

Ofgem  
9 Millbank  
London  
SW1P 3GE

Mr Graham Pitts  
Duddon Parish councillor  
Park Stile  
Church Street  
Broughton in Furness  
Cumbria  
LA20 6HJ

24 February 2017

Dear Sir / Madam,

Duddon Parish Council (DPC) is one of the councils on the South route of the proposed National Grid connection from Moorside to Lancashire. It has supported campaigns to find an acceptable solution for its parishioners. It supports the Parish Councils Co-ordinating Group (PCCG) in its aims:

- Campaign against the National Grid Plan to build large scale pylons within the current proposed route corridor
- Create a stronger voice within the consultation process
- Communicate and motivate constituents to engage with the National Grid plans and express their views

DPC wishes to respond to the consultation, North West Coast Connections Project (NWCCP) - **Consultation on the projects Initial Needs Case and suitability for tendering being undertaken by Ofgem**. We wish to specifically comment on the southern connection of the 400kV system.

DPC recently completed a lengthy response to the NWCCP public consultation phase. In it we stated that we represent the interests of the whole community and understand the needs of different groups within (such as young and elderly people, local business and tourism).

Comments within this response are from elected Councillors, which benefit from:

1. Understanding of the local community, built from long term experience delivering services to meet local needs, aiming to correctly appreciate, then **improving** quality of life and community wellbeing.
2. It is in our interests to speak on behalf of our community to identify **real improvements**, so that we can best allow those communities to maintain their sense of purpose and belonging, protect very sensitive local business (small farming or tourism reliant companies for example), and maintain the community strength and character that makes this area special to the UK.

We, therefore, believe we can be considered an authoritative Interested Party in the Ofgem consultation.

We note that the Ofgem consultation is divided into three themes, namely:

1. Whether Ofgem think there is a technical need for the project.
2. How National Grid (NGET) has narrowed down the option it has taken forward to its planning consultation.
3. Whether the project, or sections of it, are suitable for competitive tender.

We also note with interest Ofgem's statement:

***'Overall, we consider that a sensible and logical process has been followed to narrow down NGET's proposed design. However, we consider that the decision between NGET's favoured use of a tunnel under Morecambe Bay and an alternative approach of using subsea cables around the bay is relatively finely balanced. We have concerns that significant changes in the cost of the tunnel, or additional work identified through the planning process could indicate in the future that the subsea cable option could be better value for consumers. For this reason, if costs of the preferred option escalate significantly due to factors that NGET should have reasonably foreseen at this stage, we reserve the right as part of our Final Needs Case assessment to revisit the justification for its selected option.'***

We, of course, welcome the view of Ofgem in noting the current preferred route as set out in the published by National Grid, the Preliminary Information Environmental Report prefers the use of a mix of Undergrounding, Pylon Construction and the Morecambe Bay Tunnel compared to Subsea Cables which Ofgem notes to be "**finely balanced**".

For DPC, which is one of the parishes greatly impacted by the current intention to build Pylons in the Duddon Estuary, it is imperative that the following issues are considered by Ofgem as the Sub Sea route will deliver enhanced benefits beyond the technical and system issues which are set out in the consultation.

### **Technical Need for the Project.**

From the Government's estimates it seems that both much more power will be needed in the future - electric cars for instance - and the existing set of power generation is limited and ageing. Whilst we understand that alternative sources - interconnectors to other countries, windfarms, household solar power, small nuclear reactor development, supply intervention, tidal power - can all make an impact, we believe that there

will need to be a building programme for new power generation stations. The Government has chosen sites on the coast a long way from the centres of population they will serve. Therefore the supply will need to be connected to the demand, we accept that.

However we do not accept that this connection can be at the expense of trashing the hope, aspirations and opportunities of the local communities, their many visitors and the businesses supporting them. We do not believe that the current practices and techniques National Grid is employing are a credit to them or to the strategic thinking and subsequent direction from the nation. They should be required to look at other options and techniques used elsewhere in the world. In addition a research programme, funded by National Grid from their extensive profits, need to be in place to look at:

1. Offshore connection, HVAC and HVDC – after all all the sites are coastal and centres of population are accessible by sea in many cases. They should also be looking at this for interconnectors.
2. Techniques that can be rapidly adopted to reduce the effect of pylons everywhere. “Cut and cover” springs to mind. If the amount of new power needed is correct, the nation will be festooned with pylons unless we find other ways to do it.
3. Research into the use of new materials for cable construction. Many developments are taking place in materials with increased conductivity. The country is a world centre for this work. One outcome could be a reduction in cable size which will enable many new routes to be utilised. See 2 above.

Specifically where we are with NWCCP at the moment,

<b>Issue</b>	<b>Comments</b>
<b>Socio-economic</b>	<ul style="list-style-type: none"> <li>• The deployment of a Sub Sea route will enable our Visitor economy to continue to grow within the Furness and Duddon Estuary.</li> <li>• The preferred route of Pylons will have a long term impact on the quality of our resident’s lives, which has been a significant concern, as set out in many of the Parish Council submissions to NG.</li> </ul>
<b>Environmental Impact</b>	<ul style="list-style-type: none"> <li>• The use of the Sub Sea proposal will mitigate the significant environmental impacts and will protect and retain the land for both rural and recreational benefits.</li> <li>• The significantly reduced impact on our transportation system will deliver via the Sub Sea route, a much more environmentally sensitive approach, combined with enhanced safety for road users.</li> </ul>
<b>Risk Mitigation</b>	<ul style="list-style-type: none"> <li>• The proposed construction of the Morecambe Bay Tunnel and its associated engineering risks and uncertainties can be mitigated by the Sub Sea Route.</li> </ul>

However we have some reservations on the current world shortage of suitable cable manufacturing capacity for marine and underground use. We feel that one of the local towns – Barrow in Furness, Millom or Ulverston - will be more than happy to discuss the site of a cable manufacturing plant. They always welcome local participation in capital projects leading to onward business. This would be real investment in the local economy bringing lasting benefits.

