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Head of Energy Infrastructure Planning,
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(Sent by email to energyinfrastructureplanning@energysecurity.gov.uk)

14 August 2025

Subject: Request for a direction under section 35 of the Planning Act 2008

Dear Mr Wagstaff

EnergyPathways PLC ("**EPP**") is developing a project known as the Marram Energy Storage and Decarbonisation Hub Project ("**MESH**"). Attached to this letter is a request for the Secretary of State to give a direction under s.35(1) of the Planning Act 2008 that certain parts of MESH be treated as development for which development consent is required under that Act (the "**Application**").

The main elements of MESH are: (1) an offshore flexible power generation and compressed air Long Duration Energy Storage ("**LDES**") facility; (2) an offshore gas extraction and storage facility (or alternative natural gas supply infrastructure, as further explained in the Application); (3) a methane pyrolysis hydrogen production facility (onshore); (4) a clean ammonia and graphite production facility (onshore); (5) an offshore hydrogen storage facility; and (6) pipelines and cables that will link the elements of the Project to each other, to adjacent offshore wind farms, and to the National Electricity Transmission System and National Transmission System for gas. MESH is to be located in the East Irish Sea off the coast of Lancashire and at Barrow-in-Furness.

MESH has been conceived as a unified whole, and its different elements will be mutually complementary (for example, by providing energy / fuel or feedstock to each other), as further described in the Application. Together, they constitute an integrated project in the field of energy.

Accordingly, EPP wishes the process of obtaining the necessary public law authorisations for MESH to be pursued, as far as possible, in a unified way. As explained in the Application, MESH's elements 2, 5 and 6 include some infrastructure that requires authorisation under the Petroleum Act 1998 or Energy Act 2008, and the generating plant in element 1 may be a nationally significant infrastructure project in its own right (which in turn may mean that other parts of that element would be treated as "associated development"). However, EPP believes that a s.35(1) direction would provide the most effective means of co-ordinating the authorisation of elements 3 and 4 of MESH with that of those parts of elements 2, 5 and 6 that do not fall under the Petroleum Act 1998 or Energy Act 2008, and with the authorisation of element 1 (even if parts of that element are ultimately the subject of an application for a development consent order in respect of an NSIP comprised within it).

EPP also believes that maximising the application of the Planning Act process to MESH in this way will greatly facilitate the process of making the necessary financial, commercial and engineering arrangements to ensure that all the elements of MESH are completed in a timely manner.

As further explained in the Application, the objectives of MESH are extremely well aligned with HM government's energy and climate change policy priorities, as regards both increasing the security and affordability of decarbonised energy supply and growing and decarbonising key sectors of UK industry. For example, MESH offers very long duration energy storage at lower cost than pumped hydro projects and the production of clean hydrogen at prices lower than can currently be achieved by electrolysis or thermal reforming of methane with CCS. More than one of MESH's elements would be first-of-a-kind deployments, at full commercial scale, of technologies that have considerable potential to be replicated in the East Irish Sea, elsewhere in the UK, and further afield. Collectively, they are uniquely well-placed to enable the UK and other fossil-fuel producing areas to turn the rhetoric of "energy transition" and "finding synergies between "old" and "new" energy" into a reality.

If you have any questions about MESH or the Application, or if your team would find it helpful to be given a presentation about MESH, please do not hesitate to get in touch with me at ben.clube@energypathways.uk.

Yours sincerely,

Chief Executive Officer
EnergyPathways plc