Vyrnwy Frankton

Programme Document

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GREEN GEN CYMRU

greengencymru.com

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1 Introduction

1.1.1 This Programme Document has been prepared for the Vyrnwy Frankton project (referred to as “the Project”) as a requirement under the Nationally Significant Infrastructure Projects: 2024 Pre-application prospectus.

1.2 Green GEN Cymru

1.2.1 The Applicant, Green Generation Energy Networks Cymru (GGC), is developing green energy networks to meet the future needs of the country’s people, communities and businesses.

1.2.2 In 2024, GGC were granted an Independent Distribution Network Operator (IDNO) licence by Ofgem. As an IDNO, GGC will design, construct and maintain a new 132kV electricity distribution network - needed to connect new renewable energy projects to the electricity transmission network, helping to get green energy to homes and businesses.

1.3 Project Timeline

1.3.1 The following diagram provides an indicative timeline for the Project from the initial non-statutory consultation held in 2023 to it becoming operational in 2029.

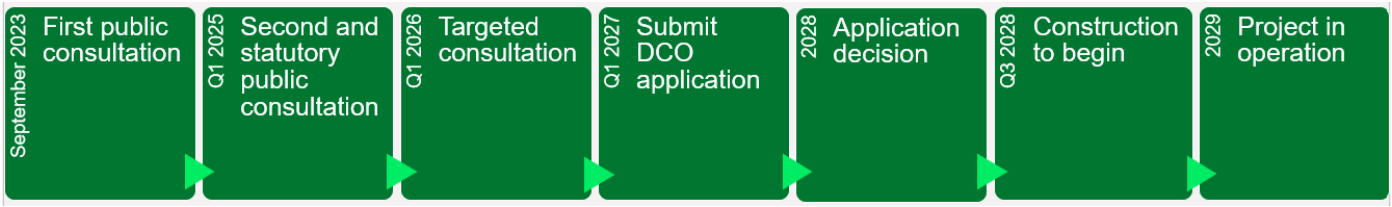

Figure 1 – Indicative Timeline

1.4 Purpose and Structure

1.4.1 In accordance with the Planning Inspectorate’s (PINS) 2024 Pre-application Prospectus, this document sets out the timetable and describes the activities necessary for an effective pre-application process. To support the pre-application process GGC has agreed with PINS that the Project will receive the Enhanced (Tier 3) pre-application service.

1.4.2 This document reflects the current position of the Project and will be updated as necessary with any changes communicated to PINS and stakeholders by the Applicant during the pre-application period.

1.4.3 This Programme Document is structured as follows:

- Section 2: Project Description
- Section 3: Level of Pre-application Service
- Section 4: Programme of Pre-application Activities
- Section 5: Technical Stakeholder Engagement
- Section 6: Main Issues for Resolution
- Section 7: Pre-application risks and how these are tracked and managed.

2 Project Description

2.1.1 The Applicant is proposing a new 132 kV connection to connect energy parks in Mid Wales to the national electricity network.

2.1.2 The Project includes the proposed new Cors y Garreg Collector Substation in Powys, approximately 2.5km of underground cable, approximately 50km of new overhead line and a switching station to connect to the national electricity network near to Lower Frankton, Shropshire. This new connection is needed to add capacity to the local network, providing the necessary infrastructure to connect renewable energy to homes and businesses. It could also help support the widespread rollout of electric heating and vehicles, helping to address the climate emergency.

2.1.3 The proposed new collector substation has moved from the previously proposed site (which was part of the Project's 2025 Statutory Consultation) at Grug Y Mynydd for several reasons. The change in location presents an improvement in terms of construction risk, construction programme, long-term maintenance and operation, and cost. Primarily, the reduction in underground cable length provides a positive impact on the system robustness, and the relocation removes the need for the Sealing End Compound. Figure 2 below shows the current Project's draft Order Limits, as proposed in the 2026 Targeted Statutory Consultation.

2.1.4 As well as the permanent infrastructure, land would also be required temporarily for construction activities including, for example, working areas for construction equipment and machinery, site offices, welfare, storage and temporary construction access. Third party utilities diversions and/or modifications would also be required to facilitate the construction of the Project.

2.1.5 The Project will comprise of the following:

- A new 132 kV Corys y Garreg Collector Substation near Cefn Coch, Powys, together with approximately 2.5km of Underground Cable (UGC) from the Llyn Lort Energy Park Substation to the Cors y Garreg Collector Substation;
- Approximately 50km double circuit 132kV Overhead Line (OHL), supported on steel lattice towers from the new 132kV Cors y Garreg Collector Substation to a new switching station near Lower Frankton, Shropshire;
- The new OHL will be supported on a type of tower referred to as an L7 design, a steel lattice tower with six cross-arms (three on each side);
- A new switching station near Lower Frankton which will connect the OHL to the existing 400kV national electricity transmission system in Shropshire, England;

- There will be temporary works associated with the construction of the Project including working areas for construction equipment and machinery, site offices, welfare, storage and construction access; and
- Works to deliver environmental mitigation, compensation and enhancement.

