

Green Gen Vyrnwy Frankton Programme Document

March 2025

1. Introduction

- 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.

Green GEN Cymru

- 1.2. Green Generation Energy Networks Cymru (Green GEN Cymru) is developing green energy networks to meet the future needs of the country’s people, communities and businesses.
- 1.3. In 2024 we were granted an Independent Distribution Network Operator (IDNO) licence by Ofgem. As an IDNO, we’ll 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.

Project Timeline

- 1.4. 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



Purpose and Structure

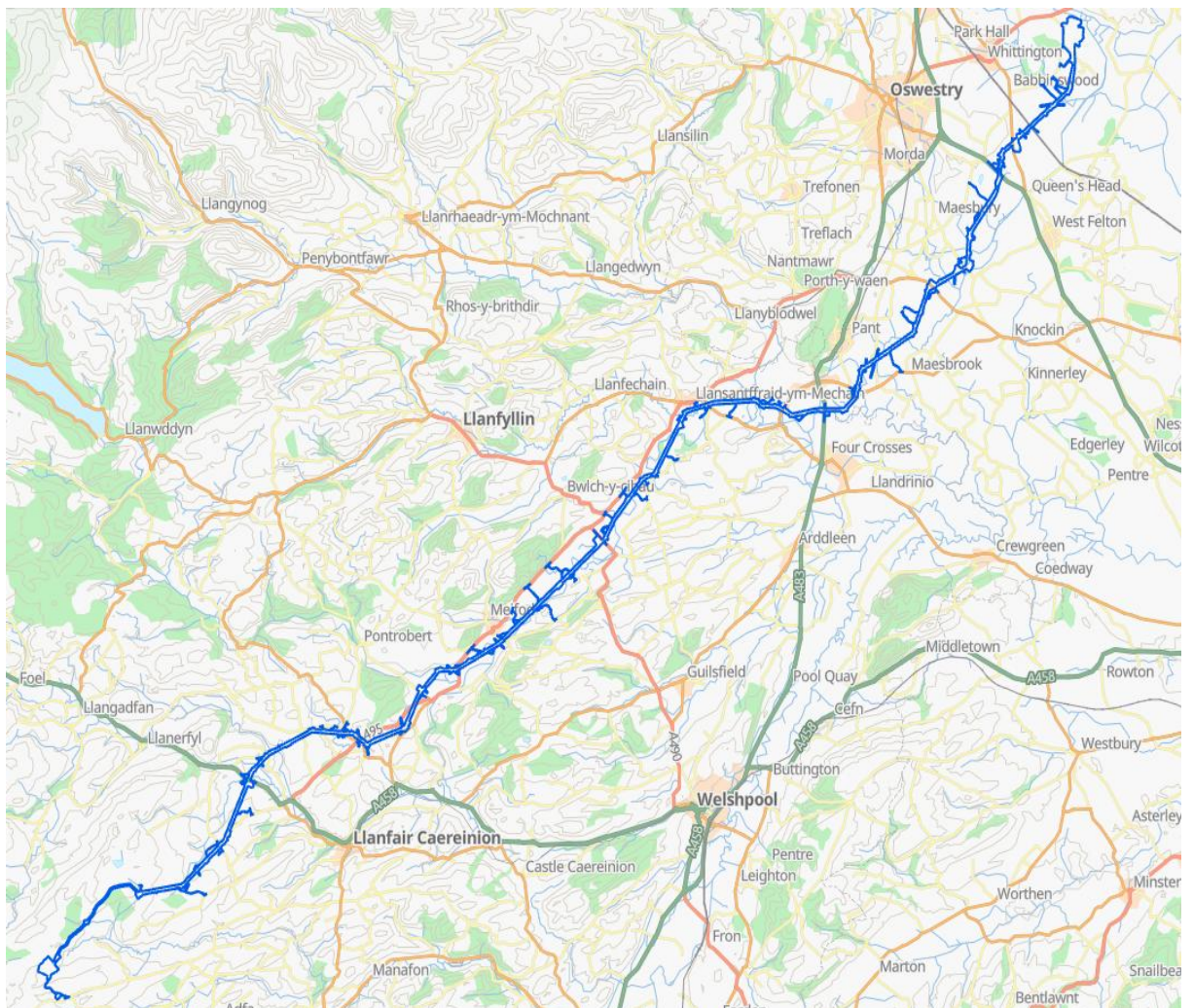
- 1.5. In accordance with the Planning Inspectorate’s (PINS) 2024 Pre-application Prospectus, this document sets out the timetable and describes the activities necessary for an effective pre-application process. To support the pre-application process Green GEN Cymru has agreed with the PINS that the Project will receive the Enhanced (Tier 3) pre-application service.
- 1.6. This document reflects the current position of the Project and will be updated as necessary with any changes communicated to PINS and stakeholders by Green GEN Cymru during the pre-application period.
- 1.7. 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: Engagement
- Section 6: Main Issues for Resolution
- Section 7: Pre-application risks and how these are tracked and managed.

