

**From:** [Ben Lewis](#)  
**To:** [Kay Sully](#); [Wylfa Newydd](#)  
**Subject:** Proposed Development Consent Order at Wylfa Newydd (Ref: EN010007) - Response to Examination Deadline 2  
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[image308450.png](#)  
[NWP Submission for Wylfa Newydd DCO Deadline 2 \(REF WN-NWP-DL2 v1\).pdf](#)

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Kay

On behalf of North Wales Police, I am pleased to submit a response to Examination Deadline 2 on behalf of North Wales Police. The attached document comprises the following:

- a) Written Representations (WRs);
- b) Responses to the ExA's Written Questions;
- c) Comments on the updated application documents submitted by the Applicant in response to Section 51 advice;
- d) Comments on the information submitted by the Applicant on 17 October 2018 in relation to the Blasting and Vessel Movement Change Requests;
- e) Comments on any additional submissions that were received after the close of Relevant Representations; and
- f) Responses to any other information as requested by the ExA.

On behalf of North Wales Police, I would also like to notify you of our intention to attend and make oral representations at the following:

1. Issue Specific Hearing on Socio-Economic Matters and Traffic & Transport on 7<sup>th</sup> January 2019;
2. Issue Specific Hearing on Socio-Economic Matters and Traffic & Transport on 8<sup>th</sup> January 2019; and
3. Issue Specific Hearing on the draft DCO on 9<sup>th</sup> January 2019;

I would be grateful if you could confirm receipt.

Many thanks and kind regards

Ben

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**NORTH WALES POLICE**  
A safer North Wales

**WYLFA NEWYDD NUCLEAR POWER STATION PROJECT DEVELOPMENT CONSENT  
ORDER APPLICATION**  
**PLANNING INSPECTORATE REFERENCE: EN010007**

**Deadline 2 Response  
ON BEHALF OF NORTH WALES POLICE**

**Doc Ref: WN-NWP-DL2 v1  
4<sup>th</sup> December 2018**

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- Appendix 2: North Wales Police Responses to Pre-application Consultation Stages 1, 2 & 3
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## 1 INTRODUCTION

- 1.1 On 6th November, the Examining Authority (ExA) issued a timetable for the Examination in accordance with Rule 8 of the Infrastructure Planning (Examination Procedure) Rules 2010.
- 1.2 This Rule 8 letter requested the following submissions to be submitted by Interested Parties by Deadline 2 on 4th December 2018.
  - a) Written Representations (WRs);
  - b) Responses to the ExA's Written Questions;
  - c) Comments on the updated application documents submitted by the Applicant in response to Section 51 advice;
  - d) Comments on the information submitted by the Applicant on 17 October 2018 in relation to the Blasting and Vessel Movement Change Requests;
  - e) Comments on any additional submissions that were received after the close of Relevant Representations;
  - f) Notification of wish to make oral representations at any Issue Specific Hearing on the draft DCO;
  - g) Notification of wish to make oral representations at an Issue Specific Hearing;
  - h) Notification of wish to attend an Accompanied Site Inspection; and
  - i) Responses to any other information as requested by the ExA.
- 1.3 North Wales Police (NWP) is registered as an interested party and is participating in the Examination. NWP is responsible for the provision of policing for and in the vicinity of the Wylfa Newydd Nuclear Power Station and, if consented, the construction and operation of the nuclear power station will have a significant impact on police demand.
- 1.4 This document provides NWP's responses to the matters identified in the Rule 8 letter. With respect to the ExA's First Written Questions, the responses to questions directed at NWP are provided throughout the document. For ease of reference, however, the schedule in Appendix 1 includes the text for each question directed at NWP, together with the response. The questions have been included in numerical order as per the questions issued. In addition, where it is considered that input from NWP would assist the ExA in respect of questions directed at other parties, responses have been provided. Relevant cross referencing to other DCO documentation, either revised or as submitted has also been provided where appropriate.
- 1.5 The remainder of this document is organised as follows:
  - North Wales Police: Role & Responsibility
  - Pre-Application Engagement – Responses to PAC 1, 2 and 3
  - North Wales Police: Summary of Assessment of Impact on Police Demand
  - Written Representations on Specific Impacts
  - Plans Accompanying the DCO
  - The Development Consent Order and Explanatory Memorandum
  - Section 106 Obligation
  - Conclusions

## 2 NORTH WALES POLICE: ROLE & RESPONSIBILITY

- 2.1 NWP covers the whole of North Wales and includes the counties of Isle of Anglesey, Gwynedd, Conwy, Denbighshire, Flintshire and Wrexham. The area is mostly rural and also includes the Snowdonia National Park. It has a vast coastal area around Anglesey, the Llyn Peninsula and the north coast of Wales.
- 2.2 NWP has approximately 1,500 police officers, 220 Police Community Support Officers and 1,100 police staff serving a population of 687,800 people. NWP's Headquarters are in Colwyn Bay with divisional headquarters in St Asaph, Caernarfon and Wrexham. The Force is led by Chief Constable Carl Foulkes, T/Deputy Chief Constable Richard Debicki, T/Assistant Chief Constable Neill Anderson and Richard Muirhead, Interim Director of Finance and Resources.
- 2.3 The Eastern part of North Wales contains the most populous areas, such as Wrexham and Deeside, while popular coastal resort towns include Rhyl, Llandudno and Pwllheli. North Wales has two cities, namely Bangor and St Asaph, Bangor is a University City which houses approximately 16,605 students. The A55 (part of the Strategic Road Network) links the area to cities like Manchester, Liverpool and Birmingham and the Port of Holyhead on Anglesey which provides links to Ireland.
- 2.4 NWP's established vision and priorities are as follows:

*“Our vision is a safer North Wales. It is very difficult to predict the future, but whatever happens, we will be here to protect our communities.*

*Our priorities are:*

  - To protect our communities, in public, private and online*
  - To pursue those who cause the greatest harm*
  - To prepare our capabilities for the future”.*
- 2.5 The North Wales Police and Crime Commissioner (PCC) is responsible for holding the Chief Constable to account to ensure that the force supports the delivery of the objectives detailed in the Police and Crime Plan 2017 - 2021 and to meet all their statutory duties. Arfon Jones was elected as the PCC for North Wales on 5th May 2016. He will remain in office until the next elections which will be held in May 2020.
- 2.6 Community Safety, and the prevention and detection of Crime and Disorder are key statutory obligations for NWP. Any major development proposals which could impact upon the ability of NWP to meet these obligations need to be carefully scrutinised to ensure adequate resources and provisions are put in place to allow NWP to maintain current levels of provision to the communities it serves.
- 2.7 The proposed Wylfa Newydd Nuclear Power Station and its associated developments (the Project), along with the expected transient workforce during construction, will have a significant impact on the demand on police resources in the area and beyond. The proposed development is estimated to require 9,000 construction workers at peak construction, of which an estimated 7,000 will be non-home-based, with a further 505 dependants. The promoter, Horizon Nuclear Power (HNP), also estimates that 1,705 (19%) of the 7,000 workers could come from overseas. These workers could potentially introduce diversity that does not currently exist on Anglesey.
- 2.8 Impacts directly arising from the development will result in a requirement for additional resources, staff and equipment and will place an additional financial burden on NWP's current restricted budget.

2.9 To define the potential impact of the proposed development, NWP has undertaken a full and robust assessment that considers the challenges that the development poses for NWP and seeks to establish and validate the potential mitigation implications for HNP. This assessment work has taken place over the past 6 months and has involved careful consideration and planning by NWP, given the significance of the Project and its potential impacts. The requirements identified by this assessment are directly related to this development and are intended to ensure that the development does not have a significant adverse impact on the current service levels delivered by NWP to the communities it serves. The results of the assessment are set out in section 4.

### **3 PRE-APPLICATION ENGAGEMENT – RESPONSES TO PAC 1, 2 AND 3**

- 3.1 NWP has continually engaged with the DCO process since 2014. Responses were provided to all three pre-application consultation stages carried out by HNP. An overview of the responses provided at PAC1, PAC2 and PAC3 is included below to provide context to the written representations presented in later sections of this document.
- 3.2 Copies of NWP's response to each pre-application consultation are included in Appendix 2.

#### **PAC1**

- 3.3 In its response to PAC1 (dated 5<sup>th</sup> December), NWP made it clear that its existing budgets were based on the baseline population in North Wales and that any additional resource requirements resulting from the Project would need to be mitigated via section 106 funding for police services.
- 3.4 In its 2014 PAC1 response, NWP identified the following specific areas that would have a direct impact upon its service provision:
  - i. Significant increase in work force population that brings in a transient population impacting upon the general policing of the area and community safety;
  - ii. Increase in the need for equipment and facilities in regard to the direct impacts of the increased workforce population and the resultant increase of crimes and associated events. This will include officer equipment, training and could include contributions to buildings, vehicles, ANPR, and communications equipment;
  - iii. Protest and disturbances against the development at or near the site;
  - iv. Police resources to comment and assess consultation documents to be aware of intelligence regarding activities;
  - v. Providing input into the planning process; and,
  - vi. Incident planning and intelligence planning in terms of health & safety and ongoing operation.
- 3.5 From the outset, NWP has sought to work closely with HNP and the affected local planning authorities to ensure that the impacts upon the police service in the locality are suitably mitigated.

#### **PAC 2**

- 3.6 NWP's response to PAC 2 was submitted in October 2016. The specific areas of comment are summarised below:
  - Increase in demand for police services resulting from the influx of workers for the development in relation to:
    - Pressures from the increased night-time economy;
    - Incidents and crimes on sites requiring police attendance;
    - Increase in response times;
    - Protest;
    - Operational Planning;
    - Roads Policing;

- Custody Capacity;
- Officer numbers and recruitment especially in specialist roles;
- Police station location and capacity;
- Translation services;
- Safe guarding the most vulnerable and those likely to be exploited; and
- Cyber-crime relating to both businesses and individuals during the build and operation.
- **Workforce Code of Conduct** - NWP requested that HNP engage thoroughly in the composition and enforcement of the code as it will be essential in maintaining community cohesion and safety for all.
- **Marine Offload Facility (MOLF)** - Further detail was requested on marine security and the potential for waterborne protest.
- **Traffic & Transport** - NWP confirmed its disagreement with the PAC2 statement that the Project would not result in any highway capacity or highway safety impacts on the A5025 that would justify physical intervention. NWP also disagreed with HNP's view that accidents on the A5025 were caused by excessive speed and poor driving. As such, NWP requested that HNP re-examine the options for the A5025 between Wylfa and Amlwch.

NWP also requested that the following traffic and transport issues were considered further prior to the submission of the application:

- Integrity of the Key routes including the A5025, the strategically important A55 including the Britannia Bridge, and how they will be kept open at all times, given existing congestion and frequency of incidents (the A55 had been closed a number of times due to incidents for up to 10 hours at a time);
- Whether stacking/staging areas should be identified along key routes, including on the mainland, in the event of route closure;
- A wider assessment of the A55 and A494 to the English border as both workers and goods will have to travel along these routes to the Island;
- How emergency response times to incidents will be maintained;
- Consideration of the need for average speed cameras or variable speed limit capability for the Britannia Bridge to reduce the likelihood of accidents and structural damage resulting in road closures from the increase in traffic;
- Consideration of the impacts on other arterial routes off the A5025 including the suitability of alternative routes as local residents and others will seek to avoid traffic lights and disturbance wherever possible;
- NWP should be identified as Key Stakeholders for consultation; and
- Robust traffic management plans for construction and operation are required to control both staff and HGV movements both to and from the main site and associated developments.