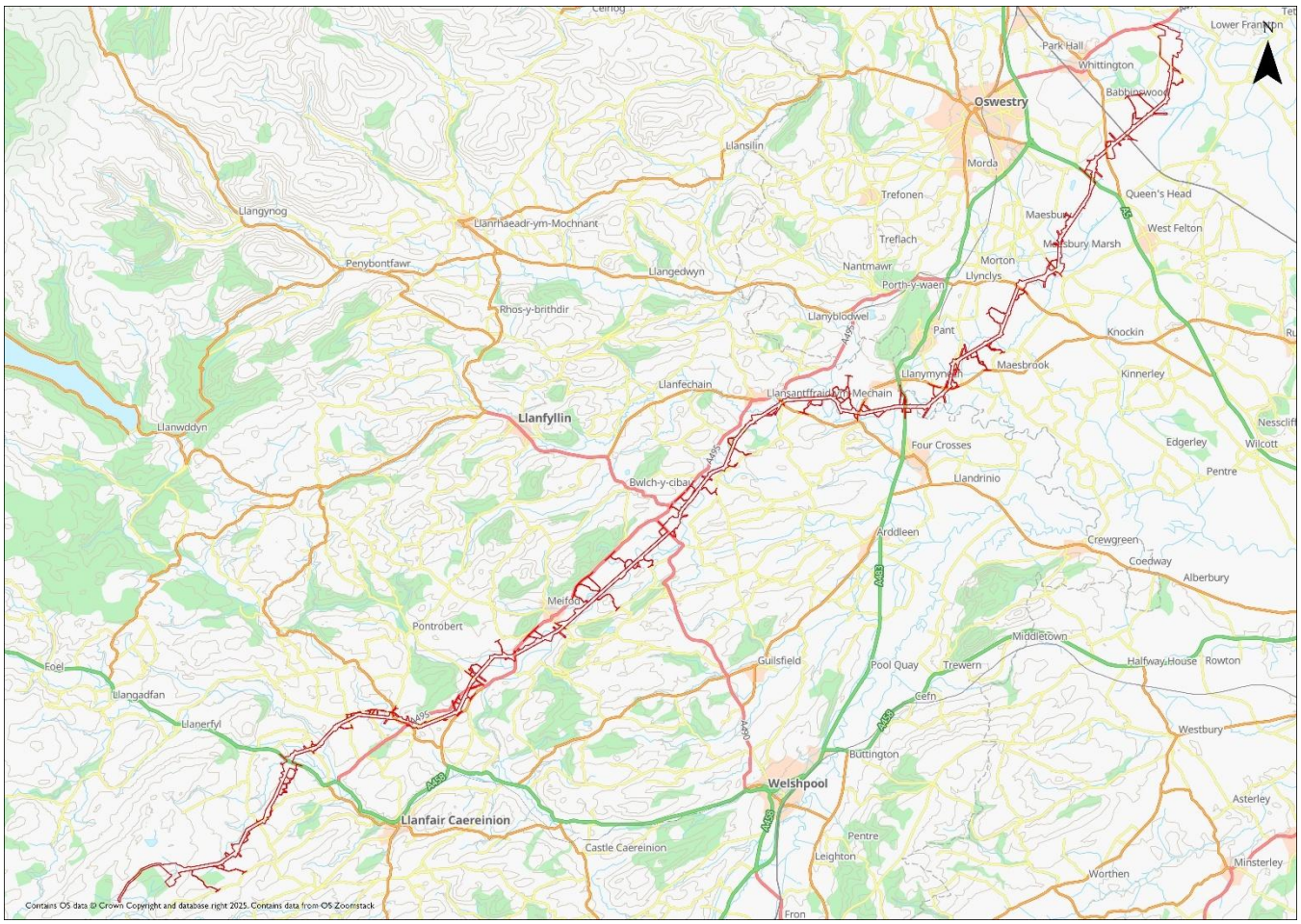

Figure 2 – Project's draft Order Limits

2.1.6 The Project is located within the jurisdiction of Powys County Council (PCC) and Shropshire Council (SC) and crosses the border between Wales and England.

2.1.7 The Project falls within the definition of a 'Nationally Significant Infrastructure Project' (NSIP) under Section 14(1)(b) of the Planning Act 2008 as the Project comprises "*the installation of an electric line above ground*". Section 16(1)(c) of the Act clarifies that "*The installation of an electric line above ground is within section 14(1)(b) only if (when installed) the electric line will be – partly in England and partly in Wales*." All NSIPs in England and Wales require a Development Consent Order (DCO). Sections 16(3) and 16(3B) provide criteria which (if satisfied) exclude overhead lines from the scope of section 14(1)(b), none of which apply to the Project.

