

North West Coast Connections – Consultation on the project’s Initial Needs Case and suitability for tendering

Non-confidential responses from individuals. These responses were not affiliated to any organisation.

Response 1

Dear Mr Norman

You have asked for feedback on your Document on North West Coast Connections and have asked for response to 9 Questions.

My responses are as follows:

Question 1 I agree there is a technical need for the project

Question 2 I agree that 4 X 400kv circuits is appropriate and complies with SQSS requirements

Question 3 I agree the Morecambe Bay tunnel is the best route but I am not convinced of National Grid (NG) costings and do not agree with the haste for a DCO in 2017 for the whole of the Southern section but feel that the Tunnel should be progressed

Question 4 I am concerned that OFGEM seem to have accepted the NG PRC which I feel is flawed. As the No Pylons group suggestion of a partial offshore route (see their website) should be properly investigated by an organisation independent of NG. I am very concerned about the impact pylons would have on migrating Swans and Geese across the Furness Peninsular the partial offshore route would avoid the risk

Question 5 I feel it is too late to tender the North Section unless Moorside is held up. However the Southern Section has plenty of time for Tendering except perhaps the Morecambe Bay Tunnel. So the No Pylons proposed partial offshore route has time to be assessed and tendered

Question 6 Mainly agree with OFGEM views but that the partial offshore route has to be considered

Question 7 If the project was spilt into packages with different delivery parties there would have to be an overall coordinating body probably NG

Question 8 The risks of Tendering can be managed by properly written specifications the allocation of risk should be mainly to NG

Question 9 The modification and extension work has to go ahead in order to complete the NWCC
Thank you for giving myself and others the opportunity to respond to this consultation
I would be grateful if it is possible to keep me informed on the results of this consultation

Response 2

Dear Mr Norman

Response to the Ofgem Consultation “North West Coast Connections – Consultation on the project’s initial Needs Case and Suitability for Tendering”

Ofgem Questions

Question 1: Do you agree that there is a technical need for the project if Nugen's project goes ahead?

Yes. However the decision by NuGen to select Moorside as the proposed site for their large nuclear power station has severely adverse consequences. Firstly the estimated cost of transmitting energy from the site is estimated to be considerably more than the cost of building the power station. Secondly there is no economical route out for the power generated. Thirdly those areas through which the energy will be transmitted will bear the social, economic and environmental and health problems caused by the necessary transmission of energy from the site for many years to come. It is important therefore to find the best and least damaging mode of transmission and it is disappointing and disturbing to find that the National Grid has disregarded this primary duty and has used the extensive and expensive consultation procedures to promote their preferred option of overhead power cables. If the projected power station at Moorside does take place it is important that the long term damage to the areas affected should be minimised and that all options should be considered. Such considerations have been conspicuously absent from the consultations, which have been carried out apparently with the sole purpose of promoting their preferred option for overhead 400kv lines, the maintenance of which in remote and exposed areas will be costly and disruptive and the danger from their huge magnetic fields is unknown.

If the project at Moorside does not proceed there is no justification at all for a transmitting system.

Question 2: Do you agree that connecting the Moorside site using four 400kV circuits is appropriate and compliant with SQSS requirements?

This is a question which the National Grid should have asked and to which it ought to have included as an important part of its consultation process. In the absence of detailed information as to the consequences attending these matters it is impossible to give an informed reply. I certainly do not think that the pylon route proposed and promoted by the National Grid is acceptable. It would blight the areas affected and the possible alternatives have been dismissed without investigation or explanation.

The National Grid should have raised this question of the appropriate means of transmission as an important part of their consultation process but this and other issues necessary for a proper understanding of the issues involved have been entirely overshadowed by the undue emphasis on the pylon option.

The consultation has been far from impartial and has by failing to investigate and to provide the necessary information about the advantages of Subsea Cables and other alternatives, it has misdirected those whom it was intended to help and has inhibited any informed response. Site visits and detailed correspondence have taken place regarding the possible sitings of individual pylons as if the pylon option was inevitable.

