

Dear Examining Authority,

We note that in submission R2-041, the Applicants have not included in their document S_D2_8 Applicants' Draft Itinerary and Plan for ASI - Rev F01 and the ExA formal Accompanied site inspection schedule, issued on 19th June 2025, any proposal to inspect the public and private sites relevant to the enabling infrastructure associated with "the Northern" Material Alternative route. This route would utilise existing energy infrastructure to connect electricity generated by the Morgan and Morecambe offshore arrays to Penwortham and, ultimately, to national consumers, despite our suggesting it. In REP1-187, NPL Group, the principal landowner of the Hillhouse Technology Enterprise Zone (HTEZ), has already offered to facilitate a site visit for the Examining Authority to its 138-hectare site.

This offer remains open, should the ExA wish to take this up.

Such a visit would enable direct appraisal of the following:

- Feasible access route options from the HTEZ to the Irish Sea shore;
- Extensive, designated development land already provisioned with highways and utilities infrastructure suitable for hosting both Applicant and Transmission Operator substations;
- Immediate access to the existing 400kV National Grid infrastructure, forming part of the R4 Penwortham-Stanah Group, which connects directly to Penwortham and the wider grid.

These factors demonstrate how the environmental, community, and business impacts of the Applicants' preferred route could be entirely avoided.

The use of this already provisioned site and infrastructure would also eliminate the need for approximately 60km of underground cabling and associated Green Belt encroachment—representing a significant reduction in environmental impact, delivery time, risk, and cost. It is estimated that avoiding this unnecessary infrastructure could prevent up to £900 million in costs being passed to consumers. This aligns directly with the obligations under the Electricity Act 1989 and the Energy Act 2023 for delivery of efficiency and economy by licensed undertakers and the Secretary of State.

In light of the above, we respectfully request that your schedule for Accompanied Site Inspections (ASIs) include:

- Rossall Beach, as the potential landfall site; and
- Hillhouse Technology Enterprise Zone, as a potential site for hosting transmission infrastructure with existing access to Penwortham and the national grid.

Yours sincerely,

Angus Walker