3 Level of Pre-application Service

3.1.1 The Applicant agreed the Tier 3 Enhanced pre-application service with PINS for the Project in August 2024.

3.1.2 The Project is linear and complex, and it is considered that the Tier 3 Enhanced Service is appropriate for the following reasons:

- The Project falls within both Wales and England. As the Project is an NSIP, the decision will be made by the Secretary of State. However, engagement with the Welsh Government on the Project is required as it is a cross-border project. There are therefore additional complexities in this regard;
- Although the relevant National Policy Statements have primacy for NSIPs, the broader planning policy framework sometimes differs between England and Wales, for example with respect to new connections on overhead lines and the approach to Net Benefit for Biodiversity / Biodiversity Net Gain;
- As this is a cross-border project, there are a higher number of statutory environmental bodies for the Applicant to engage with (in most cases the list of bodies is duplicated across Wales and England). There are also differences, for example, in levels of required data, approaches to impact assessments and, for example, the approach to calculating Net Benefit for Biodiversity / Biodiversity Net Gain. This adds significant complexity to both the Project's interaction with each of those statutory bodies, but also around how that is communicated effectively to other interested parties who may engage with different elements of the Project in both England and Wales;
- The Project includes several interconnected elements (a Collector Substation (in Powys)), underground cable (in Powys), overhead line (through Powys into Shropshire), and a Switching Station (in Shropshire). It is inherently therefore a complex infrastructure project affecting a wide range of interested parties across a number of different landscape areas and environmental receptors;
- The Project is likely to involve the compulsory acquisition of land, rights over land, and temporary possession of land which will impact affected parties;
- The Project follows a similar route to a previous 400kV connection project promoted by National Grid around 10 years ago. At the time there was significant local interest in that scheme and indications are that this level of local interest has continued.

3.1.3 The Applicant would welcome support under the following 'components' identified in the Guidance:

- Component 2: Use of pre-application Principal Areas of Disagreement Summary Statements
- Component 3: Production of Policy Compliance Document
- Component 4: Design Approach Document
- Component 5: Mature Outline Control Documents
- Component 6: Use of multiparty meetings
- Component 7: Preparation of Compulsory Acquisition and Temporary Possession evidence

3.1.4 Please refer to Tables 1 and 4 below for details on the timelines. These will be reviewed with PINS as the Project progresses.

4 Programme of Pre-application Activities

4.1.1 *Table 1* below sets out a summary of the key Project activities undertaken to-date and those planned between now and submission of the DCO application.

4.2 Key Activities undertaken to-date

4.2.1 The Stage One non-statutory consultation took place between September and October 2023. It sought feedback on a preferred draft corridor and siting area for the Collector Substation and Cable Sealing End Compound. At the time a 'search area' for a new National Grid substation was shown.

4.2.2 Following the consultation, all feedback was analysed and the Applicant published a Phase One Consultation Feedback Summary (Winter 2023/24) on the Project website[1].

4.2.3 The EIA Scoping Report was submitted to PINS in January 2024, and the Scoping Opinion was received in March 2024. The Scoping Report included a Scoping Corridor which was based on the consultation corridor for the 2023 non-statutory consultation.

4.2.4 Informal consultation on the draft Statement of Community Consultation (SoCC) with PCC and SC (as host local authorities), took place in October and November 2024. Formal consultation on the SoCC was undertaken between the 12 November 2024 and 11 December 2024 in accordance with Section 47 of the Planning Act 2008 (the Planning Act). The SoCC has been made available on the Project website along with the Section 47 Notice.

4.2.5 An eight-week statutory consultation ran from 19 February 2025 until 16 April 2025 in accordance with sections, 42, 43 and 44 of the Planning Act. The community consultation (in accordance with section 47 of the Planning Act) was delivered as per the plans set out in the SoCC.

4.2.6 Following the statutory consultation all feedback was analysed, and the Applicant published a Statutory Consultation Feedback Summary (Autumn 2025) on the Project website.

[1] Home - Green GEN Cymru consultation

4.3 Planned Key Activities

4.3.1 The Applicant carried out a further targeted consultation along the proposed route. The Targeted Statutory Consultation was held from Wednesday 4 February until Friday 27 March 2026. This was delivered in line with government guidance on targeted consultation and in accordance with the requirements of the Planning Act. This further consultation was required to inform stakeholders and communities of key proposed design changes focused on seven Areas of Change along the route.

4.3.2 Prior to the Targeted Statutory Consultation, the Applicant engaged with PCC and SC on our Targeted Community Statutory Consultation Strategy, which described how we proposed to undertake consultation with communities. This engagement took place between October and December 2025. The Targeted Statutory Consultation used a variety of methods to explain our proposals and encouraged people to provide their comments on the Areas of Change.