### **Narrowing Down the Options in NWCCP**

DPC is firmly of the opinion that NWCCP has been consistently narrowing down the option towards an on land, pylon solution. Firstly, despite putting forward the option and using the same techniques and technology for interconnectors, NWCCP dismissed the offshore HVDC solution when it clearly offers environmental and security advantages. Several possible onshore route variations were eliminated for good reasons. These exact same reasons are present in the proposed route. There was then a missing phase at looking for suitable techniques and technology to mitigate the South route. DPC would have welcomed working with NWCCP at this point to achieve a mutually acceptable solution. Instead NWCCP jumped straight to the pylon route and DPC has had little choice but to oppose it. NWCCP seem very reluctant to discuss any of the options which would remove the major objections from local residents and businesses.

We welcome NWCCP attempt at mitigation in the National Park. We suspect that there was significant pressure brought to bear on them to back away from pylons. We regard the costs of this as unsubstantiated. We believe there are other options avoiding most of the National Park. HVAC from Eskmeals to Roosecote, for instance. However even the proposed mitigation will be unnecessarily disruptive until National Grid follows the research and development programme outlined in the preceding section. A cut and cover approach with smaller tunnel diameter may be one option, for instance.

Feedback from parishioners gives us the impression that the whole public consultation phase has been a sham. No real note was taken of points raised. Apart from the change inside the National Park, which may easily have been the result of national media coverage, there has been little effect.

We believe this stems from the risk averse, profit driven approach by National Grid. The real cost to the nation and its population are not factored into their sums.

DPC is of the opinion that the current uncertainties with the Toshiba situation and NuGen may offer a breathing space where suitable innovative alternatives can be studied and adopted. This could easily become a protracted delay.

We believe that the financial statements in the PEIR are wholly unsupported by any facts or breakdown. This leads to erroneous conclusions in the minds of decision makers on the relative merits of

differing options. Consequently they will rule out possible acceptable solutions.

We are of the opinion that either the figures in the first round of public consultation were grossly inaccurate, or the current figures are based on inflated assumptions. Some (possibly unwanted solutions) have doubled in 2 years. Either way, this is verging on incompetent.

So how should we trust the current estimates and what confidence does it give to ongoing management forward to the completion of the project?

### **Competitive Tendering**

DPC believes that NWCCP exhibit symptoms of a complacent, unstressed, comfortable parent, National Grid, in a monopoly position. We believe competition would bring greater focus to the needs of both the nation and its inhabitants at a price the country can afford. We read with interest Ofgem statements on its website that the tendering process will increase innovation in onshore transmission networks.

However DPC does recognise risks associated with the adoption of this approach, which would need strong management to counter. We have no evidence that National Grid possesses such a management capability.

The intention to bring this project to the market place via a competitive tendering process raises significant issues and concerns:

#### **Concerns**

**High Stakeholder Interest / Significant Reputational Damage**

#### **Comments**

- The NWCCP has attracted significant local and national interest, which consequently will demand strong stakeholder management.
- Complex delivery contracts with potentially many new or existing commercial players operating within this marketplace will require significant operational control as this project will by its design have many interface issues.
- Local Authorities and particularly Parish Councils may be faced with complex contact points with the appointed contractors, with the consequence that local Residents will experience high levels of frustration and stress.
- The intention to use this project as "Test Pilot" to be market tested by competitive tender in such an environmentally sensitive area where the scope of work is not stable and stakeholder interest is significant. These are the key "ingredients" to deliver an over-run project both on time and cost. This from a Taxpayers view

**work)**

does not make for an attractive proposition and as local residents we will face the consequences.

**Contractual Commitments and Flow Down to all Contractors in The Supply Chain**

- The Development Consent Order will drive agreed commitments which need to be embedded into the contracts and be flowed down to all contractors. Without a strong flow down process, such commitments will be left to interpretation or lost in the delivery of the contract.

**Strong and Experienced Client Organisation**

- Many National Infrastructure Projects have delivered numerous Lessons Learned.
- To drive a complex project with significant interface issues, the Client (assumption this is National Grid) needs a track record of delivering projects to build both internal capability and capacity within the Client Organisation. Choosing a high profile / complex project within a sensitive environment, and attracting significant stakeholder interest, will put the project deliverables at risk and the Client and Sponsor organisations will be left accounting for its actions via a range of public scrutiny committees.

We wish to remain engaged with Ofgem as this project develops, and would like to obtain feedback on Ofgem's consultation. We support PCCG in its wish to meet with you to set out the significant issues our communities will potentially face.

Yours faithfully,

Graham Pitts  
Duddon Parish Council

cc: David Savage  
Chair – Parish Councils Coordination Group