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02 September 2025

Dear Secretary of State,

Hinkley Point C request to extend the timescale for removal of the Temporary Jetty to continue marine deliveries to Hinkley Point C Nuclear Power Station construction project

I write in relation to the Hinkley Point C (HPC) Nuclear Power Station construction project and the pending expiration of permission to use a critical item of infrastructure, being a temporary jetty required for marine deliveries.

The Secretary of State is granted the power to extend the date by which the use of the temporary jetty is required to cease, by virtue of article 82(1)(b) of the Development Consent Order (DCO)¹. At present, the date is set as the 31 December 2025. The jetty is used to deliver both critical aggregate for concrete production and reinforcement cages (known as rebar) directly to the site, considerably reducing the number of road traffic movements that may otherwise be required.

On behalf of the project, I request an extension of the date to 27 March 2028. I set out in greater detail below the following matters that may assist with a decision:

- The original permission and purpose of the jetty;
- The current and future benefits of the jetty to the project;
- Our assessment of the environmental implications of an extension of time, with reference to the original Environmental Statement and current management plans;
- Confirmation that licenses are being progressed in parallel with this request for an extended marine license and Harbour Authority consent; and
- A summary of discussions with the local authority and Highway Authority (Somerset Council).

¹ Consent was granted by The Hinkley Point C (Nuclear Generating Station) Order 2013; SI 2013/648

The conclusion of our assessments and engagement with other relevant authorities is that the requested time extension would have clear benefits and no identified harm, such that a positive decision to grant the time extension can be reached. I trust the following details assist with your decision.

HPC Development Consent Order (DCO) – Temporary Jetty

Article 54 of the HPC DCO provides development consent for the temporary jetty works which allow construction materials, specifically rebar and aggregate, to be transported to site via sea. The jetty formed part of the first works on site. The cessation date of December 2025 was expected, at that time, to be some years after the commissioning of both reactors². The current project timeline is for the commissioning of Unit 1 in 2029/2030 and Unit 2 in 2030/31, as the Secretary of State will be aware.

Article 82 of the HPC DCO concerns the ‘Closure of the Jetty’. The existing power to operate and maintain the jetty is due to expire on 31 December 2025, however, due to the project extension, we now seek an extension until 27 March 2028. At present, 27 March 2028 is the date our lease of the land to which the jetty connects will end, and the date by which we intend to have vacated that land. Whilst we intend on disconnecting the jetty from that land prior to this date, we shall fully dismantle, demolish and remove the jetty as soon as reasonably practicable thereafter.

Current Benefits of the Jetty

Article 8.2.2 in Schedule 11 (Transport) of the DCO Legal Agreement mandates that the temporary jetty is used to bring in 80% of all Bulk Materials to HPC, with only 20% to be delivered by road across the full construction phase of the Project. The jetty has been successfully used to bring in large volumes of aggregate and rebar which have been crucial for construction. To date, 1,762,306 tonnes of cargo has been delivered via the jetty, which is a significant majority of the bulk material as expected by the DCO.

Specifically, the jetty is critical to the efficient production of concrete on site with 195,301 tons of aggregates and 81,561 tons of marine sand delivered to HPC via the jetty in 2024 alone.

Equally, as an innovation to improve progress and consistency of work, the jetty is now used for rebar delivery. Rebar is a metal structure that strengthens the concrete blockwork, much of which is now prepared in a bespoke facility at Avonmouth with the cages positioned and attached on-site, rather than made on site, a much longer process. The appendix to this letter provides a graphical illustration of the process for rebar operations as well as several recent photographs of rebar cage logistic movement. The jetty is a key facilitator at the heart of operations when delivering such large pieces

² The HPC DCO Environmental Statement (Section 3, p.4) figure 3.1: HPC Indicative Construction Program, identifies use of the Temporary Jetty throughout the construction period, with its dismantling approximately 2yrs after Unit 1 being operational, and 6 months after Unit 2 is operational.

of equipment efficiently to the HPC site. The jetty received 104 steel cages and 30 meshes from Avonmouth in 2024 with 110 empties returned. During the first half of 2025, the rebar numbers have increased further to 189 steel cages and 22 meshes being shipped to the jetty, with 185 empties being returned. The construction of rebar cages off-site allows their installation to be considerably safer and more efficient.