4.3.3 Dates and how to take part in the Targeted Statutory Consultation were also published on the project website, together with a series of documents that describe the Areas of Change.

4.3.4 The Applicant notified prescribed consultees and stakeholders of the Targeted Statutory Consultation as required by Sections 42, 43 and 44 of the Planning Act.

4.3.5 The consultation with communities (as required by Section 47 of the Planning Act) was carried out as described in the Community Consultation Strategy. This included:

- Notification letters to addresses within the 1 km consultation zones around each of the Area of Change
- Leaflets describing the Areas of Change
- Updates to the Project website
- Publicity including local advertising, posters, and an e-bulletin to web subscribers

4.4 Preparation of DCO Application

4.4.1 Engagement with PINS (and other stakeholders as necessary) on key DCO documents commenced in Q1 2026 with the submission of a draft Policy Compliance Document for review, following the publication of revisions to National Policy Statements EN-1 and EN-5 in December 2025. This programme of engagement will continue until September 2026, as the submission of the DCO application is planned for February 2027.

4.4.2 Three progress meetings with PINS are planned for 2026, prior to submission of the DCO application in February 2027, on a range of matters related to the stage of the Project reached at the time, as outlined in Table 4.

4.4.3 PINS review of the 'Adequacy of Consultation Milestone' will be sought in July 2026. It is considered that this is sufficiently towards the end of the pre-application stage to assess the adequacy of consultation but early enough to allow additional engagement if required.

4.4.4 As a final stage in the process, a period of 8 weeks has been allowed between October and November 2026 for PINS to review the following draft DCO documents:

- Draft DCO - including protective provisions
- Draft DCO Explanatory Memorandum
- Sample Works Plans and Land Plans
- Consultation Report - including section 42 consultee list
- HRA report
- Environmental Statement project description chapter
- Planning Statement
- Book of Reference
- Statement of Reasons
- Funding Statement
- Outline Construction Environmental Management Plan
- Drafting associated with key issues and/ or novel approaches within the Environmental Statement
- Policy Compliance Document
- Design Approach Document

4.4.5 A detailed programme for the submission and review of these documents is being developed in due course and will be agreed with PINS at least three months prior to the start of the review. It is intended to submit the draft documents at different

intervals during this period, allowing sufficient time to receive feedback and address the advice given by PINS following the draft document review.

4.4.6 A summary of the dates for key activities is provided in *Table 1* below.

Table 1 – Key Project Milestone Dates

Activity	Planned Timeframe
Non-statutory consultation	September – October 2023 (Complete)
EIA scoping	January 2024 (Complete)
Scoping Opinion	March 2024 (Complete)
Inception Meeting	November 2024 (Complete)
Consultation with PCC and SC on Statement of Community Consultation	October 2024 – January 2025 (Complete)
Statutory Consultation	February - April 2025 (Complete)
Targeted Statutory Consultation	February - March 2026 (Complete)
Submit draft Issues Tracker for PINS comments	February 2026 (Complete)
PINS/PCC/SC engagement on draft Policy Compliance Document	March 2026 (Ongoing)
Submit draft Land and Rights Negotiations Tracker for PINS comments	Autumn 2026
Schedule of draft DCO documents to be reviewed and detailed timings to be sent to PINS	July 2026
Submit draft Design Approach Document for initial PINS comments	September 2026
Adequacy of Consultation Milestone	September 2026
PINS Final Review of Trackers (e.g. Land & Rights, Issues, PCD, etc)	October 2026
Potential Main Issues for the Examination (PMIE)	October 2026

Activity	Planned Timeframe
Sharing of Draft DCO documents with PINS for review	October - November 2026
Sharing of Draft Protective Provisions with affected parties	November 2026 – January 2027
DCO submission	February 2027

4.4.7 The Applicant will provide PINS and stakeholders with regular updates regarding programme and the target submission date as the project progresses.

5 Technical Stakeholder Engagement

5.1.1 *Table 2* provides a summary of the engagement undertaken to-date with PINS and that proposed between now and submission of the DCO application (to be agreed with PINS).

5.1.2 An outline of other key engagement activities is presented below.

5.2 Local Authorities and Statutory Environmental Bodies

5.2.1 A Planning Performance Agreement (PPA) has been signed with PCC. High level project management meetings have taken place, highlighting the requirements for technical engagement up to submission of the DCO.

5.2.2 A PPA has been shared and discussed with SC, however it has not been agreed and signed at the time of writing.

5.2.3 Attempts to engage have continued, following receipt of the Scoping Opinion, with statutory environmental bodies, including:

- Natural Resources Wales
- Natural England
- Heneb
- Cadw
- Historic England
- Environment Agency

5.2.4 These discussions also cover service level agreements and arrangements under discretionary advice services of relevance to the particular organisation. As part of the Tier 3 Enhanced Service, it is envisaged that PINS would assist with facilitating cross border meetings with 'host' local authorities and key stakeholders as required. Currently, it is contemplated these will be needed on ecological, cultural heritage and planning matters (see Table 2 below).