The sub-sea route has been dismissed without consideration or consultation although it offers the best and fairest solution. It has never even been mentioned, so far as I can recall at any of the numerous consultations meetings which I have attended. Similarly, due to the restrictive nature of

the consultation, concerns as to the health risks, as to the disruption to the rural road network and as to the ongoing economic and social costs which would inevitably, ensure from the erection and presence of 400kv pylons has been ignored.

Response 3

Dear Mr Norman

My primary objection to the North West Coast Connections project of National Grid is the absolutely astounding arrogance of National Grid and many of the NWCC employees.

If you ask the Parish Council of Kirkby in Furness, you will hear them say that in the so called "consultations" of the past 5 or 6 years, the Parish Council has clearly stated that they do not want the proposed "wirescape" around their village. Their comments year after year in these so called "consultations" have been ignored. Maybe NG will move a monster 47 meter pylon by a few meters but overall, this "project" has been imposed. The so called "Public Consultation" as been a TOTAL SHAM !

I spoke to **Redacted- Personal Information** at the NWCC information session in Millom and I asked him for some information on the costs of laying offshore cable from Bootle to South Walney. I handed to him my letter with this request. This alternative would eliminate monster pylons around the Duddon Estuary. **Redacted- Personal Information** said that he would consider my request. I politely said to him that I wanted a reply with the requested information and he replied that he would consider my request. I said that I wanted facts and figures not a "consideration".

At the NWCC information session at Kirkby in Furness, I spoke to **Redacted- Personal Information** and said to him that moving electricity on 47 metre high pylons from a remote hydro electric dam in a place such as Siberia to an industrial site might be acceptable as few people would be effected. I emphasized to him that SOUTH CUMBRIA WAS NOT SIBERIA.

I attended the NWCC information session at Roose. I asked to speak to someone about the offshore options that NWCC had rejected. I was introduced to a man who claimed to have laid offshore cables all over the world. He was obviously engaged by NWCC for the day to answer questions. I was absolutely astonished to hear this man tell me that it was virtually impossible to lay cables offshore between Bootle and South Walney. There are hundreds of subsea cables in that area connecting windturbines to shore.

In my opinion, this man was engaged by NG for no other reason than to discount any all ideas of the offshore cable options.

One specific concern I have is the accusation that National Grid's NWCC reject offshore cables because they would not get the work and income to maintain the offshore cables. If the cables went on 47 meter pylon, NG has a monopoly to maintain them for the life of the line...perhaps 50-60 years. THIS IS WRONG !!!

I totally support the Ofgem position that parts of the Southern Connection are put out to tender. I specifically want Ofgem to put out to tender the offshore cable option between Selker Bay near Bootle and South Walney Island. This option is proposed and costed in the website www.nopylons.co.uk.

I am most impressed by the work and reports of Friends of the Lake District (FOLD). In essence, FOLD

have drawn attention to the fact that National Grid have made a mockery of Holford Rules. I think that it is totally wrong for National Grid to "presume" grandfather rights. It is totally wrong for National Grid to assume that it is acceptable and somehow "their right" to replace the existing 132KV transmission line with pylons twice as tall, twice as wide and seven times the volume. THIS IS WRONG, WRONG, WRONG !!!

I urge Ofgem to insist that the Southern Connection goes out to tender and that NG are forced to reconsider their proposal for monster, hideous pylons around the Duddon Estuary, Whicham Valley and the Furness Peninsula. Offshore cables from Selker Bay to South Walney is a far, far better option.

Response 4

Please record the following responses to your consultation.

Regarding competitive tendering: I believe that the NWCC project should go out to competitive tender - if costs were not transparent through such a process then how could the public be truly confident that best value for money was being achieved (fully understanding that cheapest and best value for money can be two entirely different things)?