- **Building Design** – HNP must achieve Secured by Design (SBD) certification for the permanent housing and temporary accommodation.

- **Factual corrections** – the PEIR identified 5 police stations within the KSA when there are 10 police stations - Llangefni, Amlwch, Benllech, Holyhead, Menai Bridge, Caernarfon, Bangor, Bethesda, Llanberis, Penygroes.
- **Equality Impact Assessment** – NWP confirmed it was satisfied with the contents of the document at PAC2 stage, but requested that the document is regularly updated as the Project progresses.

### **PAC 3**

3.7 NWP submitted its response to PAC3 in a letter dated 22nd June 2017. This submission confirmed that, in NWP's view, the key issues raised at PAC2 were still of concern because the vast majority had not been assessed or resolved in either the project update or the Pre-Application Consultation Stage 3 (PAC 3) documentation. The letter raised concerns that despite repeated attempts to engage with HNP, the level of communication and consultation with NWP had been severely lacking, particularly in respect of the assessment and agreement to provide mitigation for the impacts of the Project.

3.8 Based on the information made available during and prior to PAC3, NWP remained of the view that the proposed development would have a significant impact on the organisation and the public it serves. NWP confirmed its position that HNP needs to ensure that NWP will be adequately resourced to ensure that policing is fully effective in the area and can cover all eventualities without detriment to the existing communities.

#### **4 NORTH WALES POLICE: SUMMARY OF ASSESSMENT OF IMPACT ON POLICE DEMAND<sup>1</sup>**

4.1 In accordance with its statutory duties, NWP has prepared a detailed assessment of the effect the Project will have on police demand. This assessment has identified a significant impact, particularly during construction of the Project. A copy of the resultant Police Impact Assessment report (PIA) is included in Appendix 3. The Project's potential impacts on the resources and infrastructure of NWP to maintain a safer North Wales for all is of the upmost importance and NWP has therefore registered as an interested party and is participating in the DCO examination.

4.2 The assessment of the potential impact of the proposed nuclear power station evidences the mitigation that is required to effectively police the North Wales area, for the lifetime of the proposed development but particularly during the construction period. NWP is seeking a financial contribution from the Applicant, HNP, to mitigate this impact. The mitigation identified is broad; however, it is fair and proportionate to the scale and complexity of the proposed development. The PIA sets out realistic mitigation to address the influx of 7,000 additional non-local workers and the detrimental impact this population increase will have on policing. In addition, NWP wishes to secure the approval, ongoing monitoring and review of all the DCO plans considered relevant to NWP's statutory functions through an Emergency Services Engagement Group (ESEG).

4.3 It should be noted that in order to inform the PIA and proposed mitigation, NWP has been in dialogue with the Avon and Somerset Constabulary with respect to the policing difficulties encountered following the grant, and associated implementation of, the Hinkley Point C (Nuclear Generating Station) Order 2013.

4.4 The PIA has identified specific impacts on the workings and operation of NWP in relation to the following service areas:

- Local Policing Services - Response, Neighbourhood Policing Team and Local CID
- Custody
- Operational and Emergency Planning
- Road Policing Unit - RPU and Commercial Vehicle Unit
- Force Control Centre
- Managed Response Unit
- Investigation Support Unit
- Crime Services - All functions
- Administration of Justice
- Programme Management and Support

##### **Local Policing Services - Response, Neighbourhood Policing Team and Local CID<sup>2</sup>**

4.5 In Wales there is a strong positive correlation between population and reported incidents and crime; meaning areas with larger populations experience more reported incidents and crime.

<sup>1</sup> Summarised from Wylfa Newydd – Assessment of Impact on Police Demand V3.0

<sup>2</sup> Section 5.1, Pages 10 – 11 and Appendix A - Wylfa Newydd – Assessment of Impact on Police Demand V3.0

- 4.6 Models based on this principle show the estimated population increase due to the additional 7,000 non-local workers at the point of the Peak Worker Scenario in 2023 as defined by HNP is likely to result in a 7.8% increase in crime and a 6.1% increase in reported incidents.
- 4.7 A resource allocation model based on the predicted increase in demand shows that there will be a requirement for an additional 17 officers in the Anglesey and Gwynedd North area at peak. This reflects the expected increase in demand due to the increase in population alone and does not reflect the impact of any additional policing activities that may be required in relation to the Project.

### **Custody<sup>3</sup>**

- 4.8 Custody units provide detention facilities across North Wales. By managing and monitoring the progress of investigations, custody staff ensure maximum use is made of the initial period of detention, reducing the need for bail and ensuring charge decisions are made at the earliest opportunity. This reduces the likelihood of further crimes and anti-social behaviour (ASB) being committed and helps increase community confidence in the police.
- 4.9 It is assumed that the impact on the custody function will be limited to Caernarfon Custody Suite because this is the only active custody suite in the West.
- 4.10 The analysis estimates the potential increase in custody demand experienced as a result of the increase in the residential populations in Anglesey and Gwynedd North due to the Project. An “as-is” utilisation model for custody has been built which seeks to mimic custody demand and staff utilisation.
- 4.11 It is not expected that the increase in population and any associated increase in arrests would result in the requirement for the opening of another custody suite. However, projections indicate that one additional resource would be required in Custody in order to meet peak demand.

### **Operational and Emergency Planning<sup>4</sup>**

- 4.12 Operational Support Services (OSS) has corporate ownership of Operational and Emergency Planning matters. The Department has the responsibility for the development, maintenance and exercising of all plans which are associated with the above core responsibilities, including security planning around some key subject areas.
- 4.13 The various stages of the development programme for the Project will bring about varying challenges to the Department, which will be required to draw up plans and contingencies for the different stages of such a large construction project. Each stage will require differing levels of planning and engagement. It is clear that dedicated planners will need to be involved from the outset.
- 4.14 On the basis of the information provided by HNP and the assessment undertaken, the department would require two additional staff at peak worker scenario to cope with the additional demand and ensure that the development does not adversely affect the operation of NWP and consequently the public of North Wales.

<sup>3</sup> Section 5.2, Pages 11 – 12 and Appendix C - Wylfa Newydd – Assessment of Impact on Police Demand V3.0

<sup>4</sup> Section 5.3 Pages 12 – 13 and Appendix D - Wylfa Newydd – Assessment of Impact on Police Demand V3.0

### **Road Policing Unit (RPU) and Commercial Vehicle Unit<sup>5</sup>**

- 4.15 Road safety is of paramount importance alongside ensuring that the local communities remain safe and reassured during the duration of the build.
- 4.16 The current structure of the RPU will not be able to deal with the demands that will be encountered as a result of the Project. Therefore an increase in establishment will need to be seen within the RPU in order to effectively police the roads on the Isle of Anglesey, the surrounding areas of Gwynedd Local Authority and the A55 corridor.
- 4.17 An assessment has been prepared in order to quantify such an impact and this has been finessed over a period of several months. It is currently being reviewed a final time by an external consultant, Vectos. This RPU-specific assessment will be submitted for Deadline 3.
- 4.18 In refining such an assessment, NWP is working with its consultants to examine in detail the traffic analysis and assumptions in the DCO application documents. This has identified, as is set out in section 5 of this document, material deficiencies in the traffic and transport assessment undertaken by HNP. Clearly any deficiencies in HNP's assessment will impact upon the work undertaken by NWP and any assessment produced must be caveated on this basis.

### **Force Control Centre (FCC)<sup>6</sup>**

- 4.19 To estimate the impact of the increase in population on the number of calls into the FCC, a model has been created which uses the relationship between the number of calls and the population levels, at a Force level, to provide an estimate of the expected increase in calls given an increase in the population.
- 4.20 There is a very strong (+0.9) correlation between the number of 999 calls and the number of 101 calls. Therefore it is assumed that 101 calls would rise by the same proportion as 999 calls.
- 4.21 It is estimated that an additional two Communications Operator resources would be required to mitigate the impact of the proposed development.

### **Crime Services, Administration of Justice (AJD), Managed Response Unit (MRU) and Investigation Support Unit (IST)<sup>7</sup>**

- 4.22 Due to the additional demand created by population being far reaching across the force, amongst smaller teams, and impacting on areas with limited baseline data available (i.e. Modern Day Slavery), the approach to the impact on these departments needed to differ from the previous evidence led service assessments.
- 4.23 Following consultation with NWP Analysts, a standard uplift methodology has been utilised to effectively represent the additional workload for functions that historically have limited data available. This calculation intends to fairly and transparently justify the additional resources in each individual section.
- 4.24 Seven additional resources across all these departments have been identified. These are outlined below.

<sup>5</sup> Section 5.4, Pages 14 – 15 - Wylfa Newydd – Assessment of Impact on Police Demand V3.0

<sup>6</sup> Section 5.5 Pages 15 – 16 and Appendix F - Wylfa Newydd – Assessment of Impact on Police Demand V3.0

<sup>7</sup> Section 5.6, Page 17 - Wylfa Newydd – Assessment of Impact on Police Demand V3.0

## **In-Life Management - Programme Management and Support<sup>8</sup>**

- 4.25 As is evident from the level of detail contained within DCO application and breadth of the Rochdale Envelope principle applied in the envelope of the environmental impact assessment, there will be a continuous need to monitor, review and implement changes to NWP's operational model both in preparation for and during construction.
- 4.26 In order to achieve this, NWP will require dedicated members of staff to coordinate and manage the change. These roles will have responsibility for the internal and external liaison, both with HNP, its contractors and other partner agencies, ensuring NWP internal governance is adhered to and producing and maintaining long term plans. At peak, an additional two resources would be required.

### **Police Facilities**

- 4.27 In order to accommodate the required additional Local Policing resources NWP's Facilities & Fleet Department have undertaken a feasibility study and reviewed a number of options for additional facilities. The options included utilising existing buildings (either purchased or leased) for additional facilities or using existing NWP estate for the additional facilities required (either through new build or extending current properties).
- 4.28 The feasibility study concluded that the most appropriate and cost-effective outcome was using land that was already part of the NWP estate and to a build a new police station.<sup>9</sup> Based on the operational requirements predicted in the PIA, Amlwch was chosen as the preferred location for a purpose-built new facility. Discussions with HNP on the potential to utilise temporary accommodation provided within one of the development sites rather than a permanent facility on the NWP estate are on-going.

### **Other capital requirements**

- 4.29 Additional capital investment is required in vehicles and IT equipment to support the core policing services.

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<sup>8</sup> Section 5.8 Page 18 - Wylfa Newydd – Assessment of Impact on Police Demand V3.0

<sup>9</sup> Section 6, Page 19 and Appendix B - Wylfa Newydd – Assessment of Impact on Police Demand V3.0

## 5 WRITTEN REPRESENTATIONS ON SPECIFIC IMPACTS

5.1 NWP submitted its relevant representation on 13<sup>th</sup> August 2018. This identified the key issues that are predicted as a direct result of the proposed development. These include:

- Workforce and transport;
- Marine Off-loading Facility (MOLF);
- Protest
- Monitoring & Reporting; and
- Intangible impacts.