5.2.5 This would enable issues to be discussed and would feed into pre-application 'Principal Areas of Disagreement Summary Statements'. The need for these meetings and the role that PINS would play in facilitating them will be agreed, both with PINS and stakeholders and appropriate notice will be provided to attendees.

The current intention is for multi-party meetings to be held in July - August 2026 (see *Table 4*).

5.2.6 *Table 3* below includes the current programme of surveys, per topic. Based on these time-frames, the planned engagement with technical consultees is also outlined. *Table 4* contains the forward look for engagement by month.

5.3 Other Stakeholder Engagement

5.3.1 Alongside engagement with the 'host' local authorities regarding planning and EIA matters, briefings have been held with relevant MPs, Senedd Members, local councillors and other stakeholders including, Parish and Community Councils, as requested. These were held in the run up to the targeted statutory consultation period, with further engagement likely to take place as required.

5.3.2 In order to provide a robust engagement offering for the DCO, further engagement with the following stakeholders who have a particular interest in the project is currently underway or planned during the course of the pre-submission stage of the project:

- BT Openreach
- Canal and Rivers Trust
- Forestry Commission
- Internal Drainage Board (Melverley)
- Llyn Lort Energy Park
- Ministry of Defence
- National Grid Electricity Transmission
- National Highways
- Network Rail
- North and Mid Wales Trunk Road Agent
- Rhiwlas Energy Park
- Scottish Power Energy Networks
- Severn Trent Water
- Scottish Power Manweb
- Tirgwynt Wind Farms
- Vattenfall Wind Power Ltd
- Wales & West Utilities
- Welsh Government LQAS

Table 2 – Engagement with PINS to Date

Engagement Undertaken (Date)	Matters Discussed	Meeting Participants
4 November 2024	Inception Meeting: • Project Update • Update from PINS on new guidance • Working Arrangements for the Enhanced Tier Service • Programme Document	PINS (NIE/EA)
10 June 2025	Progress Meeting 1: • Project Update • Consultation Update • Multi-Party Meetings & Cross-Border Alignment • Key Documents • Policy Compliance Document • Design Approach Document • Submission of Documents – PINS Review • Land Update	PINS (NIE/EA)
8 September 2025	Progress Meeting 2: • Project Update	PINS (NIE/EA)

Engagement Undertaken (Date)	Matters Discussed	Meeting Participants
	○ Post Statutory ○ Consultation change control ○ New Senior Project Manager ○ National Grid (NGET) Proposals Update ○ Customer (Llyn Lort Energy Park) Statutory Consultation • Consultation Update ○ Targeted consultation approach ○ AoCM review • Stakeholder Engagement ○ NRW National Park Proposal ○ Environmental survey basis ○ Topic specific meetings schedule • Land Update	
January 2026	Progress Meeting 3 • Project Update ○ Programme Document: ○ Policy Compliance Document • Consultation Update	PINS (NIE/EA)

Engagement Undertaken (Date)	Matters Discussed	Meeting Participants
	○ Targeted Consultation ○ NRW Proposed National Park • Stakeholder Engagement • Land Update • Future PINS Meetings	
April 2026	Progress Meeting 4 • Introductions • Project Update • Consultation Update • Technical Stakeholder Engagement • Land Update • Feedback on submitted documents • Future PINs Meetings	PINS (NIE/EA)
July 2026	Progress Meeting 5 • Introductions • Project Update • Technical Stakeholder Engagement • Land Update • Feedback on submitted documents • Future PINs Meetings	PINS (NIE/EA)

Engagement Undertaken (Date)	Matters Discussed	Meeting Participants
October 2026 (TBC)	Progress Meeting 6 • Agenda TBC	PINS (NIE/EA)
January 2027 (TBC if required)	Progress Meeting 7 • Agenda TBC	PINS (NIE/EA)

Table 3 – Indicative Time Frames for Future Surveys and Technical Stakeholder Engagement

Topic	Related Surveys	Surveys Timeline – Target Dates	Stakeholder Engagement – Parties	Stakeholder Engagement – Target Dates
Landscape and Visual Amenity	VP-Winter photography	Completed - carried out in February 2026.	Local Planning Authorities (LPAs)	July - August 2026
	Site-specific landscape character assessment	Completed - carried out in April 2026.		
	Residential Visual Amenity Assessment	Ongoing - planned to complete in July 2026		
	VP-Summer photography	Ongoing - planned to complete in July 2026		
Ecology	Otters	Ongoing - July 2026 onward	LPAs Natural Resources Wales (NRW) Natural England (NE) EA	NE and NRW combined meeting – July - August 2026 LPAs – ASAP July - August 2026 EA – July 2026
	Dormouse	Ongoing - February – November 2026		
	GCN	Ongoing - April – June 2026*		