2. Project Description

- 2.1. Green GEN Cymru are proposing a new 132 kV connection to connect energy parks in Mid Wales to the national electricity network.
- 2.2. The Project includes Grug y Mynydd collector substation near Cefn Coch in Powys, approximately 4.8km of underground cable and a sealing end compound, approximately 45km 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. *Figure 2* below shows the current Project's draft Order Limits.

Figure 2 Project's draft Order Limits



2.3. The Project will comprise of the following:

- A new 132 kV collector substation near Cefn Coch, Powys, known as the Grug y Mynydd substation;
- Approximately 4.8km of underground cable from Grug y Mynydd substation through the proposed Llyn Lort Energy Park to a cable sealing end compound at Cors y Carreg;
- The Cors y Carreg cable sealing end compound would enable the transition between underground cables and overhead conductors;
- Approximately 45km of new overhead line supported on L7(c) steel lattice pylons (average height of 28.5m) from Cors y Carreg sealing end compound to a new switching station;
- A switching station near Lower Frankton, Shropshire which allows the power to be isolated from a proposed new substation being developed by National Grid to connect to the existing 400kV national electricity transmission system; and
- Land which will be required for environmental mitigation, compensation, and enhancement measures

2.4. 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.

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

2.6. 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. Green GEN Cymru has agreed the Tier 3 Enhanced pre-application service with PINS for the Project. This was agreed with PINS in August 2024.
- 3.2. 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 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 Green GEN Cymru to engage with (in most cases the list of bodies is duplicated). There are also differences, for example, in levels of data, approaches to impact assessment and the approach to calculating Net Benefit for Biodiversity / Biodiversity Net Gain. This will add significant complexity to both the Project's interaction with each of those statutory bodies, but also 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), a cable sealing end compound (in Powys), overhead line (through Powys into Shropshire), and a Switching Station (in Shropshire), and 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;
 - Finally, 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 will continue, based on the non-statutory consultation carried out to date.

3.3. Green GEN Cymru 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

3.4. This will be reviewed with PINS as the Project progresses.

4. Programme of Pre-application Activities

- 4.1. *Table 1* below sets-out the key project activities undertaken to-date and those planned between now and submission of the DCO application. A summary of the key activities is presented below.

Key Activities undertaken to-date

- 4.2. The Stage One non-statutory consultation took place between September and October 2023.
- 4.3. The consultation 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. National Grid are yet to determine the location of the new 400kV Substation.
- 4.4. Following the consultation all feedback was analysed and GGC published a Phase One Consultation Feedback Summary (Winter 2023/24) on the Project website.
- 4.5. The EIA Scoping Report was submitted in January 2024 and the Scoping Opinion was received from PINS in March 2024. The Scoping Report included a Scoping Corridor which was based on the consultation corridor for the 2023 non-statutory consultation.
- 4.6. Consultation on the draft DCO documents commenced in January 2025 with PCC and SC, as 'host' local authorities, with both being informally consulted on the draft Statement of Community Consultation (SoCC) from 16 October 2024 to 1 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 SoCC has been made available on the Project website along with a Section 47 Notice, prior to commencement of statutory consultation.
- 4.7. Statutory consultation is underway and will run for 8 weeks from 19th February 2025 until 16th April 2025 in accordance with the SoCC.

