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National Infrastructure Planning  
Temple Quay House  
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Via email

Dear Sir/Madam

## **Wylfa Newydd Nuclear Power Station**

I write on behalf of Partneriaeth Cynghorau Gogledd Mon, the North Anglesey Councils' Partnership, which is a collaboration of 6 Town and Community Councils in the North Anglesey area: Amlwch Town Council, Llanbadrig Community Council, Mechell Community Council, Llaneilian Community Council, Rhosybol Community Council and Cylch y Garn Community Council, along with Menter Mon and Hyfforddiant Parys Training as invited participants. As well as interests that these individual Councils have with regard to the Wylfa Newydd proposals, there are also cross-Council interests and the Partnership's role is to pursue these interests with Horizon to the benefit of all of the North Anglesey area.

From reading a number of the other registrations from interested parties and the relevant representations they have made, it has been noted that the adequacy of consultation has been called in question. The Partnership feel it would be useful to add their experience of the consultation process to those already submitted.

Since at least 2012, the constituent Town and Community Councils have attempted to engage with Horizon via the Wylfa Newydd Project Liaison Group, individual meetings of Community Councils and since 2016 via the NACP. Over this time, the Partnership has requested information from Horizon to help it understand the proposals, why choices have been made in the evolution of the project and how assessment results have been identified. This has been in response to information presented directly by Horizon in meetings with the Partnership or constituent members, and from their PAC1, PAC 2 and PAC 3 consultations.

Certain information has been provided over this time, but the Partnership has not been provided with much of the information they have requested, or been promised by Horizon. This led to the Partnership raising concerns with Horizon of a situation where information was not made available until the DCO submission. This situation would mean that the opportunity to have meaningful input into the pre-application process would have been missed, and there would be minimal time available to review and comment on the information due to the timeline of the DCO process.

It is the Partnership's view that this is the exact situation which has arisen. Three consultation stages have been undertaken, each of which has raised questions of detail from the Partnership, but the project has then moved on without answers to these questions being provided. The next stage then sees a build-up of queries, or new queries emerging, depending on whether relevant aspects of the project have changed or not. We have now arrived at DCO submission, with some details to answer the Partnership's questions having now been identified, some no doubt elsewhere in the DCO documents but not found yet, but some seemingly still not available.

Subjects where unsatisfactory information has been provided includes:

- The use of Rhosgoch as a temporary worker's accommodation site in order to provide genuine legacy benefits to the site.

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- Conflicting information has been provided between direct responses from Horizon, and the DCO documentation, on the working hours of construction personal. Communications from Horizon have stated a 38-40 hours week, information in the DCO documentation indicates a 57+ hour week.
- Specific numbers of properties are identified as being subject to significant adverse effects from construction activities however these properties are not able to be identified individually to ascertain exactly which properties are affected.
- Evidence used to discount a Wales Coastal Path route around the coastal side of the WNDA.
- Potential use of minor roads as 'rat runs' in the Rhosybol, Llanfachell and Tregele areas, and measures to prevent such use.
- Road improvements requirements on A5025 between WNDA and the 'Pig y Rhos' (Shell) junction (330m west of Burwen Road).
- Lack of social housing (rather than affordable housing) in Amlwch
- Details of housing fund.

The Partnership's understanding of Nationally Significant Infrastructure Projects is that they should involve 'front-loaded' consultation, that allows participants to have a real involvement in the development of the scheme. Horizon have always encouraged the Partnership to believe that their comments and concerns were being considered and that effective local mitigation and community benefits would be forthcoming. The publication of the DCO documents however provides the impression that many decisions were taken outside of the consultation process and with no consideration of the views expressed by participants. One example of this is the influence of the optimisation study: the results of this provided a significant change to the scheme that overrode the previous proposals or relevant consultation comments received.

The Partnership feel that Horizon's actions have been deliberately designed to keep the Partnership, and other participants, engaged and to 'tick the box' that consultation is happening, but to avoid conversations over difficult subjects. With information now being made available with the DCO documents, conversations can happen, but opportunity to influence the design has been lost and the time available for discussions is now limited by the DCO procedures. The Partnership are therefore of the opinion that Horizon's consultation procedures have been flawed and have side-lined the Partnership in the process.

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