Topic	Related Surveys	Surveys Timeline – Target Dates	Stakeholder Engagement – Parties	Stakeholder Engagement – Target Dates
		* *Will be complete by end of June based on available access.*		
	Bats	Completed - May - June 2026		
	Habitats	Ongoing - July 2026		
	River Condition Assessment	Ongoing - July 2026 onward		
Ornithology	Breeding Bird Surveys	Ongoing - April – June 2026	NE NRW LPAs	NE and NRW combined meeting (with Ecology) – July - August 2026 LPAs – ASAP –July - August 2026
	Raptor Surveys	Ongoing - March - June 2026		
Historic Environment	Geophysical Survey	Ongoing - May – August 2026	Historic England Cadw	July 2026

Topic	Related Surveys	Surveys Timeline – Target Dates	Stakeholder Engagement – Parties	Stakeholder Engagement – Target Dates
	Geoarchaeology	Geoarchaeology DBA June – July 2026	Heneb LPAs	
	Trial Trenching	July- August 2026		
	Borehole Monitoring	June-July 2026		
	Walkover (additional)	Ongoing - Walkover (additional) - June 2026		
Traffic and Transport	Automatic Traffic Count (ATC)	June - July 2026	LHA	July - August 2026
	Site/Routes Drive Through	June - July 2026		
Noise and Vibration	Background noise surveys in vicinity of Switching Station and Collector Substation	Completed - March/April 2026 (7-day surveys at 7 locations*)	LPAs – EHO at Powys County Council and Shropshire Council	ASAP TBC

Topic	Related Surveys	Surveys Timeline – Target Dates	Stakeholder Engagement – Parties	Stakeholder Engagement – Target Dates
		* *One location to be re-surveyed due to partial data collection only.*		
Water Resources	Geomorphology	Completed* - February – March 2026 **Partial route coverage only due to lack of access*	LPAs EA NRW NE LLFA IBB	Geomorphology NRW/EA –July - August 2026 WFD NRW/EA –July - August 2026 Flood risk NRW/EA/LLFA/IDB –July - August 2026
Ground Conditions, Geology and Hydrogeology	Site visits (depending on LPA responses to data requests)	Completed* - March 2026 **Further survey may be required following receipt of updated Private Water Supply data*.	EA NRW NE Lead Local Flood Authorities Melverley IDB	TBC after LPA responses have been received

Topic	Related Surveys	Surveys Timeline – Target Dates	Stakeholder Engagement – Parties	Stakeholder Engagement – Target Dates
Air Quality	Not anticipated at this stage	N/A	LPAs – EHO at Powys County Council and Shropshire Council NRW NE	July - August 2026 – following LHA data being received
Soils and Agriculture	Soil/Agricultural Land Classification Surveys	Completed* - March – May 2026 **Partial route coverage only due to lack of access.*	LPAs NRW LQAS NE	Consultation with NRW, NE and LQAS in June - July 2026 LPAs –July - August 2026
Arboriculture	Arboricultural Survey	Completed* - February – May 2026 **Partial route coverage only due to lack of access.*	LPAs	July - August 2026
Health and Wellbeing	N/A	N/A	LPAs	July - August 2026

Topic	Related Surveys	Surveys Timeline – Target Dates	Stakeholder Engagement – Parties	Stakeholder Engagement – Target Dates
Greenhouse Gases	N/A	N/A	LPAs	July - August 2026

Table 4 – Planned Future Engagement with PINS and Multi-Party Meetings - Timeline

Planned Engagement (Date)	Matters to be Discussed	Meeting Participants
July 2026	Multi-party Meeting 1: • Ecological assessment methodologies • Approach to Biodiversity Net Gain/ Net Biodiversity Benefit • Ecology (Otters, Dormouse, GCN, Bats, Habitats) and Ornithology (Breeding Bird and Raptor Surveys) • Air Quality • Arboriculture	PINS (NIE/EA), Environment Agency, Natural Resources Wales, Natural England
ASAP - July 2026	Powys County Council • Local Impact Report (LIR)	Powys County Council

Planned Engagement (Date)	Matters to be Discussed	Meeting Participants
	• Statements of Common Ground (SoCG) • DCO Requirements • Landscape and Visual Amenity • Historic Environment • Air Quality • Arboriculture • Ecology • Ornithology • Ground Water/Ground Conditions • Noise and Vibration • Socio Economics, Recreation and Tourism • Cumulative Effects	
ASAP (subject to PPA approval)	Shropshire Council • Local Impact Report (LIR) • Statements of Common Ground (SoCG) • DCO Requirements • Landscape and Visual Amenity • Historic Environment • Air Quality • Arboriculture	Shropshire Council