Planned Key Activities

- 4.8. It is anticipated that a further period of focused consultation following the close of the statutory consultation period will be required, in view of the linear and complex nature of the Project affecting a wide range of interested parties and the affected communities. This is anticipated to run for 6 weeks starting in September 2025.
- 4.9. Engagement with PINS (and other stakeholders as necessary) on key DCO documents will commence in April 2025 with the submission of a draft Policy Compliance Document for review. This programme of engagement will continue until January 2026, prior to submission of the DCO application, which is planned for February 2026.
- 4.10. A total of eight Progress Meetings with PINS are planned between April 2025 and

January 2026 on a range of matters related to the stage of the Project reached, as outlined in *Table 1*.

- 4.11. PINS review of the 'Adequacy of Consultation Milestone' will be sought in November 2025. 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.
- 4.12. As a final stage in the process, a period of 8 weeks has been allowed between October and December 2025 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(s)
 - Planning Statement
 - Book of Reference
 - Statement of Reasons
 - Funding Statement
 - DCO control documents eg Outline Construction Environmental Management Plan
 - Drafting associated with key issues and/ or novel approaches within the Environmental Statement
 - Policy Compliance Document
 - Design Approach Document
- 4.13. A detailed programme for the submission and review of these documents will be developed in due course and 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.

4.14. 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
PINS/PCC/SC engagement on draft Policy Compliance Document	April 2025
Submit draft Issues Tracker for PINS comments	April 2025
Submit draft Design Approach Document for initial PINS comments	June 2025
Submit draft Land and Rights Negotiations Tracker for PINS comments	June 2025
Supplementary (Focused) Consultation	September 2025
Design freeze	October 2025
PINS Final Review of Trackers (e.g. Land & Rights, Issues, PCD, etc)	October 2025
Engagement with key stakeholders on draft DCO documentation to be submitted to PINS for Adequacy of Consultation Milestone	October 2025
Sharing of Draft DCO documents with PINS for review	October 2025 – December 2026
Sharing of Draft Protective Provisions with affected parties	December 2025 – February 2006
Adequacy of Consultation Milestone	November 2005
Potential Main Issues for the Examination (PMIE)	January 2026
DCO submission	February 2026

4.15. GGC will provide PINS and stakeholders with regular updates regarding programme and the submission date as the project progresses.

5. Engagement

- 5.1. *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).
- 5.2. An outline of other key engagement activity is presented below.

Local Authorities and Statutory Environmental Bodies

- 5.3. Discussions on Draft Planning Performance Agreements (PPAs) are continuing with PCC and SC. Initial meetings have been held.
- 5.4. Discussions have continued, following receipt of the Scoping Opinion, with statutory environmental bodies, including:
 - Natural Resources Wales
 - Natural England
 - Cadw
 - Historic England
 - Environment Agency
- 5.5. These discussions are also covering service level agreements and arrangements under discretionary advice services as relevant to the particular organisation.
- 5.6. 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. Currently it is envisaged these will be needed on ecological and cultural heritage matters (see table 2 below). 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 with PINS and stakeholders and appropriate notice will be provided to attendees. It is currently envisaged that multi-party meetings will be held in June and October 2025 (see Table 2).

Other Stakeholder Engagement

- 5.7. 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 statutory consultation period.

Table 2 – Engagement with PINS

Engagement Undertaken (Date)	Matters Discussed	Planned Engagement (Month)	Topics To Be Covered	Meeting Participants
4 November 2024	Inception Meeting: <ul style="list-style-type: none"> • Project Update • Update from PINS on new guidance • Working Arrangements for the Enhanced Tier Service • Programme Document 			PINS (NIE/EA), GGC project team
		April 2025	Progress Meeting 1: <ul style="list-style-type: none"> • Project update • Consultation update • proposed multi-party meetings • draft Issues Tracker • draft Policy Compliance Doc (approach) • draft Design Approach Document (approach) 	PINS (NIE/EA), GGC project team
		May 2025	Progress Meeting 2: <ul style="list-style-type: none"> • Project update • Consultation Issues 	PINS (NIE/EA), GGC project team
		June 2025	Multi-party Meeting 1 (ecology):	PINS (NIE/EA), GGC project team, NE,