I have scant confidence in National Grid process so far re selecting their preferred option. On what I can only say is a pure cost basis they have pursued an agenda of implementing much of the route onshore. The rejection of HVAC offshore (buried cables) has not been adequately explained at any stage, costings are vague for this option and it was not considered as an option early on in the consultation - despite it now being agreed as a viable option. In fact costings given to the public were all very vague and never ever expressed as how much extra it would be to the average domestic consumer on their bill. This would have had more meaning for the average member of the public than rounded up simplified total project costs. I asked for this at every stage even as an approximation but it was never forthcoming and I believe a deliberate obstruction. How can you evaluate cost versus benefits properly if you do not have reasonable information to base it on? With extreme pressure NWCC agreed to underground onshore the cables passing through the National park but have not agreed to any mitigation for the setting of the National Park even though they are duty bound to take this into consideration and have done elsewhere in the country. It is not unreasonable to expect them to have to provide extensive further mitigation to their proposed route around the Duddon Estuary in the setting of LDNP. Because of this then I believe the economics are shifted towards an offshore HVAC option where the costs are more easily estimated and controlled than the extensive tunnelling options currently on the preferred route. The Morecambe Bay tunnel easily has the potential to exceed the estimated budget once work has commenced since ground conditions may be more complex than foreseen. The risks of major budget over run were not covered at all in the consultation process for any of the options. I believe from reading your consultation documentation that you are already leaning towards this view yourselves. The costs of option life time maintenance were not discussed either. A serious omission. You state that National Grid have carried out "analysis of consumer willingness to pay for visual mitigation". During a considerable number of consultation event that I have attended since the start, there has been a steady refusal to provide any meaningful numbers on what infrastructure costs would mean to consumer bills and consequently it would not be too strong to say that I believe National Grid wish to suppress this information in order to sway everyone to choose their own preferred option.

Given the current delays in the NuGen project for the power station at Moorside, indeed it does at this stage seem it may possibly not go ahead, I refute that further consideration of options is likely to

delay the project overall. It means you actually have extra time rather than time pressure and believe it should be made use of to rectify the shortcomings of the consultation process so far. The capital cost of NWCC will be very large no matter which option is finally chosen, but apart from the money on the bills of consumers there will be other costs borne by the communities and landscape for many generations to come. I acknowledge that Ofgem have a responsibility to ensure that consumers money is spent wisely on infrastructure, however there is also a duty to make sure that the project will meet the requirements of protecting the LDNP, its setting and the other areas of high landscape value. I believe money should be spent to make sure future mitigation such as the money you have granted to the tune £500M, to allow National Grid to underground short sections of existing overhead line in other national parks, is NOT required, when people are faced with the reality of the giant pylons. Get it right first time.

Considering the wholesale guaranteed price per unit to the nuclear power providers is going to be double what it is now, the extra cost to provide a solution that is acceptable to all those that are going to be affected is justified as it will be small in comparison. Capital costs are not the only thing that matters in such a valued landscape and morally why should the sparser populations of the Northwest have to suffer when the majority of consumers live elsewhere and the costs of loss of power due to long transmission lines have not been factored in or if they have been not fully explained to the populations that will have to suffer the consequences of National Grid's plans? I think a total off shore HVAC route, or a partial HVAC route from Kirksanton to Rosall on top of the undergrounding in the LDNP, offer the best solutions as they avoid pylons altogether in the setting of the national park and have a more stable cost basis than the tunnel under Morecambe Bay. I would request that Ofgem supports one of these.

Response 5

Dear Mr Norman

I write as a resident in Cumbria, living in an area affected by the NGET proposals for a new transmission route from the projected Moorside power station. I have read your Consultation document and the attached Report from TNEI/Pöyry and respond herewith to your invitation to contribute.

1. In general terms I am positive in support of increasing nuclear power generation and am ready to be persuaded of the suitability of the proposed Moorside location.
2. I do not share Ofgem's initial conclusions on the merits of the NGET routeing scheme.
3. Having acknowledged that the Cumbrian Coast at present lacks any adequate infra-structure to meet the requirements of a Moorside power station, NGET has opportunistically presumed 'grandfather' rights over the existing ENWL 132kV pylon route.
4. The route of the 132kV line was determined at least 60 years ago when there was a desperate need for a reliable electricity supply, a less developed concern about the environment, no Holford Rules to guide planners, an infant National Park and less of a reliance in this locality on the tourist industry. NGET have been seriously negligent in dodging the requirement to have proper regard for these factors in planning a new piece of the national power transmission network.
5. Faced with the reality that using the ENWL alignment involves conflict with two sections of the LDNP, expensive mitigation in terms of burying the transmission cables for 15.1km between Waberthwaite and Silecroft and the construction of a tunnel to carry the cables for 22km under

Morecambe Bay is proposed. No regard whatever has been taken by NGET to the effect of their proposals on the setting and landscape adjacent to the National Park.