5.2 NWP sets out below its written representations on the specific elements of the Project, which will impact on NWP and its statutory duties and its concerns regarding these particular elements of the Project.

### **Workforce and Transport**

5.3 NWP has commissioned Vectos to carry out a review of the traffic and highways issues relating to the Project. This has included a review of the Transport Assessment (AP-101 -June 2018) and various other documents linked to transport and highway issues, alongside a review of the transport assessment<sup>10</sup> submitted in connection with the North Wales Connection DCO (Ref EN0020015).

5.4 This initial review identified a number of key concerns relating to the Transport Assessment (TA) which bring into question the validity of the TA underpinning the DCO application. NWP is currently discussing these concerns with HNP and reserves the right to comment further in due course. These concerns relate to the following:

- Highway safety;
- Base data;
- The effect of National Grid;
- AIL's; and
- Other key concerns.

### Highway Safety

5.5 The effect of the development on highway safety is a key issue for NWP in terms of both the prevention and treatment of accidents that occur on the local and strategic network. Maintaining the free flow of traffic on the local / strategic roads and junctions is fundamental to this and the ability the network to accommodate material increases in traffic should not be overlooked.

5.6 In this respect, NWP considers that the DCO application is flawed in a number of areas relating to accident analysis and forecasting, journey time assessment, driver stress and junction / link modelling.

### *Accident analysis*

5.7 The accident analysis within the TA has concluded that there are various Personal Injury Accident cluster spots on the local and strategic highway network relevant to the

<sup>10</sup> Document References APP-212 (Part 1 of 2) and APP-213 (Part 2 of 2)

proposed application. Notably the analysis covers the period 2011-2015 and is already 3 years out of date. This analysis should be brought up to date using accident statistics from 2015 onwards to provide a valid assessment of accidents trends and the baseline position.

- 5.8 The analysis concludes that there is forecast to be a 4% increase in accidents on the A55 between junctions 3-8 and up to 26% increase on the A5025 at Valley for example.
- 5.9 The analysis states that an increase in magnitude of accidents such as this is considered to be 'negligible' (in accordance with the definition of negligible provided in the submitted ES) and hence no mitigation is proposed. Whilst an impact of less than 30% is defined as negligible in the submitted ES, we cannot agree that a 26% increase can be viewed as negligible from a transport assessment perspective.
- 5.10 However, in the context of what is proposed in terms of an exponential increase in HGV movements over a period of 9 years and the highway capacity issues which already exist (see paragraphs 5.11 to 1.1), this is considered to be a significant oversight. The additional number of large, slow moving junctions passing through the network should not be underestimated in the context of the additional highway risk that they pose in terms of worsening congestion, driver risk / frustration and the increased propensity for overtaking / hazardous manoeuvres.
- 5.11 Moreover, the accident analysis does not include an assessment of 'shunt type' accidents on the network which equally have the ability to significantly increase pressure and reduce resilience on the local / strategic highway network. This is particularly true at existing pinch points on the network such as the Britannia Bridge and the A5025 where any type of accident has the potential to have significant adverse effects on the operation of the highway network. This needs to be explored further and whilst in the context of DfT guidance on TA's the assessment of personal injury accidents is standard, this is not a standard case. The propensity for increases in shunt type accidents through significant intensification of HGV and staff traffic should not be underestimated in the context of a bridge between the island and the mainland. The number of instances that the Bridge have been closed / congested should be explored with analysis of the effect of additional demand.

#### *Junction Capacity / Modelling*

- 5.12 The junction modelling undertaken at numerous junctions on the local and strategic network identifies several junctions where serious capacity issues already exist and yet the TA proposes no mitigation.
- 5.13 Increases in congestion at various junctions / links on the local / strategic highway network arising from the proposed development and specifically from a significant increase in large, slow moving vehicles will add to driver delay and stress and encourage drivers to take unnecessary risks to the detriment of highway safety.
- 5.14 An example includes the assessment at A55 junction 6 which in the development scenario will have a 63% increase in driver delay and is already significantly overcapacity with an RFC of 147%. The effect is classified as a medium magnitude of change and of moderate significance and various tables within the TA state no capacity issues.
- 5.15 There are numerous other examples where over capacity, delay and driver stress are simply overlooked such as junctions 8A / 9 of the A55.

5.16 In addition, the VISSIM model outputs appear to be incorrect particularly at the Britannia Bridge, a key pinch point within the strategic network, whereby the model is forecasting reduced journey times with the addition of development traffic. A full analysis of the VISSIM model, calibration, validation and outputs has not been undertaken at this stage.

*Marine Off-Loading Facility (MOLF)*

5.17 Whilst the TA states that the assessments have been based on a conservative estimate of 60% of materials being transported to site by the MOLF, sensitivity analysis should be undertaken to demonstrate the effect on the local / strategic network should this modal split of material imports not occur. This could have fundamental implications on network resilience and hence highway safety and consequently should be addressed as part of the application to provide a robust and meaningful assessment.

*Summary of highway safety*

5.18 The issues relating to highway safety question the validity of the assessments and transport strategy used to underpin the DCO application and hence NWP's ability to provide a strategy for resourcing and mitigation.

Traffic Data

5.19 The traffic data used to underpin the traffic modelling and assumptions in the TA consists of both Manual Traffic Counts and Automatic Counts.

5.20 However, the majority of the traffic data, particularly at the various junctions on the A55 dates back to 2014. Given the scale and complexity of the DCO application, it is surprising that the transport modelling is not informed by more recent traffic data.

5.21 In this respect, it is suggested that any conclusions derived from the modelling should be treated with caution until the base year position is updated with up-to-date traffic data. As such, the impact of the proposed development cannot be appraised with any certainty. Further information relating to the validity of the traffic data with reference to contemporary traffic data should be provided within the TA and the relevant capacity assessments, forecasts and traffic modelling validated against up-to-date traffic data.

*The effect of National Grid (North Wales Connection Project)*

5.22 The National Grid project is another Nationally Significant Infrastructure Project and hence also subject to a DCO application. It is referenced in the Wylfa TA as a 'dependant development expected to happen but still in the development phase'. A traffic assessment has also been produced (September 2018) to support this project.

5.23 Part of the traffic effect of the National Grid proposals is likely to comprise some 40 two-way HGV movements per hour, approximately half of the HGV traffic forecast from Wylfa, however the effect of National Grid traffic is simply dismissed as 'relatively small'.

5.24 The TA does not assess the effect of National Grid other than a small sensitivity test at the Britannia Bridge.

5.25 National Grid is a dependant development – i.e. development at Wylfa is inexplicably linked to the National Grid proposals. As such, Wylfa cannot occur without National Grid and hence the TA needs to account for the full impact of the National Grid proposals. This is a serious oversight and without this detailed analysis and mitigation on common routes such as A5025 Valley – Wylfa, A5- A55 junction 3, A5114 between A55 junction 6

and Llangefni Link and A55 Britannia Bridge, the TA underpinning the DCO cannot be considered to be robust.

*Abnormal Indivisible Loads (AILs)*

- 5.26 It is inevitable that a Project of this magnitude will give rise to materials transported to site on specialised, large vehicles or AILs.
- 5.27 The TA states that there will be some 1,150 AIL movements over the duration of the Project and that specifically almost half of these (500) will require specialised escort.
- 5.28 Significant traffic management will be required to accommodate these vehicles, particularly on parts of the network with pinch points and avoiding further restrictions relating to height and weight. Hence there is potential for significant adverse effect on local communities and network performance.
- 5.29 There is no assessment within the TA as to how these AILs will be managed on the network, no analysis of the pinch points and particularly the impact on the A5025 (prior to improvements) and hence the effect on driver delay, frustration, increased overtaking and accidents cannot be estimated. Again, this is of significant concern to NWP in terms of planning, resourcing and mitigating any future effects.

*Other Key Concerns*

- 5.30 Vectos has also raised numerous other issues within the TA and supporting documentation which require further explanation which are set out below.
- 5.31 Justification needs to be provided in relation to the strategy for locating the Logistics Centre and P&R at A55 junctions 2 and 4 respectively as both of these are key to the overall transport strategy and both have the ability to attract a significant quantum of traffic. Justification needs to be provided in a transport context for this decision.
- 5.32 For example, what is the rationale for locating the logistics centre at A55 junction 2 compared to junction 3? This means that for every HGV journey to the Project there is an additional 11-12km per vehicle in additional mileage with corresponding effects of congestion, noise and air quality issues.
- 5.33 Why has only one Park & Ride site been chosen to accommodate some 26% of the projected workforce living offsite given the dispersed and rural nature of the catchment area? For example, 1,600 workers (35%) living off site are stated not to use Park & Ride because of their location. It would therefore be more appropriate to have numerous, smaller Park & Ride sites to maximise the efficiency and to limit the amount of private vehicle mileage (and hence effect) for the Park & Ride strategy.

*Conclusion on Traffic & Transport*

- 5.34 The transportation strategy for the DCO application for Wylfa is complex, involves a number of high- level assumptions and unless managed correctly, has the ability to severely restrict the capacity of the existing local and strategic road network.
- 5.35 In turn, this Project has the potential to cause severe detrimental effect on the road network through a combination of significant amount of additional HGV movements and general traffic associated with 9,000 construction workers.
- 5.36 There are fundamental concerns relating to the validity of the TA ranging from base traffic data, traffic modelling, interpretation of accidents, lack of consideration of the National

Grid DCO project and ultimately, highway safety. These concerns have the ability to have a significant detrimental effect on the highway network in terms of highway safety and hence the resourcing required to mitigate and deal with incidents and effects from the development.

5.37 The concerns and issues relating to workforce transport set out in the foregoing paragraphs need to be explored and addressed in order to mitigate the effect of HGV and construction worker traffic on the local and strategic highway network to ensure that the risk to highway safety can be accurately assessed.

## **MOLF**

### *Lack of Information and Assessment*

5.38 NWP is concerned by a notable lack of detail contained within the DCO application documents relating to the operation of the MOLF during the construction period of the main site. A number of documents describe the development proposed and the functions of the various components of the MOLF; however, there is no detail, for the purposes of assessment, of the types of vessels that will use the MOLF, their loads, ports of origin, crew numbers, nationalities and any crew transfer arrangements that will need to be monitored. There is also a failure of the DCO application documents to acknowledge or address the potential for waterborne protest; despite the potential for such being acknowledged during pre-application discussions between HNP and NWP.

5.39 Ports Policing in North Wales is delivered through North Wales WECTU (Welsh Extremism and Counter Terrorism Unit). WECTU is a collaboration of the four Welsh Police Forces. The current North Wales WECTU has a limited capacity and is entirely committed to the two million plus annual passenger movements through Holyhead Port. There is not the capacity to take on significant extra duties without removing resources necessary to complete core duties. It should also be noted that NWP currently has no capability to police waterborne protest.

5.40 NWP expects to have a role in border security, and security more generally, in relation of the MOLF; but there are presently no proposals within the DCO for establishing an effective border security protocol and, therefore, it is impossible for NWP to assess the potential impact of the MOLF operations upon its resources.

