

National Infrastructure Planning
The Planning Inspectorate
Temple Quay House
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Our Ref: 27102/A3/BL/nfi/161018
Your Ref: EN010007

Planning Act 2008 (as amended) – Section 88 and the Infrastructure Planning (Examination Procedure) Rules 2010 (as amended) – Rule 6

Application by Horizon Nuclear Power for an Order Granting Development Consent for the Wylfa Newydd Nuclear Power Station

Dear Sir / Madam

We refer to the above and your letter ('Rule 6 letter') dated 25th September 2018. On behalf of our client, North Wales Police (NWP), we can confirm that we will attend the Preliminary Meeting on 23rd October 2018.

We have some initial observations to make with regard to the timetable and principal issues identified in your letter of 25th September. These points are expanded upon below.

Principal Issues

NWP covers the whole of North Wales, including the counties of Isle of Anglesey, Gwynedd, Conwy, Denbighshire, Flintshire and Wrexham and as such has responsibility for the provision of policing for the development, including its associated works and its impacts.

Based on all the information seen to date, NWP submit that the development will have a significant impact on the organisation and the public it serves, which at present in the application is not adequately mitigated. These impacts relate to services provided across the force. The key issues of interest for NWP relate to the impacts of the proposed development on the resources and infrastructure required by NWP to maintain a safer North Wales for all, and the measures and mechanisms to mitigate these impacts. These issues were identified in our Relevant Representation and included:

- Workforce and Transport
- Marine Off Loading Facility
- Protest
- Monitoring and Reporting
- Intangible Impacts



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Following an extensive review of the application documents, it is our client's view that there are a number of areas where the submission either lacks sufficient data to allow a robust assessment of impacts to be made, particularly around traffic impacts and the MOLF, or has utilised questionable baseline data in assessing scheme impacts, specifically in relation to traffic and transportation.

In light of this, our client will attend all hearing sessions in relation to those issues outlined below. Our client will also be in attendance at the Preliminary Meeting, accompanied by Barton Willmore and legal representation from Womble Bond Dickinson (UK) LLP.

- **Principal Issue 5 – Draft Development Consent Order (DCO)**

Any mitigation proposed to address the impacts of the proposed development on policing will need to be secured either through a s106 agreement or through DCO requirements. As a minimum, NWP will be seeking to be a signatory to any s106 agreement relating to the scheme which provides mitigation on police matters, and to be named as an appropriate consultee in any requirements relating to matters impacting upon police duties and functions. Our client will also be seeking to ensure that an appropriate monitoring and reporting mechanism is agreed to ensure adequate mitigation is delivered through the construction and operation of the proposed development. NWP therefore needs to be involved in the drafting and agreement of DCO requirements, accompanying plans and obligations in order to minimise the effects on service provision.

The above matters are under discussion with both the Promoter and the Isle of Anglesey County Council. As an agreed position has yet to be reached, our client wanted to ensure the ExA had visibility of these matters from the outset. We will keep the ExA informed of progress with these discussions throughout the Examination as it is critical that agreement is reached to ensure the development can be appropriately policed.

We would add, in this regard, that no specific time has been allocated within the Rule 6 letter for interrogation and discussion surrounding the various section 106 obligations. This was, as the Examining Authority will be aware, a key part of the Hinkley Point C Examination, as will be the case here. It is therefore considered that adequate time needs to be allocated within the various Deadlines and hearings to consider specific questions the Examining Authority may have.

- **Principal Issue 10 – Socio-economic Effects**

We note that this issue relates to the impacts of the proposals on the receiving communities and refers to 'law and order considerations'. This encompasses a wide range of potential impacts, including *inter alia* local police services, custody provision, and road policing. The potential impact of protest action against the proposed development also need to be appropriately assessed and adequately mitigated.

The impacts of the proposed development on these areas of service will require detailed consideration as part of the Examination. NWP will be submitting evidence to demonstrate the potential impacts and the mitigation required to the ExA for consideration.

- **Principal Issue 11 – Traffic & Transport**

We welcome the identification of the "effects on emergency services" as a principal issue for the ExA. However, NWP is concerned that the baseline data used in the submitted Transport Assessment has resulted in the impacts of the proposed development on the highway network being potentially underestimated. The application does not contain sufficient information to allow NWP to validate the traffic modelling that has been undertaken and as a result is has been difficult to fully assess impact. NWP considers that additional work is required in the assessment of accident data particularly in relation to the Britannia Bridge.

We suggest that an Issue Specific Hearing session is scheduled as early as possible in order for the short-comings of the submitted Transport Assessment to be discussed and resolved. This Hearing should also consider the impact of the proposed development cumulatively with the North Wales Connection DCO now that the application has been made and accepted for Examination.

Procedural Matters

Our client will attend all Hearing Sessions relating to the Draft DCO and the issues highlighted above. We also reserve the right to attend other Hearing Sessions once the ExA has issued the specific agendas.

Further, detailed comments will be provided through the submission of Written Representations to the Examination.

We can confirm that we are currently in negotiation with the Promoter with respect to a Statement of Common Ground. We will ensure that the ExA is kept updated on progress with the SoCG as the Examination proceeds.

We trust the content of this letter assists the ExA in identifying issues to be considered through the Examination. Should further correspondence with NWP be considered beneficial, please do not hesitate to contact us.

With kind regards

Yours sincerely



Ben Lewis
Infrastructure & Energy Director