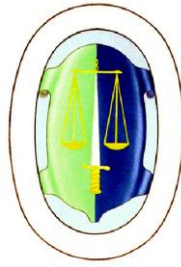


DALTON WITH NEWTON TOWN COUNCIL

Town Clerk
Mrs H F Thomson



Town Hall
Station Road
Dalton in Furness
Cumbria
LA15 8DT
Tel 01229 464000/466446

20 February 2016

Ofgem
9 Millbank
London
SW1P 3GE

Dear Sir/Madam

Dalton with Newton Town Council (DTC) is a member of The Parish Council Coordination Group (PCCG) which represents 17 Parish Councils in the North West of England that have come together to:

- campaign against National Grid's plans to build large scale pylons within the current proposed route corridor
- create a stronger voice within the consultation process
- communicate with and motivate constituents to engage with the National Grid plans and express their views.

The PCCG has already responded to Ofgem's consultation (North West Coast Connections Project (NWCCP) - Consultation on the Project's Initial Needs Case and Suitability for Tendering). Dalton with Newton Town Council wishes to personally comment on the southern connection (Furness area) of the 400kV system.

We have recently completed a detailed response to the consultation undertaken by the National Grid (NG) for the NWCCP project regarding the section which impacts on our Parish.

We represent the interests of our whole community and understand the needs of different groups within it (such as young and elderly people, local business and tourism). We strongly believe and assert that this knowledge is critical to NG's decision-making for options on the NWCC project as this is their only opportunity to 'get it right'.

It is in our interests to speak on behalf of our community to identify real improvements, maintain a sense of purpose and belonging, protect sensitive local businesses (agriculture, small farming and tourism reliant companies e.g.. The South Lakes Wild Animal Park), and maintain the community strength and character that makes our area unique. 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 welcome this view as, for DTC (and for many of the Parishes impacted by the current intention to build pylons around the Duddon Estuary and through Furness), the Sub Sea route would deliver enhanced benefits beyond the technical and system issues which are set out in the consultation.

DTC believe that the offshore option is the most suitable for all parties as there would be no disruption to the visual landscape, farming and, traffic/roads, residents, businesses or the many farm (and exotic) animals in this area. Further, we believe that NG's current proposal is environmentally harmful, and completely irresponsible when there is a viable and well-achievable alternative such as the offshore HVAC cable option. National Grid have the opportunity with this project to set an example of environmentally conscious infrastructure construction.

We believe it is imperative that the following issues are considered by Ofgem:

1. National Grid's wholly inadequate and poorly managed consultations, and timescale for response. For example, Dalton has a population close to 8200, making it the second largest in the borough, and will be directly affected by this project. Yet we were informed by NG that Dalton was not deemed important enough to receive a consultation 'Drop In' event for the public.
2. The inadequacy of NG's estimates and costings for alternative options put forward ie Sub Sea route, and the lack of sound reasons or clear information as to why any option other than their favoured pylon route could not be considered.
3. Socio-economic: The deployment of a Sub Sea route would enable our visitor economy to continue to grow within the Furness and Duddon Estuary area. NG's preferred route of Pylons would have a long-term detrimental impact on the quality of our residents' lives, which is of significant concern, as set out in the Town Council submission to NG.
4. Environmental Impact: The use of the Sub Sea proposal would mitigate the significant environmental impacts and protect and retain the land for both rural and recreational benefits. Additionally, there would be a significantly reduced impact on our already strained transportation system, with enhanced safety for road users.
5. Risk Mitigation: The proposed construction of the Morecambe Bay Tunnel, and its associated engineering risks and uncertainties, could be mitigated by the Sub Sea Route.

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

- The NWCCP has attracted significant local and national interest. Consequently, strong stakeholder management will be required to avoid possible reputational damage.
- 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.
- The intention to use this project for market testing by competitive tender. This is an environmentally-sensitive area, the scope of work is not stable and stakeholder interest is high. These are key factors in delivering an over-run project both on time and cost. From a Taxpayers view, this does not make for an attractive proposition and as local residents we will face the consequences of the impacts.
- The Development Consent Order will drive agreed commitments which need to be embedded into the contracts and flow down to all contractors. Without a strong flowdown process, such commitments will be left to interpretation or lost in the delivery of the contract.

- 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 accountable for its actions via a range of public scrutiny committees.

We wish to remain engaged with Ofgem as this project develops, and to obtain feedback on Ofgem's consultation. We would also welcome the opportunity to meet with you to discuss the many issues our community will potentially face. We look forward to your support.

Yours faithfully,

Nick Perie

Nick Perie

Chairman

Dalton with Newton Town Council

Cc:

Parish Councils Coordination Group

Mr D.Hunt, Lake District National Parks

Dr K. Willshaw, Friends of the Lake District

Mr G. Barron, Secretary – Power Without Pylons

John Woodcock MP

Tim Farron MP

NTIMailbox@ofgem.gov.uk