5.41 HNP, as Harbour Authority, intends to establish a Local Port Service as a command and control centre for marine operations relating to vessel activity and on-the-water activity. HNP only goes as far as to describe the “potential” responsibilities of the Local Port Service, which potentially could include coordination of marine responses, coordination of emergency responses, closed-circuit television monitoring of the harbour area and being a point of contact for all harbour operations. NWP does not consider that this goes far enough and fails to address the concerns highlighted above and those raised previously at pre-application stage. As highlighted above, there is no mention within the DCO application documents of how, or whether, the Local Port Service will put in place the necessary contingencies to manage the threat of water borne protest. It is considered that this needs to be secured by way of requirement and an effective management strategy.

5.42 NWP considers the lack of information and subsequent lack of assessment relating to the aspects of the MOLF operation that will potentially impact upon NWP resources, to be a significant failure of the DCO application. For this reason, the appended PIA does not currently include any mitigation measures, including additional resources needed, that may be required by NWP as a direct result of the MOLF operations. This will need to be

subject to further discussion and agreement when more detailed information becomes available. In the absence of sufficient information being available, a plan needs to be secured, by way of requirement, that contains a list of measures requiring inclusion within that plan. Such a plan would need the approval of NWP.

#### Absence of Contingencies

5.43 The MOLF facility, when constructed, is intended to handle a significant number of imports linked to the construction of the main power station. The facility will operate 24 hours a day on 365 days of the year over what appears to be a circa 78-month (6.5 year) period. It is part of the “Key Mitigation” against the Project’s impacts and is anticipated to be operational from the start of year three of the construction period. The scale and importance of this Key Mitigation is considerable in light of HNP’s commitment to a minimum of 60% of bulk deliveries and AILs arriving via the MOLF; although HNP is actually targeting 80%. It is acknowledged that this represents a significant number of equivalent deliveries by road; but as a consequence, it is essential that robust contingencies are developed and put in place to deal with the potential for the disabling of the MOLF, whether by virtue of waterborne protest, prolonged adverse weather, storm damage, or an eventuality that would see the construction of the MOLF delayed.

5.44 Furthermore, NWP is aware that in the case of Hinkley Point C, a number of AILs that were intended to be delivered to a similar MOLF were proven to be too heavy, and therefore had to be delivered by road. As far as NWP can ascertain, the DCO application documents do not contain an assessment of the potential impact of the scenarios highlighted above, or at least, as a minimum, set out a structure for an appropriate level of contingency planning when further details of the MOLFs operation are known.

5.45 In light of the lack of detail provided in the application, NWP is of the view that this issue requires careful consideration and assessment by the ExA as a principle issue. In addition, NWP considers, as with protest and safety of the MOLF, that construction traffic management, through the Code of Construction Practice and Construction Traffic Management Strategy, needs to capture and secure how contingency planning will take place. In addition, NWP expect some form of assessment of a realistic worst-case scenario of disabling of the MOLF to be undertaken.

5.46 The non-material changes proposed at Deadline 1 may have an impact on the operation of the MOLF and the proportion of bulky materials delivered to the main site via that means. Whilst it is acknowledged that an increased use of the MOLF would potentially reduce highway capacity impacts, in light of Vectos’ view that the highways impacts of the proposed development have been underestimated by the applicant, it is considered that a detailed assessment should be requested by the ExA to demonstrate the reduction in impact that could be achieved through the proposed non-material amendment. This will be critical if any short-comings in the submitted TA are uncovered as part of the Examination process.

#### **Protest**

5.47 It is expected that the Project will attract protest activity from both local and international Groups. Facilitating the right to peaceful protest, keeping roads and highways open, protecting the public and preventing crimes occurring are all the responsibility of the police. This issue was raised consistently by NWP through the PAC process.

5.48 The experience from other nationally significant developments has shown that should protests occur and become protracted, the resulting impact on both the local police and bordering forces can be extremely detrimental both in terms of resourcing and finance –

these impacts are a direct consequence of the development proposed. Although Hinkley Point C has seen limited protest activity to date, Avon and Somerset Constabulary believe this will change during critical build stages. A further example of protracted protest associated with an infrastructure project is that experienced in respect of fracking proposals at Preston New Road in Lancashire, where the burden upon police resources is understood to have been considerable.

- 5.49 If protest (lawful or unlawful) occurs against the development, NWP could see an unsustainable increase in demand for its resources. Consideration needs to be given to the recruitment and retention of additional specialist skilled officers to support any protest activity. NWP does not have a marine capability to deal with protestor action at sea or within the coastal waters, as highlighted above.
- 5.50 Long term protracted protests would place a significant burden on NWP, taking resources away from every day policing to the potential detriment of the service it provides to the communities of North Wales. NWP would not be able to sustain such resource pressures for any period without the assistance of mutual aid, which places an additional significant increase in the cost for policing any protests.
- 5.51 Consideration will need to be given to this area of policing and a separate agreement as to how best to mitigate this is being sought with HNP. It is strongly requested that the ExA gives careful consideration to the issue of potential protest.

### **Cumulative Assessment**

- 5.52 The North Wales Connection DCO application was submitted to the Planning Inspectorate by National Grid Electricity Transmission PLC (National Grid) on 7 September 2018 and was accepted for Examination on 4 October 2018. It has been known for some time that both the North Wales Connection and Wylfa Newydd DCO applications were likely to run broadly in parallel, then consequently the construction of the two developments, given their interdependency. As such, they cannot be assessed in isolation; it is essential that the cumulative, combined impacts of the developments are thoroughly understood and assessed.
- 5.53 NWP considers that the construction periods of the two projects will have the greatest impacts on its resources. For example, when North Wales Connection construction activity is at its peak, in terms of construction workers (approximately 1,200)<sup>11</sup>, when HNP expect to see construction workers at 5,000<sup>12</sup>. This means that the movement of workers and construction traffic on the road network will be significant, likewise the demand for accommodation and related services on the island. There are a number of impacts that consequently require cumulative assessment.
- 5.54 An initial assessment of the Wylfa Newydd TA undertaken by Vectos, referenced above, has highlighted potentially serious flaws in a number of areas, one of which is cumulative assessment of the combined impact of the development with the North Wales Connection. By way of an example, and as highlighted above, a review of the Traffic Assessment prepared in support of the North Wales Connection reveals that National Grid's proposals are likely to generate 40 two-way HGV trips per hour, which is approximately half of the HGV trips expected to be generated by HNP's proposals. Notwithstanding this 50% uplift in overall HGV trips associated with this cumulative proposal, HNP's TA simply dismisses the likely impact as 'relatively small'. Furthermore,

<sup>11</sup> Image 4.2, ES Chapter 4, North Grid Connection DCO application

<sup>12</sup> Figure A2-7, 6.1.2-ES Volume A

HNPs TA fails to assess the impact of the North Wales Connection development traffic other than in one small sensitivity test at the Britannia Bridge.

- 5.55 Without undertaking a thorough assessment of the cumulative impact of development traffic on commonly used routes, it is impossible to conclude that any proposed mitigations measures are sufficient to address the impact of the development. Consequently, the TA cannot be considered robust.
- 5.56 A further cumulative impact that is not assessed within the DCO application documents is protest. Both the Project and the North Wales Connection development have the potential to attract protest activity at a similar point in time, given the intention for construction works to commence concurrently. A full cumulative assessment needs to be undertaken and, when doing so, the implications of this in respect of potential disruption to traffic routes and upon police resourcing needs to be included within this.

### **Socio-economic impacts**

#### ***Increase in Reported Incidents and Crime***

- 5.57 NWP expect significant socio-economic impacts to arise from the development that will require mitigation. A number of these impacts will have direct implications for NWP. In particular, the significant increase in workforce population will impact upon the general policing of the area and upon community safety as a result in the potential increase in reported incidents and crime.
- 5.58 In Wales, there is a strong positive correlation between population and reported incidents of crime; meaning that areas with larger populations experience more reported incidents and crime.
- 5.59 Appendix A of the PIA, (Appendix 3 of these representations) calculates how the increase in local population arising from the construction period of the development, up to the peak worker scenario, will impact upon crime rates in the area and, consequently, upon NWP demand for resources arising from the development. Two models are used for this purpose, a Crime Model (uses the relationship between the number of crimes and population levels to provide an estimate of expected increase in reported crime as a result of the increase in population) and an Incident Model (uses the relationship between the number of incidents and population levels to provide an estimate of the expected increase in reported incidents as a result of the increase in population).
- 5.60 The output of the Models, based on the principle that an increase in population results in an increase in reported incidents and crime, show that the estimated population increase of 7,000 at the point of the peak worker scenario in 2023, as defined by HNP<sup>13</sup>, is likely to result in a 7.8% increase in crime and a 6.1% increase in reported incidents within the Key socio-economic study area (KSA). This output has been fed into a Resource Allocation Model to determine the additional resources that will be required by NWP to maintain adequate policing.
- 5.61 As a consequence of the above conclusions NWP, fundamentally disagrees with the estimate by HNP that the increase in workforce population as a consequence of the development will amount to only a 0.5% increase in incidents of crime<sup>14</sup>. It is not clear how this predicted increase has been calculated, having regard to both crime rate and reported incidents; it is simply reported as “incidents”. It is observed that the predicted crime effects within the ES are expressed as an impact upon the ‘north Wales

<sup>13</sup> Paragraph 1.5.63, 6.3.1-ES Volume C1 – Project-wide effects

<sup>14</sup> Paragraph 1.5.64, 6.3.1-ES Volume C1 – Project-wide effects

constabulary area'. This is inappropriate. The impact upon the KSA is the most appropriate measure, otherwise the correlation between the population increase in the KSA and impact upon crime in the KSA is ignored, to the detriment of the assessment. The conclusion that the impact of the development upon demand for police services is 'negligible'<sup>15</sup>, is therefore based on an inappropriate assessment and is unjustified. It runs contrary to NWP's own assessment, which in contrast is considered to be robust.

5.62 NWP wishes to highlight that its own assessment predicts reported incident and crime increases based on a general increase in population of the magnitude stated. It does not, for example, have regard to a more accurate assessment of the make-up of the HNP transient workforce population. It does not take account of the following:

- the increase from a largely male dominant workforce (HNP predicts an average workforce age of 35-49 years) without any direct family ties or supervision in the area;
- the normally higher than average levels of foreign workers creating implications for highway code knowledge, language barriers and cultural differences; and
- increases in impacts upon the night-time economy due to a mainly single, male dominated population.

5.63 If regard is to be had to the above additional factors, NWP considers its own assumptions on the resultant increase in reported incidents and crime to be conservative; however, in the absence of an appropriate, reliable evidence base that would accurately pay regard to these additional factors, NWP submits that the appropriate conclusion is that the development would see a minimum increase in crime of 7.8% and an increase in reported incidents of 6.1%. Given the significant variance in conclusions between NWP and HNP, it cannot be concluded that the ES has appropriately assessed the impact of the development upon the demand for police services.

5.64 There are of course additional impacts arising from the development, such as those linked to roads policing and protest, which will have an impact upon police service demand. These are discussed elsewhere in these representations and the appended PIA.

