

Parish Councils Coordination Group

Ofgem
9 Millbank
London
SW1P 3GE

Mr D Savage
Chair - PCCG
Viclee
Green Hill Road
The Green
Millom, Cumbria
LA18 5AZ

10 February 17

Dear Sir / Madam,

The Parish Council Coordination Group (PCCG) represents 17 Parish Councils, which have come together to:

- **Campaign against 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**

The PCCG 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.

Members of the PCCG have recently completed detailed responses to the consultation undertaken by the National Grid (NG) for the NWCCP project regarding sections which impact on their specific Parishes.

Our members represent the interests of whole communities 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.

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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 many of the Parishes 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:

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.• 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.

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Risk Mitigation

- The proposed construction of the Morecambe Bay Tunnel and its associated engineering risks and uncertainties can be mitigated by the Sub Sea Route.

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

Concerns	Comments
<p>High Stakeholder Interest / Significant Reputational Damage</p>	<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.
<p>Stable Scope of Work (enables the delivery of safe, cost effective and time bound work)</p>	<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.
<p>Contractual Commitments and Flow Down to all Contractors in The Supply Chain</p>	<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 commitments will be left to interpretation or lost in the delivery of the contract.
<p>Strong and Experienced Client Organisation</p>	<ul style="list-style-type: none"> • 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.

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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 to set out the significant issues our communities will potentially face. We look forward to your support to meet with Ofgem representatives.

Yours faithfully,

David Savage

Chair – Parish Councils Coordination Group

Cc:

**Co-ordination Group
Parish Councils**

Aldingham
Askam and Ireleth
Blawith and
Subberthwaite
Bootle
Dalton and Newton
Drigg and Carleton
Duddon
Gosforth
Kirkby - Ireleth
Muncaster
Millom Town
Council
Millom Without
Ponsonby
Seascale
Ulpha
Waberthwaite
Whicham

Stakeholder Groups

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

M.P.

Mr J. Woodcock

**Copeland Borough
Council**

Mr M. Starkie,
Mayor
Ms P. Graham, MD,
CBC
Mr S. Smith,
Planning Lead
Mr G. Scurrah, CBC

Cumbria County Council

Also copied to:
NTIMailbox@ofgem.gov.uk
Ms D. Wood, CEO
Mr G. Kenyon, Lead
Planning Officer
Mr K. Hitchen, County
Councillor