  | Underground Cable Buried – 15 km – Low Rating (2,494 MW)            | E   | £195.80                | 15 | £13.05 | St Annes-Penwortham |
| F              | Page 55  | Underground Cable Buried – 15 km – Medium Rating (4,988 MW)         | F   | £326.51                | 15 | £21.77 | St Annes-Penwortham |
| Reconductoring |          |                                                                     |     |                        |    |        |                     |
| G              | Page 106 | Reconductoring Using HTLS – 75 km – Additional Capacity of 2,494 MW | G   | £89.90                 | 75 | £1.20  | Stanah-Penwortham   |

## Annex 2

### Clean Power 2030

990 <https://www.neso.energy/document/346651/download>

## 5.2 Wider environmental and local community impacts

### Impacts of building clean power infrastructure

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Power projects have significant impacts on the wider environment and local communities, making it crucial to consider these factors in their development. Conducting thorough environmental impact assessments, engaging with stakeholders and affected local communities and implementing mitigation measures can help minimise negative impacts and enhance projects' sustainability. The planning and consenting process for new generating sites and infrastructure development covers local environmental factors such as noise, vibration, visual impact, flood risk, heritage, ecology and waste management.

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In a clean power system, more power needs to be transported over greater distances from generation sites to areas of demand. This requires various technologies, such as overhead lines, underground lines and subsea cables. Each technology has distinct technical characteristics and environmental impacts:

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- Overhead lines are usually the cheapest to build but have a visual impact through pylons and wires.
- Undergrounding is more expensive and involves environmental disturbance and potential damage during installation.
- Subsea cables are also costly and require connections to the onshore network, while posing challenges in the marine environment.
- Furthermore, long-term energy infrastructure may occupy valuable sites that could be used for other purposes.

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However, it is possible to minimise and mitigate these impacts. Having a clear plan for clean power allows for considering the environment holistically across the programme, making choices that collectively minimise potential negative impacts to the environment and communities and can support solutions that are positive for nature overall.

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**The proposed plans in this report minimise new onshore infrastructure. We are prioritising reinforcement of existing infrastructure and have identified some marine cabling by 2030. This was a core part of the network plans that form the basis for proposals in this report: *those plans consider ways to maximise and upgrade the existing network first and only once this reaches a limit are new lines considered*.** Strengthened engagement between developers, local authorities and communities is vital for building trust, addressing community concerns and incorporating them into network plans to minimise overall impact on local people.

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### Annex 3

1030 On the 27th of October Fylde's MP [REDACTED] released correspondence from National Grid's Director of Customer and Network Development in their letter dated 26<sup>th</sup> September 2025

Name & signature of sender is redacted.

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[REDACTED]  
Member of Parliament for Fylde  
House of Commons,  
London  
SW1A 0AA

26/09/2025

Dear [REDACTED]

**RE: Connection point for Morgan, Morecambe and Mooir Vanin offshore wind farm projects**

Thank you for including us in your recent letter to Ofgem regarding the use of Stanah substation as a connection point for offshore wind farm projects in the Irish Sea. I am responding to you on [REDACTED] behalf, in my capacity as the Director of Customer and Network Development within National Grid Electricity Transmission (NGET).

To open, I wanted to stress that, at National Grid, we are very mindful that the cost of maintaining and upgrading the transmission network is recouped through household energy bills and, as such, do our utmost to ensure that our work provides value for consumers across England and Wales. This principle is also central to the way in which we are regulated, with the Electricity Act of 1989 requiring us to develop proposals that are efficient, co-ordinated and economical.

To that end, when planning our work, National Grid assesses each of our projects on their own merits to ensure that we are enacting solutions that strike an appropriate balance between the three aforementioned factors. Each project must also be aligned to the strategic network planning stipulations set out by the National Energy System Operator (NESO), who own the contract with the connecting party, and approved by Ofgem to ensure that it offers value for consumers.

In looking at the specific instance at hand, Penwortham substation was chosen as the point of connection for the Morgan, Morecambe and Mooir Vanin offshore wind projects as a result of the strategic planning process, which was published as part of the NESO's Holistic Network Design (HND) in 2022. As such, I would suggest that NESO should be included in any further discussions on this topic.

I can, however, provide some insight into why Stanah substation was considered and not deemed an appropriate point of connection.

The first key factor is rooted in the site itself. In essence, Stanah is a small site that was built specifically to supply the lower voltage distribution network in the local area. As such, in its current form, it would not be able to accommodate an offshore wind connection.

In addition, as a result of the homes surrounding the site, it would not be possible to re-configure the existing substation to the appropriate degree to provide any further points of connection to the transmission network. This, therefore, would necessitate the construction of an entirely new substation, which would incur significant cost and potentially delay the aforementioned projects by a number of years.

Linked to this, whilst the adjacent Hillhouse land could provide a potential location for a new substation, our regulatory framework requires such a choice to be evidenced. As such, NGET would have to carry out an extensive selection study, to determine the most appropriate site, according to the principles of cost and efficiency.

Finally, as a result of the way in which the regional network is configured, in addition to building a new substation in the area, we would also have to construct a new overhead line to link the new site back to Penwortham. As such, the cumulative impact for building this new infrastructure, would therefore be significantly greater than the current proposed course of action.



I hope the above is helpful both in underlining National Grid's commitment to providing value for consumers and outlining the thinking that has driven the existing solution. If you have any further questions please do not hesitate to contact my team – I would be more than happy to meet with you, alongside appropriate representatives from Ofgem and NESO, for a detailed discussion.

Yours sincerely,

Director of Customer and Network Development,  
National Grid Electricity Transmission