### ***Proposed Mitigation***

5.65 HNP proposes various means of mitigation to address the potential for harmful socio-economic effects. One such form of mitigation is the Workforce Management Strategy (WMS). The WMS sets out the principles that will inform the development of the Code of Conduct, which will guide workforce conduct and behaviours during the construction of the Project. NWP welcomes HNP's commitment to the Code of Conduct, however NWP must be involved in its evolution and monitoring mechanisms. Whilst NWP accepts that the WMS principles are the basis for the Code of Conduct, and should not therefore be treated as final, it is also noted with some concern that many of the expected requirements are cited as a 'should', rather than a 'must'. For example, it is stated that:

'All personnel *should* provide information on selected accommodation choices when requested for data collection purposes'<sup>16</sup>. (*emphasis added*)

And:

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<sup>15</sup> Paragraph 1.5.66, 6.3.1-ES Volume C1 – Project-wide effects

<sup>16</sup> 8<sup>th</sup> bullet, paragraph 2.2.1, 8.5-Workforce Management Strategy

*'Supervisors should make personnel aware of any shortcomings in their conduct and wherever possible seek to address the as soon as possible.'*<sup>17</sup> (emphasis added)

5.66 In respect of these two examples, NWP considers that each requirement is essential and therefore is a 'must'. It is essential that workforce accommodation choices are accurately recorded and monitored in order to ensure that the predicted effects of the proposed development, as presented in the DCO application, are accurate and that any changes to the predicted accommodated choices and take-up can be the subject of further mitigation where necessary. It is also essential that any inappropriate conduct is highlighted and addressed as soon as possible. The above represent examples but reflect the fact that the Code of Conduct needs to be a robust and clear document leaving no ambiguity in relation to the expectations for workers conduct and the related actions of those in the role of enforcement.

5.67 NWP considers there to be a general lack of mitigation proposed if certain expectations are not borne out. For example, what should happen if the predicted split in workforce accommodation between the site campus and elsewhere should not come to fruition? There will clearly be implications for community cohesion and related impacts in the event that the take-up of accommodation at the Site Campus is not as predicated. How will the WMS and Workforce Accommodation Strategy (WAS) address such variances and mitigate accordingly? This is an important matter that the ES fails to mitigate against as far as NWP can ascertain.

5.68 NWP welcomes references within the DCO application to the acknowledgement of the potential impacts upon vulnerable groups. Throughout its PAC responses, NWP has highlighted the need for appropriate community safeguarding measures and mitigation in order to address the anticipated impacts of the development. NWP therefore wishes to emphasise the importance of its inclusion and involvement in the various working groups that HNP intends to establish, such as that tasked with coordinating measures appropriate to avoid risks to vulnerable groups<sup>18</sup>.

5.69 HNP references a Community Impact Fund. It is stated that the fund will have a number of functions, including '*for unforeseen effects arising as a result of the presence of the workforce in the area, including effects on people/groups with protected characteristics*'<sup>19</sup>. At this stage the intended use and qualifying criteria for this fund is not clear. Given the potential for this fund to be used to offset the impact of the development upon community groups, NWP submits that it needs to be involved in agreeing the terms for the fund and its mechanisms for appropriate allocation.

5.70 Notwithstanding this, NWP seeks further clarity in relation to the intention of the Community Impact Fund. A key question is whether the Fund is to be designed to bridge any gaps the resources of public services, such as community policing, where further unanticipated impacts arise during construction. Or, alternatively, whether such matters will instead be the subject of a separate contingency fund for emergency services, as set out elsewhere in NWP's submissions concerning the Section 106 Agreement Heads of Terms. The DCO application must make explicitly clear what the Community Impact Fund can be utilised for, beyond the broad statements such as that referenced above, and what the related qualifying criteria will be. If the Community Impact Fund is being relied upon by HNP as a form of mitigation against the impacts of the Project, its role,

<sup>17</sup> 4<sup>th</sup> bullet, paragraph 2.3.1, 8.5-Workforce Management Strategy

<sup>18</sup> Table B2-9, 6.2.2-ES Volume B – Introduction to the environmental assessments B2-Socio economics

<sup>19</sup> Paragraph 1.8.18, 6.3.1-ES Volume C – Project-wide effects C1 – Socio-economics

function and qualifying criteria must be secured in the DCO; otherwise it cannot be regarded as meaningful mitigation.

5.71 NWP identifies above a range of concerns and issues for the ExA to consider in relation to the socio-economic impact of the Project. The workforce population will impact upon reported incidents and crime in the area, which will impact significantly upon NWP resources and will necessitate a range of further appropriately robust mitigation measures that will require NWP involvement moving forward.

## 6 PLANS ACCOMPANYING THE DCO

### Introduction

6.1 The DCO is accompanied by a series of plans and strategies that set out how the construction and operation of the proposed Wylfa Newydd Nuclear Power station will be managed and controlled to ensure that the mitigation commitments of the Project are delivered. The representations set out in this section first relate to the submitted Code of Construction Practice (CoCP) (Ref: APP-414), and then present NWP's representations on the other plans and strategies that accompany the DCO.

### Code of Construction Practice

6.2 The CoCP and the sub-CoCPs are defined as 'control documents' within the 'Guide to the Application' (Rev 2.0) (Ref: REP1-002). The sub-CoCPs relate to the Main Site, Marine Works, Off-site Power station Facilities, the Logistics Centre, the Park and Ride Facility and the A5025 Offline Highway Improvements. The documents are arranged around a number of over-arching topic areas, of which general site management, traffic and transport and public access are of particular relevance to the operations and duties of NWP. It is noted that the CoCP and the sub-CoCPs are in accordance with the mitigation described in the submitted ES.

6.3 In overall terms, the CoCP as currently drafted does not contain sufficient detail to be regarded as a final version. Further engagement with stakeholders including the emergency services is required before the document can be agreed. This could potentially be secured through approval by requirement.

6.4 The CoCP and the accompanying sub-CoCPs will support the planning and delivery of the Project. The CoCP is intended to take the role of an overarching document which sets out project-wide construction management strategies for the site with the sub-CoCPs providing additional controls that are location specific. As such, it is logical to assume that the sub-CoCPs would flow from, and be in accordance with, the overarching CoCP. This is not, however, the case as para. 1.3.4 states:

*"In the event of a conflict between the CoCP, the controls set out in the sub-CoCP will prevail."*

6.5 It is NWP's view that the CoCP should have priority and the sub-CoCPs should be in accordance with that document. If this is not secured, then the status of the CoCP is weakened. A clear hierarchy is required for the plans and strategies intended to control the development and ensure the required mitigation is implemented – this hierarchy is currently absent.

6.6 The delivery of the standards and controls contained in the CoCP and sub-CoCPs will be secured through Construction Environmental Management Plans (CEMPs). The application contains very little detail on the approval mechanism for CEMPs other than to state that contractors will be contractually required to prepare a CEMP that is in accordance with the CoCPs. However, there does not appear to be any contingency in place to ensure this contractual obligation is maintained if the development is transferred from HNP's ownership in the future.

6.7 Whilst it is noted that HNP is seeking the ability, through a tailpiece on requirement PW7, to amend the CoCP in the future, it is NWP's view that the CoCP (and the sub-CoCPs) should be subject to requirements requiring the formal sign-off of these documents by IACC, and other interested and relevant stakeholders including NWP, prior to the commencement of development. This approach would obviate the need for a tailpiece.

Programme Board & Engagement Sub-Groups

- 6.8 The CoCP submitted with the Application proposes the establishment of a Programme Board with responsibility for monitoring the progress made under the topic areas identified in Figure 3-1 of the CoCP, and for determining whether additional mitigation is required. The Board will also have responsibility for the oversight of funding from the Section 106 Agreement.
- 6.9 The Board is proposed to include representatives from HNP, IACC, the Welsh Government, NRW and the Emergency Services. However, at Deadline 1, HNP submitted a document titled "*Development Consent Order Section 106 Agreement Status Note*" (Revision 1.0) (Ref:REP1-010) which proposed a change to the composition and structure of the Programme Board and it being renamed as the "Wylfa Newydd Major Permissions Oversight Panel" or "WNMPOP". It should be noted that NRW and the Emergency Services are no longer represented in the WNMPOP, which NWP do not agree is appropriate, for the reasons set out further below. Instead, the WNMPOP is proposed to comprise representatives from:
  - IACC;
  - Community Liaison Group;
  - Welsh Government; and
  - Horizon Nuclear Power
- 6.10 HNP proposes that the Programme Board / WNMPOP will facilitate the distribution of the contingency funds identified in the Section 106 Agreement.
- 6.11 It is understood that should the WNMPOP approach be taken forward by the Applicant, then an updated CoCP will need to be submitted to the Examination as the WNMPOP will replace the Programme Board detailed in paras. 3.2.5 – 3.2.9 of the submitted CoCP. The submitted CoCP includes the emergency services and NRW as part of the Programme Board – this is an approach that NWP firmly submits should be replicated in the WNMPOP.
- 6.12 NWP further consider that there is a clear conflict of interest if HNP can act as the decision-maker in relation to the release and targeting of certain contingency funds to be secured through the DCO section106 agreement. In addition, as HNP is a special purpose vehicle, no detail has been provided on future administration and governance should HNP relinquish its role in the Project.
- 6.13 The status note proposes that other parties (such as NRW, the emergency services, and Betsi Cadwaladr University Health Board) could be invited to WNMPOP discussions as required. Such a mechanism leaves control of the approval of plans entirely within the gift of WNMPOP and does not ensure that key statutory bodies have the necessary control and input into plans that is clearly required. Such parties, which includes the emergency services, should be identified at the outset and any parties with an interest in the Section 106 Agreement (i.e. for whom mitigation or monies are secured) should be represented on WNMPOP.
- 6.14 HNP proposes that the WNMPOP would have eight topic focused sub-groups that report to it on planning-related matters. These sub-groups would focus on issues at a more detailed level and recommend specific mitigation proposals to the WNMPOP. The WNMPOP would then consider mitigation proposals and appropriate direction. As stated earlier, NWP believes that an ESEG should be established which has a role across a number of topic areas. It is also critical that a representative of that group is included within WNMPOP. NWP is able to work with HNP to establish the membership,

constitution, scope and role of the ESEG prior to the close of the Examination. Further details are set out in the Section 106 Heads of Terms (Appendix 4) .

