

Ulpha Parish Meeting

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Cumbria,
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19th February 2017

Ofgem,
9, Millbank,
LONDON,
SW1P 3GE
Dear Sir / Madam,

The Parish Meeting is:-

- campaigning against the National Grid plan to erect huge pylons within the narrow coastal plain on their preferred route.
- To enable it's voice to be heard as part of the consultation.
- To keep Parishioners informed and enable them to understand and express their views.

We wish to respond to respond to the North West Coast Connections Project - **on the projects 'Initial Needs Case and suitability for tendering' being undertaken by yourselves.** Especially to comment on the 400KeV connection south of Moorside.

We have a close link with our community, residents, businesses and visitors understanding how the community functions and its various needs, maintaining community cohesion and to improve wellbeing and quality of life. In all why our area is special within the UK. Our knowledge and understanding we believe shows that we can be considered as an **Interested Party in the Ofgem Consultation.**

Ofgem Consultation Themes

- **Is there a technical need for the project?**
- **How National Grid have reduced their options to the one being taken forward to the planning consultation**
- **Is the project or sections of it suitable for competitive tender?**

We 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:

Concerns

Socio-economic

- The preferred route of pylons will have a considerable long term impact on the quality of our community’s lives which has been included in our response to National Grid (NGET).
- The use of the sub Sea route will enable continuation and expansion of our visitor numbers in the area of the Duddon Estuary.

Environmental Impact

- The Sub Sea route will have a greatly reduced impact on our transport system with a greater environmentally friendly approach together with greater safety for road traffic.
- This route will also mitigate significant environmental impact by protecting land and retaining its traditional use for farming, residents and visitors.

Risk Mitigation

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

Competitive Tendering for the project brings significant concerns and issues

Concerns

High Stakeholder Interest & Significant Reputational Damage

- The NWCCP has raised considerable national and local interest requiring the need for strong stakeholder management.
- Local Authorities/ Parish Councils will be faced with complex relationships with contractors, with local residents experiencing high levels of stress over an extended period.

Stable Scope of Work (enables the delivery of safe, cost effective and time bound work).

- It is significant that the intention is to use this project as a ‘Test Pilot’ by competitive tender where the scope of the work is not fixed and in a very environmentally

sensitive area with high stakeholder interest. The potential for late delivery and increased cost is likely. From a tax payers standpoint this is not an attractive proposal and our local residents will face the results of the impact.

Strong and Experienced Client Organisation

- Many National Infrastructure Projects have created lessons to be learned.
- The Client (assumed to be National Grid) needs a good track record for delivering projects.

We wish to remain engaged with Ofgem as this project develops and would like to obtain feedback on Ofgem's consultation.

Yours sincerely,

Anthea Jones
Chairman

Copies to:-

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

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

Stakeholder Groups

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

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