Planned Engagement (Date)	Matters to be Discussed	Meeting Participants
	• Ecology • Ornithology • Ground Water/Ground Conditions • Noise and Vibration • Socio Economics, Recreation and Tourism • Cumulative Effects	
July – August 2026	Traffic & Transport - Automatic Traffic Count (ATC) surveys	LHAs
July - August 2026	Air Quality Arboriculture	LPAs – EHO at Powys County Council and Shropshire Council (jointly or individually, PPA dependent)
July - August 2026	Multi-party Meeting 2 (Water and Ecology) • Water - Geomorphology • Ecology - River Condition Assessment	NRW and EA
July - August 2026 (TBC if required)	Multi-party Meeting 3 (Archaeology): • Agreement on further investigation • Agreement on mitigation (Archaeological Management Plan)	PINS (NIE/EA), Cadw, Historic England, Heneb
July 2026	Multi-party Meeting 4 (Water)	NRW and EA

Planned Engagement (Date)	Matters to be Discussed	Meeting Participants
	• WFD	
July - August 2026	Multi-party Meeting 5 • Flood Risk	NRW/EA/LLFA/IDB
July - August 2026	Greenhouse Gases Health and Wellbeing	LPAs – jointly or individually, PPA dependent

6 Main Issues for Resolution

6.1.1 The main issues for resolution are identified in *Table 5* below:

Table 5 – Main Issues for Resolution

Potential Main Issue		Green Gen Cymru's Proposed Resolution
Landscape and Visual Amenity	Potential effects on landscape and visual amenity of local receptors.	Potential landscape and visual effects will be assessed as part of the ES and have been mitigated as far as practicable through the routeing, siting and design of the proposed route. The Applicant will use relevant guidance such as the Holford Rules to inform the siting and design process to minimise potential landscape and visual effects. In addition, the assessment will inform modifications and refinements to the detailed design of the Project including consideration of individual pylon locations and alternative technology. Where practicable, enhancement measures will be developed to offset the landscape and visual effects. If meaningful engagement does not take place with the stakeholders, the risk leading into examination remains high.
Ecology	Potential effects on ecology including local designated sites and habitats.	Potential effects on ecology will be assessed as part of the ES and embedded measures, such as avoiding or minimising adverse impacts, will form part of the iterative design process. The HRA will consider potential for likely significant impacts to European sites. In addition, the Project will deliver a minimum of 10% Biodiversity Net Gain. Whilst the approach to measuring biodiversity units will follow the statutory Defra metric guidance for NSIPs, the approach to providing net gain and minimising impacts through routing of the

Potential Main Issue		Green Gen Cymru's Proposed Resolution
		Project aligns with the approach for Planning Policy Wales Net Benefit for Biodiversity. Consultation with the LPAs as statutory consultees for NBB/BNG is being sought in Q3 2026, following review of the Project's proposed approach and anticipated engagement with NRW and NE. If agreement is not reached through consultation with parties, a methodology for the approach that has not be approved by stakeholders will need to be taken forward into the application. It is considered that the risk of not resolving this matter prior to submission is medium because the initial multi-party meeting has not taken place which will indicate the level of concern from stakeholders.
Biodiversity Net Gain	The approach to Biodiversity Net Gain (BNG) and Net Benefit for Biodiversity (NBB) is now a priority area for discussion. With Defra having issued guidance on BNG requirements for NSIPs, it is important to agree how the Project will address and integrate both BNG and NBB within its overall strategy	Consultation with the LPAs as statutory consultees for NBB/BNG is being sought in Q3 2026 following review of the Project's proposed approach and anticipated engagement with NRW and NE. If agreement is not reached through consultation with parties, a methodology for the approach that has not be approved by stakeholders will need to be taken forward into the application. It is considered that the risk of not resolving this matter prior to submission is medium because the initial multi-party meeting which will indicate the level of concern from stakeholders has not yet taken place.

Potential Main Issue		Green Gen Cymru's Proposed Resolution
Historic Environment	Potential effects on nearby heritage features and onsite archaeology.	Potential effects on nearby heritage features (including impacts to the setting of heritage assets) and onsite archaeology will be assessed as part of the ES. The Applicant will seek to avoid and minimise effects, as much as practically possible, through design and additional mitigation. These will be secured through the DCO if necessary (e.g. an Outline Construction Environmental Management Plan (OCEMP)). Every effort is being made to resolve any issues prior to examination, through detailed engagement with the parties. This includes planned discussions around the approach to surveys as well as the options for mitigation. It is currently considered that the risk of not resolving this matter is medium.
Ground Conditions	Trederwen Spring Company	Trederwen Spring Co is a water bottling company that uses groundwater for its spring water source. Their responses to statutory consultation identified their concerns with the Project in respect of water quality. Therefore, consultation with Natural Resources Wales (NRW) is being arranged (subject to a signed DAS) to agree on specific mitigation measures. The consultation will include discussion about the need for a source protection zone (SPZ) so that potential impacts can be assessed. The likelihood of not resolving this matter prior to submission is considered to be medium as engagement is ongoing with NRW.