- 6.15 It is considered that if the panel approach is to be adopted, then the role, structure, governance and operation of the panel could be established through an article in the DCO. This was the approach taken in the confirmed Silvertown Tunnel DCO (Ref TR010021) under Article 66 in respect of the Silvertown Tunnel Implementation Group (STIG) – a consultative body established in relation to the implementation of the mitigation and monitoring strategy, initial bus services and the charging policy for the tunnel.
- 6.16 Further detail on the proposed governance structure, and a specific article in the DCO to secure this, must be sought from HNP by the ExA in order to consider the effectiveness of the panel proposed. Without this, the ability of the panel to ensure the delivery of adequate mitigation is questionable. Such further detail can be delivered through the Section 106 Agreement or secured through a requirement in the DCO.
- 6.17 It is understood that HNP is undertaking further work on governance of the WNMPOP, including making proposals regarding the appointment of a chair. All parties with an interest in the Section 106 Agreement should be involved in these discussions, not just the Welsh Government and IACC. NWP has not been party to any discussion around the structure, governance or membership of the Programme Board (or WNMPOP) and sub groups, and nor has NWP been party to any discussions on the change to its structure proposed at Deadline 1. NWP has raised concerns regarding membership and the lack of detail or consultation particularly with regard to governance and mechanisms including dispute resolution and decision processes through the Team Wales group<sup>20</sup>. Detailed discussions on the topic would be welcomed as, at present, NWP does not consider that the proposed structure is suitable to meet its needs or to ensure that the impacts of the development are adequately managed.
- 6.18 It remains the view of NWP, that the Emergency Services should be represented on the Programme Board / WNMPOP. It is also noted that IACC agrees with this position as set out in its written submissions (Ref:REP1-018) on page 12 and 13, which states, "*It is proposed that membership of that Oversight Panel should consist of HNP, the Council, Welsh Government, Natural Resources Wales and the Emergency Services.*"
- 6.19 Alongside the Programme Board, it is proposed that a number of topic specific engagement sub-groups will be formed (with membership to be agreed by the Programme Board). The sub-groups will be responsible for making recommendations to the Programme Board on monitoring and reporting with their specific topic areas. Of the topic areas identified in the CoCP, a number will have a potential impact on NWP's operations and duties. These include socio-economic effects, community safety and management, the construction worker code of conduct and traffic and transport.
- 6.20 In light of the fact that the Emergency Services can make an important contribution to the preparation of a number of plans and strategies across different topic areas, NWP considers that it is insufficient to have an 'emergency services engagement sub-group' with the remit outlined in the CoCP. NWP would propose the establishment of an ESEG that operates across relevant topic areas (which can be agreed with HNP). A similar approach has been taken at Hinkley Point C. This group could act as:

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<sup>20</sup> Team Wales Group – attendees include IACC, WAG, Gwynedd Council, Conwy Council, BCHUB, NWFRS, WAST, NWP, Public Health Wales. HNP attend for specific agenda items by request.

- i. a consultee to HNP across a number of the required plans and strategies to varying degrees (i.e. in relation to those topic areas which the emergency services are either most qualified to advise or which impact upon their operational duties);
- ii. a named consultee to the IACC in the discharge of requirements relating to the approval of plans and strategies; and
- iii. the approving body for specific plans and strategies requiring pre-construction approval by requirement, e.g. the Community Safety Management Strategy.

6.21 A schedule of the plans and strategies that the ESEG could be involved with, and the scope of that involvement, is set out in Table [7-1] in section [7] of these representations. Further representations on the topic areas within the CoCP are set out below.

#### Socio-economic effects

6.22 The monitoring proposed in relation to the socio-economic impacts of the development will be undertaken by HNP and is focussed on the KSA. The data utilised will come from a number of sources external to HNP including IACC and the emergency services, as well as from HNP itself through the monitoring of its Worker Accommodation Management Strategy (WAMS). The WAMS will include an Oversight Board (HNP, IACC and Gwynedd CC), which will be a function of the Accommodation and Tourism Services engagement sub-group (of the CoCP).

6.23 The approach proposed requires detailed consideration by the ExA as it will create a governance structure where the Applicant has a role in the provision of data, and in the decision-making process (based on that data) to determine if mitigation is adequate and whether additional mitigation or Section 106 contributions are required. In NWP's view, this structure lacks sufficient independence to be effective.

#### Community Safety Management Strategy

6.24 As currently drafted, the CoCP proposes the development of a Community Safety Management Strategy (CSMS). The CSMS will be prepared collaboratively by a joint working group established by HNP – the CoCP states that this working group will include the Emergency Services Engagement Sub-Group. The sub-group will also act as the interface between the site and the emergency services and other bodies and parties (as set out under para. 3.4.9 of the CoCP). The final CSMS is subject to approval by IACC under DCO requirement PW8.

6.25 Positively, at para 3.4.4 of the CoCP, HNP commit to contributing to the additional resourcing required to maintain community safety as a direct result of the Project through the Community Safety Contribution. This contribution will be secured by means of the Section 106 Agreement – NWP's representations on this are set out in section 8.

6.26 However, the approach proposed in the CoCP has not been subject to any detailed dialogue or liaison with the emergency services. Whilst NWP is seeking a central role in the approval of the CSMS, it is for HNP to prepare the strategy through consultation and engagement with the ESEG (in the form proposed by NWP).

6.27 It is noted that the CSMS will focus on an area extending to approximately 2.5km from the Wylfa Newydd Licensed Site Boundary (as illustrated in Figure 3-3 of the CoCP). However, given the likely geographical spread of the construction and operational workforce, this area is considered to be inadequate because it does not reflect the wider

area which could potentially be impacted upon by the proposals. NWP recommends that the extent of the area covered by the CSMS is reviewed in conjunction with NWP.

6.28 Para 3.4.20 of the CoCP states that "*The CSMS will set out the ways in which Horizon and the emergency services will work together to enforce the principles of the Workforce Code of Conduct, including implications on resourcing, joint ways of working and identifying key responsibilities of each organisation in relation to community safety.*"

6.29 To date, only limited discussion has taken place between HNP and NWP on either the CSMS or the Code of Conduct. NWP considers that the structure and proposed governance needs further work and should be refined by HNP in conjunction with the emergency services prior to the close of the Examination. In addition, the governance and function of the Programme Board / WNMPOP should be established through the DCO.

#### General Site Management Strategy

6.30 This section of the CoCP includes the Construction Worker Code of Conduct. Expected standards of behaviour are set out in the Workforce Management Strategy (Ref: APP-413). The WMS is clear that the Code of Conduct will be secured by a requirement in the DCO and will need to be approved prior to the commencement of construction. The code will need to be in accordance with the principles of the WMS.

6.31 The conduct principles set out in the WMS are supported by NWP. However, the submitted WMS is very much an outline document and NWP expects HNP to engage with NWP in the preparation of the Code of Conduct in respect of matters which relate to NWP's operational duties, for example, discriminatory behaviour, use of roads, and drug and alcohol use.

6.32 The CoCP also refers to the development of a Protest Management Strategy in consultation with NWP. A draft strategy, as far as NWP is aware, is yet to be prepared and it is unclear from the CoCP what status the Protest Management Strategy will have or where it will sit in the mitigation hierarchy once it has been developed.

6.33 It is acknowledged that the CoCP confirms that NWP is to be consulted on the development of the CSMS. NWP submit is should be the designated body for approving the CSMS and Code of Conduct. In accordance with NWP's vision (see para.2.4 of this document) its principle duty is community safety and therefore NWP is best placed to approve the contents as the document relates to safety and security. NWP should also be consulted by IACC before any subsequent changes are made to the CSMS or the Code of Conduct.

#### Traffic & Transport Management Strategy

6.34 The Traffic & Transport Management Strategy (TTMS) is set out in the CoCP and sub-CoCPs (which will also contain any site specific mitigation required). The strategy will provide specific controls and requirements in relation to the Logistics Centre, the Park and Ride facility, Abnormal Indivisible Loads (AILs) and the movement of people and freight. However, the detail provided within the CoCP is high level and will need refinement prior to the commencement of construction.

6.35 The TTMS refers to a Construction Traffic Management Strategy (CTMS) being provided to construction workers at their induction. However, the CoCP lacks any detail as to how this strategy will be prepared, approved, implemented and enforced.

6.36 NWP submit that detailed standalone Traffic Management Strategies need to be prepared in relation to both construction and operation of the Project.

6.37 With respect to freight movement, particularly via the MOLF, the CoCP lacks detail on how this will be controlled and what contingency measures will be put in place. NWP would expect both these matters to be covered by the CoCP or the CTMS. NWP will also expect to be consulted as the strategies are prepared, particularly in respect of contingency measures which HNP appear to want to limit to IACC and the Welsh Government (CoCP para. 5.4.14).

6.38 The CTMS should be subject to formal approval through a DCO requirement. NWP also considers that in the interests of transparency and clarity, HNP should be requested to submit an outline version for review to the Examination.

### **Other plans accompanying the DCO**

6.39 Aside from the CoCP, the construction and operation of the proposed development will be controlled by a series of plans and strategies. A number of these contain provisions that are of relevance to NWP, its operations and statutory duties – these plans of relevance are as follows:

<b>Plan / Strategy</b>	<b>Draft Currently submitted</b>	<b>Current Certified Document</b>	<b>Current DCO Requirement</b>
Wylfa Newydd Code of Operational Practice (Ref: APP-421)	Yes	Yes	WN10 OPSF4
Workforce Management Strategy (submitted in draft, Ref: APP-413)	Yes	Yes	No
Workforce Accommodation Strategy (Ref: APP-412)	Yes	No	No
Code of Conduct	No	No	PW8
Community Safety Management Strategy	No	No	PW11
Protest Management Strategy	No	No	No
Jobs and Skills Strategy	Yes	No	No

6.40 The above plans and strategies relate to the key matters of relevance to NWP in the delivery of its duties - transport, workforce and socio-economic effects. Notwithstanding the importance of these strategies to ensure the orderly and effective implementation of the Project and its required mitigation, only four of the documents have been submitted in draft as part of the application. It is NWP's view that a formal approval process is required for all the plans and strategies required to ensure the delivery of Project mitigation, which needs to be secured through DCO requirements.

6.41 NWP submit, given their role as being responsible for the safety of all communities in North Wales, they should approve have responsibility for approving the following documentation:

- Workforce Management Strategy;
- Workforce Accommodation Strategy;
- Code of Conduct;
- Community Safety Management Strategy; and

- Protest Management Strategy.

### **Additional plans requested by NWP**

6.42 In addition to the plans proposed by HNP, NWP submit that the following standalone plans should be prepared by HNP:

<b>Plan / Strategy</b>	<b>Reason plan is required</b>
Supplier Code of Conduct	<p>It is important to NWP that all of those working and operating on the Project within the local vicinity are bound by a Code of Conduct. This should include anyone contracted by HNP to undertake roles and responsibilities as part of the Project.</p> <p>The Code of Conduct is being prepared for personnel and employers. NWP wants to ensure that there is a section in the Code of Conduct which applies to suppliers, or that a standalone Supplier Code of Conduct is prepared.</p>
Health and Wellbeing Strategy	This strategy would secure the mitigation identified in the Health Impact Assessment. HNP is proposing this is secured through the Section 106 Agreement, however NWP submits it is more appropriate to set out the non-financial mitigation in a standalone health and wellbeing strategy.
Operational Travel Strategy	This strategy addresses increases in traffic associated with operation of the Project. Currently it is set out in the CoOP, however NWP considers these to be only outline principles and require a detailed strategy to be prepared. This is particularly considering a project of this size and scale should have in place a separate Operational Travel Strategy.
Nuclear Site Security Plan	NWP does not consider the CoCP to adequately address security controls for a nuclear site and expect a Nuclear Site Security Plan to be prepared prior to operation of the Main Site.
Construction Traffic Management Plan	As stated above the CoCP does not contain enough detail and a standalone detailed plan should be submitted prior to commencement of development
Operation Traffic Management Plan	The CoOP does not contain any detail on operational traffic management measures and, as such, a standalone detailed plan should be submitted prior to operating the Main Site.
Traffic Incident Management Plan	The CoCP refers to traffic incident management, however no plan is proposed to ensure that this is secured. It is imperative to ensure that appropriate management procedures are in place before HNP commence development. NWP would need to approve the details of such a plan.
MOLF Operational Plan	<p>Insufficient detail has been provided in relation to the operation of the MOLF and NWP requests that a MOLF Operational Plan is prepared and submitted to IACC for approval.</p> <p>This plan should set out the types of vessels that will use the MOLF, their loads, ports of origin, crew numbers, nationalities and any crew transfer arrangements that will</p>

Plan / Strategy	Reason plan is required
	<p>need to be monitored. It should also set out how the commitment to 60% - 80% of bulk deliveries and AILs arriving via the MOLF will be achieved, and include details of contingency measures should this not be possible. The plan should also set out how effective border security protocol will be delivered, and the measures to be put in place to address any incidents of waterborne protest. The responsibilities of the Local Port Service should also be established. The plan needs to be secured by way of a requirement that contains a list of measures requiring inclusion within that plan. Such a plan would need the approval of NWP.</p>

6.43 NWP's proposals with respect to how the DCO and Section 106 Agreement secure the plans required to control the proposed development is set out in Table 7-1. It is difficult for NWP to comment on plans that have yet to be drafted, and NWP would welcome the opportunity for further engagement with HNP in relation to these plans and strategies to determine in which plans NWP requires a role in their approval. If it affects NWP's ability to conduct its operations in some way, then approval of those plans will be required. Any such plans also need to be secured by way of requirement.