The use of the jetty for delivery of the cages has reduced HGV movements to and from the site as well as reducing on-site congestion. The DCO requires that HGV movements do not exceed an average of 500 movements per day in any given quarter (following the jetty becoming operational). To date, over 3,300 tonnes of rebar has been transported, which has removed an additional 550 HGV journeys that would otherwise have been made on the route network. Through such approaches, the project continues to keep HGV movements well below the daily average expected in the DCO.

From both a delivery and road movements perspective, the temporary jetty has been and continues to be a fundamental enabler for the Project.

Future Benefit of the Jetty

An extension to the jetty permission would allow its main function of delivering bulk construction materials via the sea to continue throughout 2026 and 2027. This will allow HPC to continue to strive for the '80:20' jetty/road delivery ratio set out in the DCO Legal Agreement. It provides flexibility for significant quantities of aggregate to be received directly at site via the most efficient means possible, keeping the project program on track for operations in 2029-2031. In this regard, our projections are that around 138,000m³ of aggregate is expected to be brought in via the jetty between 2026 - 2028.

As expressed above, to date the Project has been extremely successful at keeping road movements well below the projected daily cap imposed by the DCO Construction Traffic Management Plan (CTMP). On the basis of having continued use of the jetty, the number of HGV movements over the next three years are forecast to remain at a similar level as they are now.

Environmental Statement (ES) and Habitats Regulations Assessment (HRA)

The impacts of operating the temporary jetty were assessed in the original DCO application and its Environmental Statement. The activities associated with the operation of the jetty were recommended to be acceptable, with the following matters considered:

- Disturbance to birds (particularly Shelduck as a qualifying feature of the Severn Estuary SPA) from human activity, lighting, noise, and vessel movements;
- Foreshore habitat loss;
- Disturbance to bats from lighting.

Extending the use of the jetty beyond the original 8-year lifespan will have no change to these impacts. In respect of bird and Shelduck disturbance, both the HRA and ES considered the impacts of operating the jetty to be acceptable, with lighting, noise and human activity being carefully controlled through Environmental Management Plans and with appropriate mitigation and management in place. The impact of vessel activity was considered to be minimal, as birds are habituated to vessel movements and the impact is relatively infrequent and short in duration. It was concluded that the operation of the jetty would not diminish the suitability or capacity of the area to support significant numbers of Shelduck.

Foreshore habitat loss is minimal, representing approximately 20-30sqm. This was assessed as being insignificant and therefore having no measurable impact on the Estuaries Qualifying Feature of the Severn Estuary SAC. The jetty is carefully located to avoid any foreshore impacts on protected intertidal habitat including Coralline Officinalis (red seaweed).

Given the controls within the Lighting Strategy (such as control of light spill, directional lighting and timing of lighting), the impact on bats was considered to be acceptable. It was assessed that neither construction, operation or decommissioning of the jetty would cause loss of foraging habitats or commuting corridors.

Overall, the change in impact from the extended timeframe will be negligible, given that the original impacts were considered acceptable and the required appropriate management measures have been, and will remain, in place.

Marine Licence and Harbour Authority

Currently, the NNB Marine Team are seeking a 3-year extension to the existing marine licence L/2012/00244/5 (Case ref: 35012/101213/5).

Extending the jetty permissions have been discussed with the Harbour Authority on several occasions at recent Harbour Boards and they have no concerns. Under Article 39 of The Hinkley Point Harbour Empowerment Order 2012, we have also begun the process of seeking permission from the MMO to continue to use the jetty beyond the end of this year.

Local Planning Authority and Highway Authority – Somerset Council

NNB have consulted Somerset Council who act as both the Local Planning Authority and Highway Authority. The Council are strongly supportive of the in-principle proposal to extend the timescales associated with the use of the jetty. The Council considers that the continued operation of the jetty provides the opportunity to further minimise impacts associated with the construction stage of HPC, most notably as an effective method for delivering materials to site, reducing the number of road vehicle movements that would otherwise be required, while the quantities of concrete constituents and rebar remain high.

