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Dear James

Hinkley-Seabank – OFGEM Consultation on Final Needs Case and potential delivery models

The Joint Councils (South Gloucestershire, Bristol City, North Somerset, Somerset, Sedgemoor and West Somerset) have been working together on the Hinkley C Connection Project (HCCP) through pre-application, examination by the Planning Inspectorate and now implementation. Throughout we have worked closely with our communities and with National Grid.

We, therefore, have an extensive knowledge and understanding of the project, most particularly the impact on our areas and communities.

The views set out below represent the views of the lead officers within those Councils.

1. In terms of OFGEM's suggestions on potential delivery models this is not a matter that the Councils have a view on, other than to stress that any delay in delivery would be of significant concern. Mitigation must be put in place in a timely manner to avoid increased impacts through accelerated construction that could be required to meet the required timescales associated with Hinkley Point C if procurement and pre-planning is delayed. In

addition, the transfer of a Development Consent Order to another party has never, to our knowledge, been done and this could lead to an unclear and untested legal position for the local authorities in discharging their planning, monitoring and enforcement responsibilities.

2. We would like to stress that the HCCP has been granted a Development Consent Order by the Secretary of State subject to it being of a particular design and delivering particular mitigation deemed necessary to make it acceptable in planning terms. It is not therefore open to National Grid or any other party to make significant changes to the design or proposals for this scheme without going through the whole application and Examination process again, which would also lead to very substantial delay. Even if a different scheme were applied for, there is no telling whether an alternative scheme design of lattice pylons would be found to be acceptable.

It is entirely incorrect to state that the use of TPylons is 'unjustified': The proposed use of T-pylons on the Hinkley-Seabank project was the subject of a rigorous, robust and transparent examination by the Planning Inspectorate and has been granted development consent by the Secretary of State. The scheme included TPylons as a fundamental part of the mitigation for this project as it crosses a sensitive landscape.

3. The Development Consent Order application and examination process took into account stakeholder views, not least the views of the Joint Councils. It was very important to the Councils' ultimate views on the scheme that T Pylons were proposed on large parts of the route. The Councils accepted the positive benefits of using T Pylons in the Somerset Levels and Moors arising from their reduced visual impact given their lower height. It is also understood that the process of installing T Pylons would be have less impact than lattice pylons.

Were it to be proposed that lattice pylons be substituted for T pylons, then a new consent have to be sought with the delays and uncertainty that would bring. The Council's would need to reconsider their views on the details of the project and the mitigation proposed. Without any doubt, the communities impacted on the route would strongly object to such a change and it would reopen the debate about the principle of the projects as well as the details.

4. Ofgem's current consultation seemingly takes a very narrow view of the benefits of T-pylons by focussing only on 'willingness to pay' values. It makes no reference to the benefits of T-pylons, in the form of reduced visual impact given their lower height. In particular, there is no consideration of how this reduced visual impact mitigated delivery risk. As acknowledged by Ofgem in the consultation, there is an economic need to progress with the project. Refusal to or delay of consent from the Secretary of State would have delayed the connection of Hinkley Point C to the detriment of consumers.

The Joint Councils would welcome the opportunity to meet with OFGEM to explain our thinking in more details or to answer any questions you may have.

Yours sincerely for the Joint Councils;



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