

**National Grid Hinkley C Connection Project
Additional Consultation Stage 1**

Sedgemoor District Council's response.

The Council acknowledges the decision by the National Grid to provide additional information on its Hinkley C Connection Project proposals and extend its period of consultation for stage 1.

The Council resolved at its meeting of 26 July to submit an additional, interim response to the National Grid which makes clear that the Council strongly believes:

“That it would be premature to move to Stage 2 consultation and the selection of a preferred route corridor in advance of more detailed analysis of options”

and

“The subsea route and other strategic alternatives need to remain open as options”.

The Council continues to consider the new information and explore the strategic and policy issues arising from it. Council officers have met with DECC to discuss progress with the draft National Policy Statements and gain a greater understanding of the government's strategy and policy on future on and offshore electricity generation and transmission.

The Council awaits progress with the draft National Policy Statements and further opportunity to influence emerging national strategy and policy, based on experience in Sedgemoor. An approved NPS would better inform the Council's preparation of its Local Impact Report. The Council also questions how the Infrastructure Planning Commission can properly assess whether the Grid proposals are in conformity with national strategy and policy and indeed how the Grid will justify coming to a preferred solution without this guidance.

The Council has concerns over its perceived lack of clarity in the relationship and local accountability between OFGEM, DECC and the electricity generation and transmission industry in shaping policy and strategy, and questions the validity of what appears to be a market led approach to connection offers and transmission based on a notion of acting in the consumer interest. This approach risks a lack of consideration for local impacts and mitigation.

Further guidance on the role of the proposed Major Infrastructure Planning Unit that will replace the IPC and more understanding of the new consenting process for nationally significant infrastructure projects is needed. The Council is concerned that without this clarity the National Grid may not be in the optimum position for delivering the most sustainable solution for our communities.

The Council believes that there is no need for the Grid to commit to a preferred route corridor for its Stage 2 consultation and would welcome discussion with the Grid and

the IPC to ensure that broad options are maintained whilst further detailed investigation is carried out and whilst policy and guidelines develop.

Whilst the Council recognises that work on potential strategic improvement of the Grid must and should continue, there should be no early decision making on strategic choices or local route corridors if an immediate necessity is not demonstrated. There is concern that the proposals for Nuclear New Build and renewable / low carbon offshore and onshore generation may not materialise in the way envisaged and this may impact on the need for re-inforcement at the timescale indicated. Changes to policy, application of Sustainability Appraisal, and higher standards of mitigation will impact on cost and therefore could make an alternative strategic approach deliverable in future. The Council maintains therefore that the options for subsea routing and other overhead line strategic alternatives to this proposal need to remain open.

The Council is also strongly of the view that a full and broad environmental analysis of both proposed route corridors within the District is now conducted rather than only conducting an Environmental Impact Assessment of a preferred route corridor.

The Council maintains that detailed EIA may reveal that a „mix and match“ approach is the best option. Whilst this may emerge in any case following stage 1 consultation, a detailed survey and assessment of both corridors, and interlinking routes, would ensure the best alignment and pylon sites are found.

The Council is concerned that the National Grid are moving toward making a decision on a preferred route corridor ahead of having received full technical and strategic responses from this Authority and other organisations. The Council would benefit from an analysis of consultation responses received by the Grid to help it with its detailed analysis - there may be local information emerging that would help inform its work. The Council recognises that consultation responses are made to the National Grid, and that is for the developer to respond, but urge that an opportunity for review and consideration of the responses is available before any decision on a preferred route corridor commits the National Grid to an option that may not, on later analysis, be the optimum.

Further information may also come from the National Grid's recent proposals for Community Forums and thematic Groups, and similarly the joint Councils Hinkley C Connection Group.

In summary, the Council believes the proposed process for moving from stage 1 to stage 2 in which a preferred route corridor is first identified and then subject to EIA, would be premature and unnecessarily restrictive. The National Grid is urged to allow further analysis and information before any decisions are reached.