



# **Hinkley Point C Connection Project Material Change Programme Document**

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**HCP-DCO-001**

**Version 2.0**

**nationalgrid**

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# 1. Introduction

## 1.1 Introduction

- 1.1.1 This Programme Document has been prepared by National Grid Electricity Transmission plc (NGET) as a requirement under the Planning Inspectorate's (PINS) Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus in respect of the Hinkley Point C Connection Project Material Change Application.

## 1.2 Purpose and Structure

- 1.2.1 This Programme Document sets out the timetable and describes the activities necessary for an effective pre-application process.
- 1.2.2 This Programme Document is structured as follows:
- Section 2: Background to the Hinkley Point C Connection Project Material Change
  - Section 3: Pre-application service from PINS
  - Section 4: Expected submission timeframe
  - Section 5: Timeframe of the pre-application process
  - Section 6: Main issues for resolution
  - Section 7: Stakeholder engagement
  - Section 8: Pre-application risks

## 2. Background to the Hinkley Point C Connection Material Change Project

### 2.1 The 2016 Development Consent Order (DCO)

- 2.1.1 National Grid Electricity Transmission (NGET) (the Applicant) is the owner of the electrical transmission system in England and Wales. The transmission system operates at voltages of 400kV and 275kV, connecting electricity generators to substations where the high voltages are transformed into lower voltages for distribution to homes and businesses.
- 2.1.2 NGET gained development consent from the Secretary of State for Energy and Climate Change<sup>1</sup> for the Hinkley Point C Connection Project (HPCCP) on 19th January 2016 through The National Grid (Hinkley Point C Connection Project) Order 2016 (as amended 2017) (the 2016 DCO).
- 2.1.3 The HPCCP comprises a new 57km 400kV electricity transmission connection between Bridgwater, Somerset and Seabank Substation, north of Avonmouth. The principle elements of the Project are:
- Installation of a 400kV overhead line (OHL).
  - Installation of 400kV underground cables.
  - Modifications to existing OHLs at Hinkley Point, Somerset.
  - Construction of three 400kV Cable Sealing End (CSE) compounds along the route of the connection.
  - Construction of a 400/132kV substation at Sandford, North Somerset.
  - Extension of the existing 400kV substation at Seabank.
  - The removal of existing 132kV OHLs and the construction of replacement 132kV OHLs and 132kV underground cables.
  - Extensions/modifications to existing 132kV substations at Churchill, Portishead, Avonmouth and Seabank; and
  - Associated development, necessary or expedient for the purposes of construction or maintenance for example, temporary access roads, culverts, bridges, highway works temporary construction compounds, scaffolds, work sites and ancillary works.
- 2.1.4 The Project fell within the administrative boundaries of Bristol City Council, North Somerset Council, Sedgemoor District Council, Somerset County Council, Somerset West and Taunton Council and South Gloucestershire Council.
- 2.1.5 Since the 2016 DCO was made, some of the host local planning authorities (LPAs) have merged. In April 2023 the relevant district councils of Sedgemoor, Somerset West and Taunton Council and Somerset County Council merged to form a new unitary authority 'Somerset Council'.

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<sup>1</sup> Now the Secretary of State for Energy Security and Net Zero

## 2.2 Overview of the Material Change

- 2.2.1 The proposed HPCCP Material Change Application seeks consent for permanent access infrastructure for the purpose of maintenance and operation of the Project. This includes amendments to the authorised works, powers and land rights set out in the 2016 DCO.
- 2.2.2 Having regard to The Department for Communities and Local Government, The Planning Act 2008 ‘Guidance on Changes to Development Consent Orders’ December 2015 (The 2015 Guidance), the proposed changes are considered to be material because:
- There may be a need to compulsory acquire additional land rights for maintenance access and operational use; and
  - An updated Environmental Statement and Habitat Regulations Assessment may be required.

## 2.3 Relevant Legislation and Guidance

- 2.3.1 The relevant legislation for making a material change to a DCO is set out below:
- The Planning Act 2008: Section 153 and Schedule 6 (Changes to, and Revocation of Orders Granting Development Consent); and
  - The Infrastructure Planning (Changes to, and Revocation of, Development Consent Orders) Regulations 2011 as amended (“the Changes Regulations”).
- 2.3.2 The relevant guidance for making a material change to a DCO is set out below:
- The Planning Act 2008 ‘Guidance on Changes to Development Consent Orders’ December 2015.

## 3. Pre-application service from PINS

### 3.1 Pre-application Service

- 3.1.1 The pre-application services provided by PINS will be subject to discussion and agreement. This Programme Document will be updated to take account of advice received.
- 3.1.2 PINS do not currently seek to recover the cost of pre-application services in relation to Material Change applications under Schedule 6 of the Planning Act 2008. The Applicant intends to apply the guidance set out in pre-application prospectus as though the material change application was following a 'standard' tier of service.
- 3.1.3 The material change application process has a defined timescale set out in the relevant regulations and is not eligible for a fast-track procedure.

## 4. Expected submission timeframe

### 4.1 Application submission date

- 4.1.1 The anticipated material change application submission is **Q3 2026**. The submission date timeframe will be refined as the period of submission draws closer. NGET will provide PINS with regular updates regarding the submission date during the pre-application phase.



# 5. Timeframe of the pre-application process

## 5.1 Summary of pre-application timescales

- 5.1.1 An anticipated timeline of the pre-application process is set out in Table 1 below. The pre application timeframe will be refined, and further detail added as required following statutory consultation and as the period of submission draws closer.