## 7 THE DEVELOPMENT CONSENT ORDER AND EXPLANATORY MEMORANDUM

7.1 As already stated, NWP has fundamental and unresolved concerns in relation to the increase in workforce and the impacts that will have on NWP, alongside the increase in construction road traffic. The ongoing management of these elements are critical to the operation and safety of the spaces the site and its impacts will occupy. As such, NWP needs to be involved in the drafting and agreement of the certain relevant requirements in the DCO and accompanying plans.

### Interaction of plans and DCO

7.2 At present, there are very few requirements contained within the DCO that relate to the production of plans. Most of the plans sit within the Code of Construction Practice (CoCP) and Code of Operational Practice (CoOP) which are certified documents. However, in the majority of other development consent orders, these plans are standalone documents prepared prior to commencing development in accordance with the principles in the CoCP. This is a large and complex infrastructure development, demanding proper control. NWP does not consider there is currently sufficient detail set out in the CoCP and CoOP to mean that a standalone plan is not necessary. Indeed, the Code of Construction Practice reads as an outline document only at present, lacking in proper detail in many important areas.

7.3 Table 7-1 below lists the plans that NWP needs to have some input into or involvement in. It also sets out how these plans are secured and whether the police wish to be consulted on the plan or approve the plan (or part of the plan) where relevant.

7.4 In relation to the Wylfa Newydd Code of Conduct, the Community Safety Management Strategy and the Protest Management Strategy, it is considered that NWP should be the primary body for approving these documents, as given their content relates to safety and security, they are best placed to confirm their acceptability.

7.5 In relation to the other non-certified plans, NWP should be consulted because there are parts of these plans which will be directly relevant to the statutory duties of NWP. NWP propose including a mechanism in the Section 106 Agreement which permits the ESEG to comment on and request changes to these additional plans.

7.6 In addition to the specific comments in Table 7-1, NWP has general concerns about Article 76, which provides for the certification of plans. There are a large number of plans that are listed as certified and therefore final. For example, the Workforce Management Strategy and the five sub-CoCPs. NWP submit that these plans need to be subject to further interrogation and approval and do not read as documentation in final form.

**Table 7-1 - Schedule of Plans & Strategies requiring NWP / ESEG involvement**

Plan	How is it secured?	NWP comment
Wylfa Newydd Code of Construction Practice	This plan is a certified document and compliance is secured through requirement PW7	This document is being certified in its final format, however NWP do not believe the document submitted as part of the application contains enough details to be a final document.
Wylfa Newydd Code of Operational Practice	This plan is a certified document and compliance is secured through requirement WN10	This document is being certified in its final format, however NWP does not believe the document submitted as part of the application contains enough details to be a final document.
Sub codes of Construction Practice for associated developments	These plans are certified documents and compliance is secured through requirements WN1, WN24, OPSF1, PR1, LC1 and OH1	This document is being certified in its final format, however NWP does not believe the documents submitted as part of the application contain enough details to be a final document.  There is also a concern regarding the wording of the requirements which state " <i>in the event of a conflict between the Wylfa Newydd CoCP and .... sub-CoCP, the ....sub-CoCP will prevail</i> ". It is not appropriate for a sub-CoCP to override the overarching CoCP.
Wylfa Newydd Code of Conduct	The production of this plan is secured by requirement PW8	The requirement does not provide for any body to approve this document as drafted.  NWP is best placed to approve the contents as the document relates to safety and security.  Therefore NWP ask that the requirement is amended so that NWP is the body who approves this document. This must be done within 2 months of receiving the draft document.

Plan	How is it secured?	NWP comment
Supplier Code of Conduct	The preparation of this strategy is not currently being proposed by HNP	As drafted the Wylfa Newydd Code of Conduct does not appear to apply to suppliers. It is imperative to NWP that the Wylfa Newydd Code of Conduct contains a section which applies to suppliers or that a standalone code of conduct is prepared for suppliers. If a separate plan is to be prepared, this should be secured by a requirement in the draft DCO.
Workforce Management Strategy	<p>This is a certified document, but there is no requirement to secure compliance with the strategy</p> <p>The mitigation table states that this is to be secured as a section 106 obligation</p>	<p>As compliance with other certified plans (e.g.: CoCP, CoOP) are secured in the DCO, a requirement should be included in the DCO requiring compliance with this strategy.</p> <p>NWP does not consider PW8 secures compliance with the Workforce Management Strategy as currently drafted.</p>
Workforce Accommodation Strategy	<p>This forms part of the application documents [Ref: APP-413], but is not a certified document</p> <p>The mitigation table states that this is to be secured as a section 106 obligation and the document itself states "although the Workforce Accommodation Strategy is not a certified document, the measures within it will be secured through the other mechanisms. For example, the Housing Fund and the Workforce Accommodation Management Service will be secured through a section 106 obligation. In addition the requirement to use the WAMS will be secured through the Code of Conduct contained in the Workforce Management Strategy, which is secured by a DCO requirement in the draft Order"</p>	<p>NWP's position is that this document should be certified, and compliance secured by a requirement in the DCO.</p> <p>NWP has no objection to the WAMS and the Housing Fund being secured through a Section 106 obligation, but the heads of terms prepared by HNP do not contain enough detail and NWP has seen a copy of the draft agreement.</p>

Plan	How is it secured?	NWP comment
Workers Accommodation Portal	This is to be operated by the Workforce Accommodation Management Service, which is to be secured as a section 106 obligation	<p>The mechanism for establishing and operating the Workers Accommodation Portal should be set out in the Section 106 Agreement.</p> <p>NWP consider the portal to be an important tool for monitoring the workforce population.</p>
Community Safety Management Strategy	The production of this plan is secured by requirement PW11. It must be submitted prior to commencing development	<p>NWP is best placed to approve the contents as the document relates to safety and security.</p> <p>Therefore NWP asks that the requirement is amended so that NWP is the body who approves this document. This must be done within 2 months of receiving the draft document</p>
Health & Wellbeing Strategy	The preparation of this strategy is not currently being proposed by HNP	<p>A requirement should be included within the DCO to submit this strategy and to secure compliance with the strategy.</p> <p>As set out above NWP proposes to include a mechanism in the Section 106 Agreement which permits the ESEG to comment on and request changes to this strategy.</p>
Operational Travel Strategy	This strategy forms part of the CoOP and therefore compliance is secured through requirement WN10	<p>The detail set out in the CoOP is inadequate and a separate detailed Operational Strategy should be prepared prior to "operation of the power station" which accords with the principles in the CoOP. There should be a requirement in the DCO to submit a standalone strategy and to secure compliance with the strategy.</p> <p>As set out above NWP proposes to include a mechanism in the Section 106 Agreement which</p>

Plan	How is it secured?	NWP comment
		permits the ESEG to comment on and request changes to this strategy,
Nuclear Site Security Plan	<p>The preparation of this strategy is not currently being proposed by HNP</p> <p>The CoCP addresses security principles at paragraph 4.7, but there is no reference to preparing a specific plan or strategy</p>	<p>A requirement should be included in the DCO which ensures a Nuclear Site Security Plan is prepared in line with the principles in the CoCP and submitted to IACC and NWP for approval.</p> <p>NWP is best placed to approve the contents as the document relates to safety and security and ask that the requirement is drafted so that NWP is the body who approves this document. This must be done within 2 months of receiving the draft document.</p>
Protest Management Strategy	This plan is referred to in the CoCP, but is not secured	<p>A requirement should be included in the DCO to submit to NWP for approval and to comply with this strategy</p> <p>NWP is best placed to approve the contents as the document relates to safety and security and ask that the requirement is drafted so that NWP is the body who approves this document. This must be done within 2 months of receiving the draft document.</p>
Job and Skills strategy	<p>This plan is an application document [Ref:APP-411] but is not certified. The strategy will be developed throughout the DCO examination and beyond.</p> <p>The mitigation table states that this is to be secured as a section 106 obligation</p>	<p>As the document is not in final form, there should be a requirement in the DCO to submit a strategy prior to commencing development and to provide annual updates throughout the construction period. The requirement should also secure compliance with this strategy.</p> <p>As set out above NWP propose to include a mechanism in the Section 106 Agreement which permits the ESEG to comment on and request changes to this strategy.</p>

Plan	How is it secured?	NWP comment
Traffic Incident Management Plan	Traffic Incident Management is discussed at paragraph 5.5 of the CoCP, however there is no proposal to prepare a plan or strategy	<p>There should be a requirement in the DCO to prepare a plan, submit this to IACC for approval and to comply with the plan.</p> <p>As set out above NWP proposes to include a mechanism in the Section 106 Agreement which permits the ESEG to comment on and request changes to this strategy.</p>
Construction Traffic Management Strategy	This strategy is set out in the CoCP and sub-CoCPs	<p>The CoCP does not contain enough detail. There should be a requirement in the DCO to submit a standalone Construction Traffic Management Strategy which accords with the principles in the CoCP prior to commencing development and to comply with this standalone strategy.</p> <p>NWP proposes to include a mechanism in the Section 106 Agreement which permits the ESEG to comment on and request changes to this strategy.</p>
Operation Traffic Management Strategy	This strategy is set out in the CoOP	<p>The CoOP does not contain enough detail. There should be a requirement in the DCO to submit a standalone Operation Traffic Management Strategy which accords with the principles in the CoOP prior to operation of the power station and to comply with this standalone strategy.</p> <p>NWP propose to include a mechanism in the Section 106 Agreement which permits the ESEG to comment on and request changes to this strategy.</p>
MOLF Operational Plan	The preparation of this plan is not currently proposed by HNP	A requirement should be included in the DCO to submit to NWP for approval and to comply with this strategy

<b>Plan</b>	<b>How is it secured?</b>	<b>NWP comment</b>
		NWP is best placed to approve the contents as the document relates to safety and security and ask that the requirement is drafted so that NWP is the body who approves this document. This must be undertaken within two months of receiving the draft document.