Engagement Undertaken (Date)	Matters Discussed	Planned Engagement (Month)	Topics To Be Covered	Meeting Participants
			<ul style="list-style-type: none"> Ecological assessment methodologies Approach to Biodiversity Net Gain/ Net Biodiversity Benefit 	NRW, Powys CC, Shropshire Council
		June 2025	Progress Meeting 3: <ul style="list-style-type: none"> Project update Approach to further consultation 	PINS (NIE/EA), GGC project team
		July 2025	Progress Meeting 4: <ul style="list-style-type: none"> Project update PINS feedback on draft Design Approach Document 	PINS (NIE/EA), GGC project team
		September 2025	Progress Meeting 5: <ul style="list-style-type: none"> Project update Consultation update 	PINS (NIE/EA), GGC project team
		October 2025	Multi-party Meeting 2 (Archaeology): <ul style="list-style-type: none"> Agreement on further investigation Agreement on mitigation (Archaeological Management Plan) 	PINS (NIE/EA), GGC project team, Heneb, Shropshire Council, Cadw, Historic England

Engagement Undertaken (Date)	Matters Discussed	Planned Engagement (Month)	Topics To Be Covered	Meeting Participants
		October 2025	Progress Meeting 6: <ul style="list-style-type: none"> • Project update • draft Docs for PINS review – kick off • Adequacy of Consultation Milestone 	PINS (NIE/EA), GGC project team
		December 2025	Progress Meeting 7: <ul style="list-style-type: none"> • Project update • draft Docs for PINS review – close out 	PINS (NIE/EA), GGC project team
		January 2025	Progress Meeting 8: <ul style="list-style-type: none"> • Project update • discussion on submission logistics 	PINS (NIE/EA), GGC project team

6. Main issues for resolution

6.1. The main issues for resolution are identified in *Table 3* below:

Table 3: 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 EIA and where possible mitigated through the routing, siting and design of the proposed route. Green GEN Cymru 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.
Landscape and Visual Amenity	Potential for a new National Park to be designated in north east Wales, which may intersect the Project.	The Welsh Government made a commitment in its Programme for Government 2021-2026 to designate a new National Park in north east Wales (the NEW-NP). The Welsh Government has commissioned Natural Resources Wales (NRW) to evaluate the case for the NEW-NP. The current proposed area for the NEW-NP (known as the 'Candidate Area') includes approximately 6.1km of the proposed Vyrnwy Frankton overhead line route and lies less than 3km from a further 23.6km of it. Green GEN Cymru will continue to consult with NRW on the proposals and the NEW-NP location boundaries to determine if there are potential consequences for the Project.

Ecology	Potential effects on ecology including local designated sites and habitats.	<p>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.</p> <p>In addition, the Project will deliver a minimum of 10% Biodiversity Net Gain. The 10% BNG target is not mandated for NSIPs until November 2025. Whilst the approach to measuring biodiversity units will follow the statutory Defra metric, the approach to providing net gain and minimising impacts through routing of the Project aligns with the approach for Planning Policy Wales Net Benefit for Biodiversity.</p>
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. Green GEN Cymru will seek to avoid and minimise effects by design and additional mitigation will be secured through the DCO if necessary (e.g. a Construction Environmental Management Plan (CEMP)).

Potential Main Issue		Green Gen Cymru's Proposed Resolution
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. Where possible, infrastructure will be positioned to avoid or minimise flood risk impacts. A Flood Risk 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.	Green GEN Cymru 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, 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 which the Project will connect into. This does not form part of the Project and the exact location and timescales for this development is currently unknown. Green GEN Cymru will continue to liaise with National Grid with regards to the location and timings of the substation development. The National Grid 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. 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 4* below:

Table 4: 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 detail	Limited resource and capacity of LPAs results in limited engagement on the proposals and inability for the LPAs to provide feedback throughout the pre-application stage of the project, including statutory consultations.	Early engagement with LPAs has commenced and GGC are seeking to agree PPAs with Powys County Council and Shropshire Council. 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 detail	Limited resource and capacity of some statutory consultees could result in limited engagement on the proposals and inability for statutory consultees to provide feedback throughout the pre-application stage of the project, including statutory consultations.	Early stakeholder engagement will be undertaken. GGC will be 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 consistent approach to assessments