

Dear Examining Authority,

Reference : Written Questions Q2:1.2.1 and 1.2.2

Continuing Imbalance of Harms and inadequate consideration of the Obviously Material Alternative

Thank you for visibility of your questions, which we note and, as a result, would like to communicate that we reserve our position to provide further inputs regarding the overwhelming imbalance of unresolved unacceptable harms and the inadequate consideration of the obviously material alternative, prioritising the utilisation of already provisioned infrastructure. This is consistent with the advice to Government by NESO in respect of the Clean Power 2030 Action Plan (see section 5.2 at this link - <https://www.neso.energy/document/346651/download>).

The applicants and National Grid, both seem to rely on making reference to the 2022 Holistic Network Design Review (HNDR) to support their claims that any form of consistent assessment was undertaken in assessing Stanah/Hillhouse Technology Enterprise Zone (HTEZ) and Penwortham/Greenbelt. However, the HNDR is completely silent on the assessment of Stanah, nor any presentation of a consistent comparison, using the declared Offshore Transmission Network Review (OTNR) objectives. A simple word search of the HNDR for "Stanah" evidences that there are no references, never mind assessments (see link <https://www.neso.energy/document/262681/download>). If such an assessment had been conducted, then logically, the records showing such a consistent comparison should be readily capable of being made available. To date, that appears to remain not to be the case.

Accompanied Site Visit to Hillhouse Technology Enterprise Zone

It is noted that in spite of requests from you for sites to be visited, you do not appear to have yet taken up the option for an accompanied site visit into the privately owned land that comprises the Hillhouse Technology Enterprise Zone (HTEZ) that provides : open space access to the Irish seashore, avoiding the Ribble & Alt and other SPAs and MCZs; connection to the existing National Grid infrastructure via Stanah including to Penwortham and also consumers nationally; and providing a fully serviced and nationally designated development 138 hectare site to host further transmission infrastructure including that of National Grid and Developers of Morgan, Morecambe and Mooir Vannin projects in an efficient, coordinated and economic manner, with drastically less emission, ecological, environmental, community, community and safety harms. This seems at variance to the multiple representations, including those of the site owner NPL and local Wyre Borough Councillor. We would welcome clarification from you as to why that is.

Yours sincerely

P. Collins

Chair, Lancashire Association of Local Councils, Fylde Area Committee Energy Working Group

Councillor, Fylde Borough Council

Councillor Newton with Clifton Parish Council