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Mike Waddle
Green Gen Cymru

Your Ref:

Our Ref: EN020035

Date: 23 March 2026

By email

Dear Mike Waddle,

Planning Act 2008 – section 51

Application by Green Gen Cymru for an order granting development consent for Green Gen Vyrnwy Frankton

In reviewing the Vyrnwy Frankton Programme Document and Issues Tracker, the Planning Inspectorate has considered how the material currently presented may support the continued development of the project through the pre-application stage. In providing the observations below, the Inspectorate would also take this opportunity to draw the applicant's attention to the [Nationally Significant Infrastructure Projects: Advice on Preparing Applications for Linear Projects - GOV.UK](#), which sets out expectations and good practice for structuring and presenting information for linear schemes. The applicant may find the principles within that advice helpful when refining the application documents.

Programme Document

The Programme Document sets out a comprehensive pre-application programme, including statutory consultation (completed in 2025), targeted consultation (February-March 2026), and a detailed timeline for draft document review (July-September 2026). The applicant should be aware that this programme is dense, with multiple dependencies across surveys, multi-party meetings, draft document preparation and Inspectorate engagement. Ensuring that the sequencing of activities remains realistic will assist in maintaining programme certainty.

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The applicant may want to review whether there is sufficient time allowed in its programme to address any feedback received on draft documents, noting that section 4.19 of the programme document identifies this review to take place between July and September 2026 and Table 1 proposes a submission in October 2026.

Several draft documents are programmed for Inspectorate review within an eight-week window (July-September 2026), including the Draft Development Consent Order (DCO), Explanatory Memorandum, Land Plans, Consultation Report, HRA Report and Outline Control Documents. While the Inspectorate would welcome the proposed staggered submission of draft documents for this Enhanced-tier case, the applicant may wish to note that, based on our experience, the timetable as currently set out appears very ambitious given the volume of material to be prepared within that period. That said, the number of update meetings and multi-party meetings requiring the Inspectorate's input appears to be reasonable. It is advisable to identify dates for all forthcoming meetings as soon as possible to ensure the availability of relevant expertise. For each multi-party meeting, the applicant should set out the purpose of, and objectives for, the session so that all parties can be prepared and outcome focussed. It would also be helpful to understand the Inspectorate's role at these meetings.

The applicant identifies some planned surveys in Table 3 to begin in the same month as engagement with the consultation bodies to discuss these surveys. It appears there could be a risk of a delay to consultation body engagement, causing a delay to the planned survey programme. This could be reflected in the issues tracker, noting the Inspectorate's feedback that as with the historic environment, every effort should be made to complete and report surveys prior to submission of an application to avoid these being submitted in any examination.

Given the central importance of the draft DCO, it would be most helpful to see this (along with the draft Explanatory Memorandum) as early as possible in July, to ensure sufficient time for review. As far as possible, the draft DCO should include any Protective Provisions that are required. Where Protective Provisions are yet to be agreed, the draft DCO should as a minimum include the names of the undertakers with whom Protective Provisions are anticipated to be required.

In addition to the 'project description' chapter of the Environmental Statement, it would be helpful to see a list of the planned Environmental Statement chapters and annexes (for example in the form of a contents page) which will give an indication of the structure and breadth of the documents to be submitted. The provision of drafts of key DCO control documents or management plans is welcomed.

We would advise that the planned future engagement (Table 3) also includes for relevant consultation bodies to comment on draft documents such as the draft HRA report and Water Framework Directive.

An Adequacy of Consultation review is intended for August 2026, shortly before submission. The applicant may find it beneficial to ensure that any late emerging issues from targeted consultation (February-March 2026) are resolved and clearly reflected in the Consultation Report and associated evidence ahead of that milestone.

As a cross-border project operating within both England and Wales, the Programme Document acknowledges differing planning frameworks, particularly on topics such as Biodiversity Net Gain/ Net Benefit for Biodiversity, overhead line policy, and environmental assessment approaches. The applicant should ensure that methodological choices are clearly justified within the Environmental Statement and early agreement is reached with both sets of statutory bodies to avoid divergence later in the process.

The project involves two host local planning authorities (LPA) (Powys CC and Shropshire Council), Natural Resources Wales, Natural England, the Environment Agency, and a large number of other Consultees. Clarity on how cross border alignment is being managed - particularly where methodological differences exist (e.g., biodiversity units, noise, heritage, water environment) - will support transparency during the examination.

With reference to paragraph 5.8 of the Programme Document, the applicant is encouraged to engage meaningfully with the Ministry of Defence at the pre-application stage to identify any potential objections in relation to aviation and radar interests.

The Programme Document outlines extensive planned multi-party meetings on ecology, water, archaeology, flood risk, and landscape. Given the number of overlapping workstreams, it may be beneficial to ensure that clear records of agreed methodologies, outstanding matters and any identified divergences are captured promptly.

The dependency on Planning Performance Agreements (PPA) with both LPAs is highlighted as a programme risk. Given the planned intensity of engagement (e.g., local impact report preparation, Statement of Common Grounds, design refinement), resolving PPA arrangements early may help support more consistent LPA engagement across key technical areas. Furthermore, the applicant is advised to give serious consideration to the use of PPAs into the post-consent stage, most notably in relation to the discharge of DCO Requirements. Experience on other linear projects is that the discharge of Requirements can be a considerable and resource-intensive area of work for LPAs and that having a PPA in place for these activities can give increased certainty that timely decisions on subsequent approvals can be achieved.

