

Millom Without Parish Council

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Chair: Mr David Savage

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Dear Sir / Madam,

Millom Without Parish Council 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 400keV system.

The Parish Council has recently completed a detailed response to the consultation undertaken by the National Grid (NG) for the NWCCP project regarding specific sections E1 and E2.

The members of this Parish Council represent the interests of 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 and their mandated representative(s), which benefits 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.

So addressing each point in turn:

a. Technical Need for Project

The technical need for the project is a dependency on building the proposed Moorside Nuclear Reactor and as such we recognise the need for the connections to this Reactor. Clearly our comments are reserved for the proposed transmission methods and route which National Grid set out in its recent consultation.

b. National Grid Proposal

We of course welcome the view of Ofgem in noting the current preferred route set out by National Grid, in the Preliminary Environmental Information Report which favours the use of a mix of Undergrounding, Pylon Construction and the Morecambe Bay Tunnel compared to Subsea Cables, which Ofgem states as “finely balanced”:

‘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’.

This Parish will be significantly impacted by the current intention to build Pylons in the Duddon Estuary, and 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:

Issue	Comments
Socio-economic	<ul style="list-style-type: none"> • The deployment of a Sub Sea route will enable our Visitor economy to continue to grow within the Furness and Duddon Estuary. • 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.
Environmental Impact	<ul style="list-style-type: none"> • 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.

	<ul style="list-style-type: none"> 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.
Risk Mitigation	<ul style="list-style-type: none"> The proposed construction of the Morecambe Bay Tunnel and its associated engineering risks and uncertainties can be mitigated by the Sub Sea Route.

c. Suitability for Tender

The intention to tender this project via a competitive tendering process raises significant issues and concerns, which requires careful consideration in relation to risks and benefits. The eventual approach to Tendering will bring issues to communities who are facing the implications of a high impact project and who may also be faced with delivery arrangements which are also high risk and unlikely to consider community impact. As a Parish Council, we must be clear that we are opposed to the intention to tender such a sensitive project and the reasons are set out below:

Concerns	Comments
High Stakeholder Interest / Significant Reputational Damage	<ul style="list-style-type: none"> 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 will be faced with complex contact points with the appointed contractors, with the consequence that local Residents will experience high levels of frustration and stress.
Stable Scope of Work (enables the delivery of safe, cost effective and time bound work)	<ul style="list-style-type: none"> 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 does not make for an attractive proposition and as local residents we will face the consequences of the impacts.
Contractual Commitments and Flow	<ul style="list-style-type: none"> 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

**Down to all
Contractors in
The Supply
Chain**

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 also wish to take the opportunity to meet with you directly to set out the significant issues our community faces. We are a member of the Parish Council Coordination Group (PCCG) who is submitting a response to this consultation. We are open to meeting our Parish Council or as a member of the PCCG. We look forward to your support to meet with Ofgem representatives

Yours faithfully,

David Savage

Chair - Millom Without Parish Council

CC:

**Stakeholder
Groups**

Mr R. Leafe, Lake District
National Parks
Mr D.Hunt, Lake District
National Parks
Dr K. Willshaw, Friends of
the Lake District
MrG. Barron, Secretary –
Power Without Pylons

**Copeland
Borough
Council**

Mr M. Starkie, Mayor
Ms P. Graham, MD, CBC

**Cumbria
County
Council**

Ms D. Wood, CEO
Mr G. Kenyon, Lead
Planning Officer
Mr K. Hitchen,
County Councillor

Mr S. Smith, Planning
Lead
Mr G. Scurrah, CBC