Potential Main Issue		Green Gen Cymru's Proposed Resolution
Ground Conditions	Ramsar site (Morton Pool SSSI)	Additional virtual consultation is being arranged with the Environment Agency (EA) and Natural England (NE) regarding the Morton Pool SSSI, involving possible mitigation. It is considered that the risk of not resolving this matter prior to submission is medium as engagement with the EA and NE is ongoing.
Ground Conditions	Shropshire Groundwater Scheme	In the EIA Scoping Opinion, the EA stated that information should be sought regarding the Shropshire Groundwater Scheme, which is a multi-well scheme used to supplement the River Severn, of which some of the scheme is near the northern section of the Project. Engagement with the relevant parties is being sought.
Ground Conditions	Lower Frankton Switching Station	In the Frankton Switching Station area and surroundings, there is a public water supply source (well) and associated published source protection zones. Additional consultation with the EA is being sought on this topic.
Ground Conditions	Geological Conservation Review area	One of the proposed towers is located within a designated GCR area. Consultation is being sought with NRW regarding potential mitigation measures required to reduce the impact / effect on this receptor.
Flood risk	Potential effects on flood risk on the site and surrounding area.	Potential effects on flood risk during construction and operation will be assessed as part of the ES, taking into consideration the active nature of the River Vyrnwy. Where possible, infrastructure will be positioned to avoid or minimise flood risk impacts. A Flood Risk

Potential Main Issue		Green Gen Cymru's Proposed Resolution
		Assessment will also be carried out to assess risks to the Project from flooding sources, and this will contain appropriate mitigation measures. The construction of the Project will also be managed through a CEMP.
Compulsory acquisition	The DCO for the Project will include powers for the compulsory acquisition of land and rights.	The Applicant will seek to secure the necessary interests over the land required for the Project by agreement. However, in the event that agreement cannot be reached for a particular site, powers for the compulsory acquisition of land and rights will be included in the DCO for the Project. A Statement of Reasons and other documents will be submitted with the application to demonstrate that the public benefit of the Project will outweigh the infringement of private rights which would occur should powers of compulsory acquisition be granted and exercised.
Grid connection	The Project will connect to the wider national electricity system at a substation being developed by National Grid Electricity Transmission which has not yet been consented.	A new substation is being developed by National Grid Electricity Transmission (NGET), in the Lower Frankton area, which the Project will connect into. NGET's proposal will also include the connection between Green GEN Cymru's proposed Lower Frankton switching station to the NGET Substation. These two elements do not form part of the Project. A planning application with the proposed details of the NGET Substation has been submitted. The Applicant is in regular engagement with NGET in relation to their proposal. A targeted landscape and ecology meeting is being planned for June/July 2026 to discuss

Potential Main Issue		Green Gen Cymru's Proposed Resolution
		general planting and landscape plans, and landscape and visual-related mitigation. The NGET substation will also be included in the cumulative assessment for the Project's ES.

7 Pre-Application Risks and How these are Tracked and Managed

7.1.1 A summary of the pre-application programme risks at the current stage of the Project's development and how these are tracked and managed is provided in *Table 6* below:

Table 6 – Pre-Application Risks

Risk	Description of Risk	Tracking and managing risk
Lack of sufficient resource/capacity within 'host' Local Planning Authorities (LPAs) to engage with proposals in a detailed and timely manner	Limited resource and capacity of LPAs results in limited engagement on the proposals and inability for the LPAs to provide timely and constructive feedback throughout the pre- application stage of the project, including statutory consultations.	Engagement with both LPAs has been ongoing and Green GEN Cymru are seeking to agree PPAs with PCC and SC. Regular updates will be provided regarding project progress and programme. Joint meetings / topic groups meetings will be arranged with both LPAs to discuss cross-border issues and consistent approach to assessments.
Lack of sufficient resource/capacity within stakeholder organisations to engage with proposals in a detailed and timely	Limited resource and capacity of some statutory consultees could result in limited engagement on the proposals and inability for statutory consultees to provide timely and constructive feedback throughout the pre-application stage of the project, including statutory consultations.	Stakeholder engagement is continuing, with Green GEN Cymru seeking to set up arrangements under the discretionary advice services for the respective organisations. Regular updates regarding project progress and programme will be provided. Joint topic groups meetings will be arranged with both Welsh and English stakeholders to discuss cross border issues and a consistent approach to assessments.

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