In addition to the potential main issues identified in table 5 of the Programme Document, the applicant should consider whether the topics of Need and Alternatives are likely to be significant issues in any future examination. Experience from other electric lines projects is that these matters are of considerable interest to local communities and can require testing at examination. The Need case should be clearly articulated, with reference to all relevant policy support. Similarly, the Alternatives chapter of the Environmental Statement should explain the approach to consideration of alternatives (including, for example, routing

studies, alternative technologies, undergrounding and siting of permanent and temporary infrastructure). If there are specific alternatives that the applicant knows, from its pre-application engagement, are likely to arise during examination, it would assist to address those matters directly in the application, rather than waiting to respond to a future Examining Authority's questions.

Similarly, experience indicates that Cumulative Effects tend to feature as an important issue in examinations for major electric lines projects due to the high potential for interrelationships with other existing and planned projects. If the location and design of the separate planned National Grid substation in the Lower Frankton area remain uncertain at the point of submission, the applicant should be prepared to update the cumulative effects assessment during the examination in response to those details being confirmed. The applicant may also wish to consider an interrelationship document at this stage.

Issues Tracker

General

Please could the reference numbers in the first column of the tracker be applied to all the lines for ease of reference.

RAG rating – the applicant is advised to review matters that are marked as green but are reliant on discussions that haven't yet started with consultation bodies. These matters should be considered as an 'amber' or 'red' where agreements have yet to be reached with relevant statutory parties on the methodology used, scope of surveys and assessments needed.

The issues tracker includes reference to concerns that have been raised by consultation bodies on an aspect overall, and these are matters marked as amber risks in the tracker. The applicant is advised that it would be helpful for the issues tracker to explain the specific concerns that have been raised and the resolutions proposed.

Several lines in the issues tracker identify technical notes that have been submitted to consultation bodies. It would be helpful if the tracker could identify whether responses were received to these notes or discussions and what those responses concluded. This would allow an understanding of the extent to which these notes have progressed resolution of the identified risks.

The issues tracker would benefit from a separate section to track the status of discussions and the position of statutory bodies on Habitats Regulations matters. Line 1.6.1 identifies risks associated with the need for possible mitigation on Morton Pool SSSI. The Inspectorate notes that this site is also designated as part of the Midland Meres and Mosses Phase 2 Ramsar site and that mitigation may be required to avoid significant effects on this site from the proposed development. Although Ramsar sites are not designated European sites, government policy requires Ramsar sites to be treated as if they are. The issues tracker would benefit therefore from demonstrating discussions specifically in relation to an assessment in the applicant's habitats regulations assessment on this site and any other issues relating to European sites that could be affected by the proposed development.

Given the proposed development spans both England and Wales, the issues tracker should identify and address any risks associated with differences in policy or advice received from the English and Welsh authorities that could affect the assessments presented in the Environmental Statement. This is also acknowledged as a particular complexity of the proposed development within the Programme Document.

Line specific points

Line 1.3.1. The Inspectorate notes that differences in approach to Biodiversity Net Gain and Net Benefit for Biodiversity between English and Welsh authorities and as such, the potential for a methodology to be used that is not approved by stakeholders. Therefore, the Inspectorate advises that the applicant reviews the description of this risk and its RAG rating.

Line 1.4.1 The applicant has previously indicated in its pre-application meeting with the planning inspectorate on the 7 January 2026 that feedback was also being sought from affected English local authorities on intrusive archaeological investigations and the possibility for different local authorities to have different requirements for trial trenching. The issues tracker should also therefore reflect this risk. The Inspectorate advises that for all intrusive archaeological investigations required for the historic environment assessment, that every effort should be made to ensure that these have been completed, reported and the results considered within the applicant's Environmental Statement prior to submission of an application.

Line 1.5.1 The Inspectorate advises that the nature of the concerns that the applicant considers may not be resolved prior to submission are clarified.

Aspect: Ground conditions, traffic and transport and noise and vibration. The Inspectorate notes that there has been limited engagement to date on the identified issues for these aspects, but that the applicant considers that the risk of not resolving matters relating to the receptors and junctions to be assessed is low. The applicant is advised to review the RAG rating for these issues and provide more evidence to clarify why the risk of not resolving matters is low, particularly as issues such as recreation surveys may not follow a standard approach.

The Inspectorate advises that further detail should be provided for each risk where relevant, setting out the specific barriers to agreement and how resolution is being sought. For example, line 1.4.1 sets out that a working group is scheduled to agree the approach on trial trenching and other intrusive works. It would be useful to understand the differing positions between the applicant and stakeholders which to better understand the risk level.

The Government has today published its implementation plan for streamlining infrastructure planning which sets out some information on the timing of reforms to the NSIP process and transitional arrangements that may be of interest to this project:

[Streamlining infrastructure planning: implementation plan - GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/114444/Streamlining_infrastructure_planning_implementation_plan_-_GOV.UK.pdf)

Please contact us if you have any further queries.

Yours sincerely,

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Jake Stephens

Jake Stephens
Case Manager

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