**Table 1 – Anticipated application submission timeframe**

| Activity  | Expected timeframe                   |
|---|--------------------------------------|
| Environmental surveys   | Q3 2024 (ongoing)                    |
| Stakeholder engagement  | Q3 2024 - application submission     |
| PINS Inception meeting  | Q4 2024                              |
| Environmental Impact Assessment (EIA) Scoping Report Submission | Q2 2025 (May 2025)                   |
| Regulation 10 request submission                                | Q2 2025                              |
| Statutory consultation  | Q4 2025                              |
| Adequacy of consultation milestone                              | TBC – subject to agreement with PINS |
| Draft documents to PINS   | TBC – subject to agreement with PINS |
| DCO application submission                                      | Q3 2026                              |

## 6. Main issues for resolution

### 6.1 Introduction

- 6.1.1 The Applicant considers that the potential matters set out in the Table 2 below are likely to be the main issues for resolution. It is the Applicant's intention to resolve the issues prior to the submission of the Material Change Application as far as possible. The list of potential issues for resolution will be updated and refined to reflect input from stakeholders as the pre-application phase progresses.

**Table 2 – Main issues for resolution**

| Issue                        | Description of Issue  | Activities to resolve Issue  |
|------------------------------|---|--|
| Additional biodiversity loss | <p>The retention of permanent access infrastructure (e.g. culverts) may increase biodiversity loss and impacts on protected species compared to the original assessment.</p> <p>Protected species licences may require amendment.</p> | <p>Identification of any Further mitigation to minimise biodiversity loss as part of the EIA process</p>   |
| Land Access                  | <p>Managing current approved landowner access agreements whilst securing additional voluntary agreements to reduce the extent of additional compulsory acquisition of land rights.</p>  | <p>NGET is and will continue to engage with affected landowners to secure the necessary land rights to deliver the Project through the operational lifespan.</p> |
| Land Drainage Consents       | <p>Design of permanent culverts to be agreed with the relevant IDBs.</p>  | <p>Stakeholder engagement on the permanent design assurance and preparation of Statement of Common Ground.</p>   |
| Flood risk                   | <p>A large proportion of the Project is located within Flood Zones 1 – 3. The proposed changes to culverts may affect flood risk and drainage.</p>  | <p>Production of an updated Flood Risk Assessment (FRA).<br/>Engagement planned with the Environment Agency to agree assessment approach.</p>                    |

# 7. Stakeholder engagement

## 7.1 Local Planning Authorities

- 7.1.1 NGET has held ongoing engagement with the host LPAs throughout the delivery of the HPCCP. A regular monthly meeting called the Joint Officers Group (JOG) has been held between NGET and case officers representing each of host LPAs since 2018. NGET used these regular meetings as the forum to introduce the material change to the host LPAs in Q2 2024.
- 7.1.2 NGET has an existing Planning Performance Agreement (PPA) with the host LPAs to support the delivery phase of the Project and to ensure appropriate allocation or resources for matters related to the delivery of the 2016 DCO. NGET are in the process of developing a separate PPA to ensure that the host LPAs have the resources required to support the development of the Material Change Application.

## 7.2 Statutory Consultees

- 7.2.1 To date, introductory meetings have been held with the following statutory consultees:
- Internal Drainage Boards:
    - Somerset Drainage Consortium (Axe Bruce, Parrett & North Somerset Levels Internal Drainage Boards); and
    - Lower Severn Internal Drainage Board
  - Natural England
  - Environment Agency
  - Relevant Highway Authorities (North Somerset Council and Somerset Council).
- 7.2.2 Further meetings/briefings will be offered to all statutory consultees, including parish councils in areas directly affected by the material changes, and any non-statutory consultees where considered relevant.

## 8. Pre-application risks

### 8.1 Introduction

- 8.1.1 NGET currently considers the risks outlined in Table 3 to be the main risks to the key milestones programme. These risks are being monitored and managed through the pre-application process through an action tracker, and risk register; all of which are reviewed regularly by the multi-disciplinary team. NGET will also report on any risks to the programme during meetings with the host LPAs and PINS. This document will be updated should any changes occur to the key milestone programme.

**Table 3 – Risks to programme**

| <b>Risk</b>   | <b>Description of risk</b>  | <b>Tracking and managing risk</b>   |
|---|---|---|
| Obtaining access to land for surveys in a timely manner along the linear route of the Project.                                      | Timely land access is required to ensure appropriate environmental survey coverage.   | Early landowner engagement and coverage of multiple survey seasons.<br><br>Scope of surveys to be agreed with relevant statutory consultees with regard given to ongoing monitoring already in place along the Project.<br><br>Survey work programmed to continue throughout 2024 and 2025. |
| Host LPA resource constraints.  | LPAs may have limited resources to contribute to the pre-application process for the DCO material change, while also resourcing for the ongoing DCO delivery and other DCO projects being delivered by other promoters. | Regular discussions are held with the LPAs in the JOG meetings, and work is ongoing to agree the PPA.   |
| Changes to policy, guidance and or legislation introducing new or different requirements for the application.                       | Potential changes to legislation, policy or guidance in regard to applications for material change to the DCO.  | Continued monitoring of potential changes to legislation, policy and guidance ahead of the DCO material change application submission.  |
| Responses to statutory consultation or ongoing stakeholder engagement leading to changes to the design or approach to mitigation to | Time required to fully consider and assess suggested changes may result in programme delays.  | Design fixes programmed for at key milestones with sufficient time to accommodate feedback and prepare the relevant documentation.  |

| Risk                                    | Description of risk | Tracking and managing risk  |
|---|---------------------|---|
| accommodate the changes to the Project. |                     | Ongoing landowner and statutory engagement to agree design of the proposed changes. |

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