6. No other significant mitigation measures are envisaged in NGET's proposals and it appears that OFGEM is content that ensuring an acceptable standard of environmental protection can be left to amendments argued through the subsequent planning process and not regarded as within the core costings of the NGET proposals.

7. NGET's proposals show no recognition of the shortcomings of the ENWL pylon route other than a short deviation away from the village school at Kirkby. NGET overlook the manifold inappropriateness of the visual detriment of 40m pylons north of Waberthwaite, through the Whicham Valley, across the Duddon floodplain, over Foxfield ridge, through Duddon Mosses SAC, scarring the high ground above Ireleth and adjacent to the hugely popular South Lakes Safari Zoo near Dalton, and dominating the Furness skyline from Lindal to Leece. These deficiencies are too substantial and significant in cost terms to be disregarded at the Initial Needs Case stage.

8. The hazard of creating a 'wirescape' situation, of which Halford warned, is almost certain to result at Kirkby and Lindal if the NGET scheme is adopted.

9. NGET's preference for the ENWL route appears to have caused their less than robust consideration of subsea options. Accepting that NuGen dissent from the adoption of HVDC technology and the problems of crossing the Eskmeals firing range exclusion zone, the option of taking the transmission cables offshore at Bootle or Kirksanton to land at Walney, or even continue across Morecambe Bay, would eliminate the need for a pylon route between Silecroft and Barrow. [It would also remove the need for an ENWL trident line to Millom.]

10. I find it hard to accept the verdict of the TNEI/Pöyry Report (para. 2.1.4) "that NGET have considered all credible Connection Options, all credible Strategic Options and all credible Routeing Options" and hope that OFGEM will find the NGET Initial Needs Case unsatisfactory.

Response 6

Please record the following responses to your consultation.

I believe that the NWCC project should be subject to competitive tender - if it were not I do not see how consumers can have confidence that costs are being controlled and best value being delivered.

I have serious concerns about the National Grid process so far in selecting their preferred option. Throughout the process they have pursued an agenda of implementing much of the route onshore. Their rejection of HVAC offshore (buried cables) has never been clearly explained, their costs are vague for this option and it was never offered as a potential during their first public consultation stages - despite the fact that they now agree it is a viable option.

It is highly likely that they will have to provide extensive further mitigation to their proposed route around the Duddon Estuary in the setting of LDNP. If this is so the economics are likely to shift in favour of an offshore HVAC option whose costs are more easily estimated and controlled than the extensive tunnelling options currently on the preferred route. The Morecambe Bay tunnel has the potential to grow extensively in cost once work has commenced since ground conditions may be more complex than foreseen.

You state that National Grid have carried out "analysis of consumer willingness to pay for visual

mitigation". In the many consultation events I have attended National Grid have repeatedly refused to provide any meaningful numbers on what infrastructure costs would mean to consumer bills both domestic and industrial. Without such accurate worked examples it is impossible for people to draw real conclusions, I believe National Grid wish to suppress this information in order to further the case for a route which they prefer.

Given the current delays in the NuGen project (e.g. Toshiba involvement in future nuclear projects, acceptance of proposed reactor design etc.) I do not accept your statement in 2.35 that further consideration of options is likely to delay the project

The cost of NWCC is huge - whatever option is used - but the project will have an effect on the communities and landscape for many generations to come. Whilst OFGEM have a responsibility to ensure that consumers money is spent wisely on infrastructure you must also ensure that the project will meet the requirements of protecting the LDNP, it's setting and the other areas of high landscape value. I do not believe that you should accept a route which would result in future additional spend by consumers to add mitigation at a later date. e.g. your use of £500M to allow National Grid to underground short sections of existing overhead line in other national parks is inconsistent with allowing them to erect new pylons on their proposed route for NWCC.