

Dear Keith

I am emailing on behalf of “Power Without Pylons” (PWP) with reference to the National Grid NWCC project and Ofgem’s role in it - we have exchanged emails about this project previously.

We have just become aware of your consultation on “suitability for tendering” for this project.

PWP has stated its aims as follows:

“Power Without Pylons is a local group formed to campaign for a pylon-free solution to connecting the proposed Moorside nuclear power station to the UK electricity grid. The group accepts the need for diverse power generation and welcomes the contribution Moorside will make to the local economy, but seeks to protect the unique landscapes of the Lake District.”

We set up the group in early 2015, and have been recognised by National Grid (NG) as a stakeholder group, and have attended several stakeholder reference group events.

Along with the Lake District National Park Authority and Friends of the Lake District, we believe we have had some influence on NG’s decision to propose the undergrounding in the National Park. However, NG is still proposing giant pylons bordering the National Park in the Whicham Valley, around the Duddon Estuary and across the Furness peninsula.

We were extremely surprised to note the omission in your consultation document of any reference to the Duddon Estuary.

You should be aware that this landscape is just as valuable as that within the Park, and is regarded as the “setting” of the Park. The Park boundary in the Whicham Valley is completely arbitrary – there is no apparent difference in landscape, and NG has cynically positioned the pylons right next to the boundary – less than 10m away in some places.

This is completely unacceptable in such a wonderful landscape.

You are probably aware that we have achieved some success in raising awareness in the local and national press, for example:

<http://www.telegraph.co.uk/news/2016/12/06/william-wordsworths-descendant-campaigns-save-beloved-lake-district/>

There is now a huge level of opposition here, and around the country. There were 43 million visitors to Cumbria in 2015 – they do not want to see the landscape scarred by giant steel monstrosities.

I was very interested to read the comments in your consultation document on project alternatives:

1. Complete Offshore HVDC:

a. Technical difficulties: you mention “untested technology for the connection of a nuclear power station”. NG have raised this issue, but we have good reason to believe that these concerns have been exaggerated. Our view is based on information from the Office of Nuclear Regulation, Siemens (HVDC converter station mfr), the WYG consultancy report, and a report we have had commissioned from Dr B Chaudhuri of Imperial College. All of these sources lead us to believe that that these technical difficulties do exist, but that they are not very significant. The CEO of NuGen stated that the use of HVDC would delay the project by 4 years. Dr Chaudhuri believes it should be no more than 1 year. We have recently requested more information from both NG and NuGen in order to improve our understanding of the

situation, but none has been forthcoming. In 2014, there was overwhelming support for this option from respondents to the consultation. We still believe it is by far the best option. NG has never stated that it is not feasible.

b. Cost: - the cost of this option was originally estimated by National Grid (NG) at £1.8bn. Now their estimates have almost doubled to £3.5bn. We have requested an explanation for this, but, again, none has been forthcoming. Dr Chaudhuri does not believe that this increase is justified. Examination of alternative solutions is a necessary and legitimate part of the planning process. We, and other potential participants in the planning enquiry, cannot satisfactorily make a proper challenge to NG's plans without proper information.

2. Offshore HVAC Kirksanton-Rossall: you mention "Offshore subsea AC cables going around Morecambe Bay and landing on the Heysham peninsula" . I assume that this is the Kirksanton-Rossall route mentioned by NG in their document 2.8.9. In our view, this is an acceptable second-best alternative, as it avoids the long stretch of pylons mentioned above. Undergrounding onshore has its own problems, of course, and many people are not happy about that solution. We note that your own view appears to differ from NG's regarding this option.

There is also another, new, factor relating to this project. The 132kV Trident line proposal, from Barrow to Silecroft, specified in the current project plan is now redundant. This was only required for the proposed Haverigg wind farm. The wind farm is almost certainly not going to get built now, due to the withdrawal of onshore wind subsidies, and the developers have withdrawn their request to Electricity North West (ENW) for connection.

We are requesting that OFGEM supports one of the following options:

1. The complete Offshore HVDC option for the southern route Moorside-Heysham. This is not a major problem in planning terms, as it would not be considered as an NSIP. The southern route could be withdrawn entirely from the NSIP if this option were to be adopted.
2. The re-run of the entire 2016 stage of the NG consultation, because:
 - a. There is a suitable alternative, the Offshore HVAC Kirksanton-Rossall option, which has not even been offered for public consultation. NG has done a study on this option and regards it as feasible. OFGEM itself obviously regards this option as an equally satisfactory option, if not preferable. It ought, therefore to be consulted upon in the public arena.
 - b. The consultation details include details of the 132kV Trident line. This would therefore appear to invalidate the consultation entirely.

I assume you are not directly involved in the planning process, but nevertheless I am sure your role is very influential in this situation.

I will copy this to the Planning Inspectorate for their comments.

Regards

Graham Barron
Secretary
Power Without Pylons