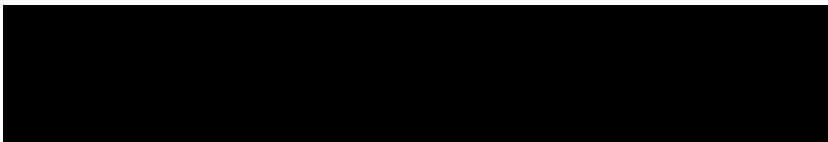
Summary of Request

NNB Generation Company (HPC) Limited kindly request an extension to the date by which the use of the Temporary Jetty, granted under Part 2 of the DCO, should cease. The Secretary of State has powers under Article 82(1)(b) of The Hinkley Point C (Nuclear Generating Station) Order 2013 (the 'DCO' (SI 2013/648)) to provide a *later date* for the closure of the Temporary Jetty. NNB request that the closure date is extended to the **27 March 2028**, after which we shall dismantle, demolish and remove the structure as soon as reasonably practicable in accordance with the Order.

The jetty benefits the project by being able to receive large quantities of construction material and bulky items directly to site via sea, considerably reducing HGV road movements and helping to maintain project momentum. The innovation of producing rebar cages at Avonmouth, which are delivered to site via the jetty, has very substantially reduced the time spent making rebar on site. Extending the use of the jetty will ensure these benefits can continue for the next few years as the civil work moves towards completion.

The Secretary of State has the power to extend the date by which the use of the jetty should cease and we request that this power is used to assist with the ongoing delivery of the project.

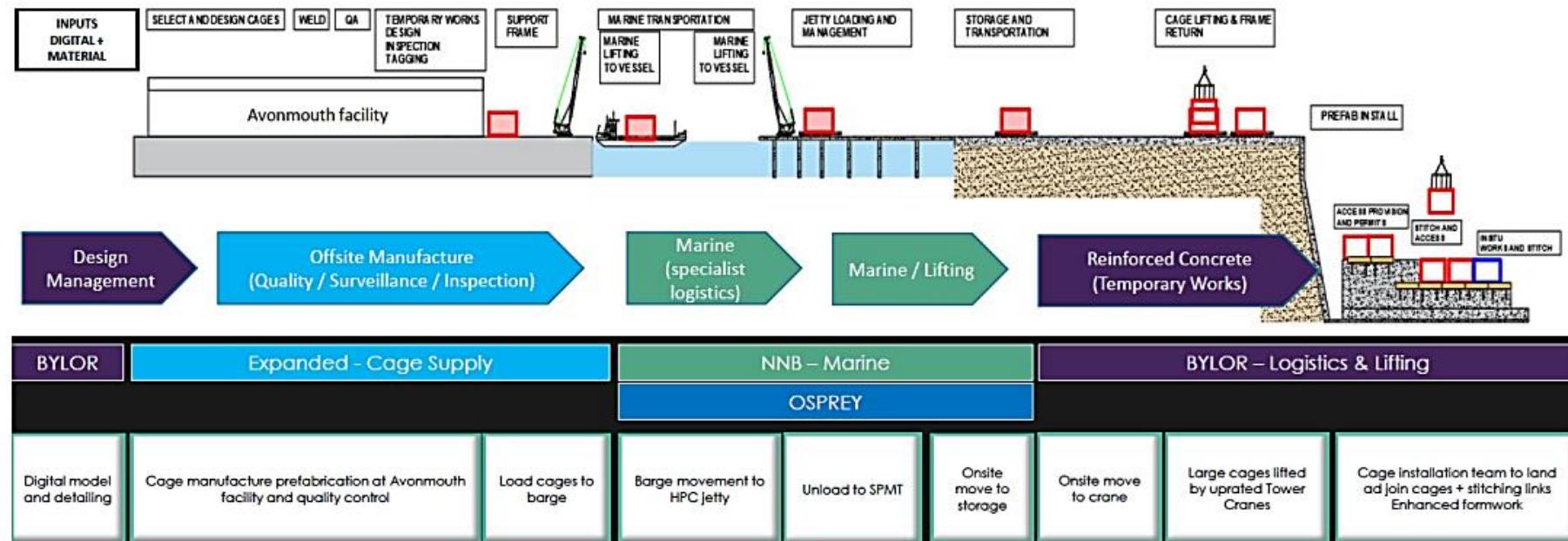
Yours sincerely,



NNB Generation Company (HPC) Limited

Appendix A

Rebar – High Level Scope of Operation



NOT PROTECTIVELY MARKED

Manufacture - Ship, Lift, Installation