## Change management

7.7 Schedule 3(4) (Requirements) sets out a provision which permits subsequent amendments and revisions to certain documents, including the CoCP, CoOP, sub-CoCPs and Community Safety Management Strategy. These provisions do not require agreement by the discharging authority (IACC) except in relation to minor or immaterial changes or deviations where it has been demonstrated that the change does not give rise to any materially new or materially different environmental effects to those assessed in the ES.

7.8 In practice, this provision will make it difficult for NWP to keep track of changes to documents and to know which version HNP should be complying with. There is no provision for reporting on, monitoring and consulting on these changes. At the very least the Section 106 Agreement needs to set out a procedure for IACC to notify and consult the relevant groups (ESEG for NWP) on any changes to relevant plans.

7.9 Even if the changes permitted are non-material, the question of fairness must be addressed<sup>21</sup> and it is only fair that NWP is consulted on any changes which have an impact on NWP's statutory duties. The mechanisms set out in the draft DCO and Section 106 Agreement must provide procedural fairness and procedural transparency.

7.10 There is also a question as to whether this approach is lawful and despite the submissions made by HNP's Leading Counsel, NWP submit that there is a better way of dealing with such changes, see, for example, the drafting in The Millbrook Power (Gas Fired Power Station) Order.

## Scope of Environmental Assessment

7.11 NWP has several concerns with the extent of development authorised in the draft DCO in light of what has been assessed in the ES which are set out below:

- i. Schedule 1 (Authorised Development) sets out a very wide definition of associated development, particularly (c) "the construction and provision of building compounds, external building plant and equipment, stacks and chimneys, aerials and communication plant and equipment". NWP questions how this has been assessed and controlled through the Environmental Statement as it is not clear that this power as drafted falls within the remit of the Environmental Statement. There is also a caveat to widen the use of associated development at (o) "such other works as may be necessary or expedient for the purposes of or in connection with the construction, operation and maintenance of the authorised development which do not give rise to any materially new or materially different environmental effects from those assessed in the Environmental Statement", these works have not been fully and properly assessed and there is no requirement for IACC to approve these other works.
- ii. In relation to Schedule 3(4), NWP would like to know to what extent the requirements in the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (**EIA 2017 Regulations**) have been dealt with as part of this Project. The Scoping Report was prepared under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 and submitted in March 2016, an addendum was submitted on 4 May 2017 and the EIA 2017 Regulations came into force on 16 May 2017, on this basis the transitional provisions do apply. However, there have been numerous changes to the

<sup>21</sup> R (on the application of Holborn Studios Ltd) v Council of the London Borough of Hackney; R (on the application of Del Brenner) v Council of the London Borough of Hackney [2017] EWHC 2823 (Admin)

Project and NWP questions whether the project that was scoped is in fact the same as the project HNP is now seeking consent for. In any event, it is best practice to consider the requirements in the EIA 2017 Regulations even if the transitional provisions apply and promoters of development consent orders usually choose to comply voluntarily. Certain new topics in the EIA 2017 Regulations (Accidents and Disasters and Climate Change) are of particular relevance to this Project and NWP expects HNP to consider these topics.

- iii. Requirement PW2 (phasing of the authorised development) refers to the delivery of the key mitigation, which is the park and ride facility, the logistics centre, the A5025 Off-Line highway improvements, the MOLF, the ecological compensation sites, site campus, drainage works and landscape mounds within the order limits. However there is no requirement, which secures the delivery of the power station within the timeframes set out in the Environmental Statement. There must be certainty to ensure proper delivery of the Project in accordance with the worst case scenario assessed in the Environmental Statement. Delivery of the power station as set out in the Construction Method Statement and the Phasing Strategy must be included in the wording of requirement PW2 or set out as a separate requirement within the draft DCO.
- iv. Under Article 50, HNP is permitted to provide and operate such harbour facilities together with ancillary works to those facilities as many be necessary for construction, maintenance or operation, this is followed by a long list of subsidiary works. NWP's position is that any authorised works should be listed in Schedule 1 (Authorised Works) under the Marine Works packages (1E, 1F, 1G and 1H) and it is not appropriate to permit subsidiary works which fall outside authorised development in an article of the DCO. NWP also questions whether these works have been sufficiently assessed.
- v. It is noted that the ES is based on the assumption that 4000 workers will reside in the on-site campus and this assumption underpins the majority of the technical work undertaken, including the TA. However, the plans and strategies proposed to not identify any mechanisms to ensure that full occupancy is achieved, nor do they identify appropriate contingencies if, like Hinkley Point C, the onsite accommodation proves unpopular with the workforce.

### Other comments

7.12 NWP also makes representations on other specific elements of the draft DCO as follows:

- i. The extent of pre-commencement works in the definition of "commence" is very wide and includes works that may necessitate a number of transport movements, such as remedial works, erection of construction plant and equipment and erection of temporary buildings and structures. NWP is concerned with the impact of these pre-commencement works on the road network and suggest the definition is narrowed accordingly to exclude such pre-commencement works, or that a specific Construction Traffic and Transport Management Strategy must be prepared and approved before these types of pre-commencement works commence.
- ii. The definition of "maintain" is very wide, allowing full replacement of infrastructure. The amended DCO submitted at deadline 1 (Ref:REP1-005) includes the additional words relay, extend and enlarge. NWP needs to understand how this will be appropriately monitored by IACC, particularly if replacement of large pieces of infrastructure need to be replaced, in order to ensure that there is proactivity in

ensuring that new or materially different environmental effects do not result. It is also imperative to ensure that such types of "maintenance" have been properly assessed in the environmental statement and it is not clear at present whether this is indeed the case. For example, would an "extension" be defined to the parameters of the Rochdale envelope within the assessment that has taken place.

- iii. "Marine Off-Loading Facility" (**MOLF**) is only defined in relation to the works plan and is not given a full definition. It was described as a "small harbour" by HNP's Leading Counsel at the First DCO Issue Specific Hearing, however there is no further detail as to what the MOLF will actually constitute. As mentioned above in section 5, NWP has a particular concern regarding waterborne protests and how these will be managed. The DCO must properly control the construction and use of the MOLF. In addition, the MOLF's traffic from water to land must be fully controlled and the Examining Authority need to be satisfied that this has been properly assessed.
- iv. Article 11 (Power to alter layout, etc., of streets) permits street works "whether or not within the Order Limits". This is very wide and NWP questions whether this is proportionate. Whilst it is acknowledged street authority consent is required, ultimately a power this extensive does not seem to be relative to the powers that should be granted.
- v. In Article 61(2) (Byelaws), NWP would like the monitoring of loading/off-loading of the MOLF to be included, in order that those entering the land via the sea are monitored when they enter the main site.
- vi. WN27 (Operation and use of the Marine Off-Loading Facility) does not define the term "during construction". As drafted the requirement does not clarify whether 60% of all bulk materials required for construction should be delivered via the MOLF from day one and whether this could equate to more than 60% over the entirety of the construction period. In which case has this been fully assessed? NWP also notes there is no definition of "bulk material".
- vii. In relation to requirement SPC12 (Access), the gates must be set back a distance of 8 metres from the nearside edge of the adjoining carriageway with gates opening inwards.
- viii. NWP are not clear whether 8 metres is sufficient in order to allow safe access to the main site by all types of construction vehicles. An understanding is needed as to whether the gates will be in permanently open so that a relaxation on the set back will be permitted and, in any event, the assessment that has taken place in order to conclude that 8 metres is a suitable access length to the highway should be provided. At Schedule 18 (Procedure for approvals, consents and appeals) in relation to "Further information" 2(2) allows 7 business days to request further information. This is disproportionate, as is one business day for issuing a consultation response to a consultee.

## 8 SECTION 106 OBLIGATION

- 8.1 We have reviewed the Section 106 Agreement heads of terms proposed by HNP in the Development Consent Order Section 106 Agreement Status Note (Ref: REP1-010) submitted at Deadline 1. However, despite requesting the importance of being involved in the initial Section 106 Agreement review, and requesting sight of a copy of this document to HNP, NWP has not yet had sight of a draft agreement.
- 8.2 The only head of term that relates to the emergency services (fire, ambulance and police) is a financial obligation to make payments to the emergency services for resilience building. Not only is there no quantum attributed to these payments, the document contains no detail on a mechanism for how this payment would be made, to which parties and when. The lack of detail provided makes it difficult to determine whether this obligation meets the tests set out in Regulation 122 of the CIL Regulations 2010<sup>22</sup>, particularly whether it is fairly and reasonably related in scale and kind to the development.
- 8.3 Chapter C1 of the ES on socio-economics (Ref: APP-088) does recognise additional mitigation measures are required by the emergency services and that funding is required *"to offset additional costs resulting from the Wylfa Newydd Project workforce"...."it is expected that a package of additional funds would be agreed to enable adequate resources to be provided as required for emergency services. It is therefore expected that detailed service planning would be conducted to facilitate the identification of detailed criteria under which mitigation is requested and funds released."*
- 8.4 There is however no further reference to any form of mitigation, including in relation to traffic and transport impacts. The detailed criteria and mechanisms need to be secured within the Section 106 Agreement and this should have been set out in the heads of terms submitted by HNP.
- 8.5 We also note that contingency funds have been made available for health services, education services, transport services, accommodation provision and impact on tourism. However, there is no contingency fund proposed for the emergency services and the document does not set out any justification for why contingency funds will be made available for certain purposes, albeit not others.
- 8.6 There is no justifiable reason as to why a contingency fund should be made available for public services such as health, education and transport, however not explicitly for policing and fire and rescue services. Neither has HNP sought to provide any such reason as to why it is appropriate to include a specific range of contingency fund measures absent those areas of the community that may legitimately require it. Such a reference to all emergency services should be explicitly made, and drafted, into the Section 106 Agreement.

### NWP proposed heads of terms

- 8.7 Following the preparation and finalisation of the assessment of impact on NWP's resources – and absent any such detail being supplied by HNP - NWP has prepared a heads of terms, setting out the obligations that need to be secured in the Section 106 Agreement (**Appendix 4**), or via some other mechanism contained within the DCO.
- 8.8 NWP has used data in relation to socio-economic impacts and impacts on traffic and transport presented in the Environmental Statement and has applied the standard

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<sup>22</sup> Community Infrastructure Levy Regulations 2010

methodology used by the police force to assess the impacts on its resourcing in order to carry out a detailed Assessment<sup>23</sup> of the effect the Project will have on police demand.

- 8.9 This identifies a significant impact, particularly during construction of the Project (**Appendix 3**). The Assessment quantifies the potential financial mitigation that will be required and based on the findings in the Assessment, NWP is requesting a financial contribution of £13,825,000<sup>24</sup>. This sum excludes any costs associated with roads policing. At this time NWP is not ready to submit a detailed impact assessment relating to roads policing. We are working with our traffic consultants to examine in detail the traffic analysis and assumptions in the DCO application documents. Our concerns relating to the HNP traffic assessment are set out earlier in Section 5 of these representations.
- 8.10 The cost projections are based on the timelines provided by HNP and have been calculated over a period of ten years. The Assessment sets out a detailed breakdown of the additional resource required within each function of NWP each year throughout the construction period and also any capital expenditure which would be required as a result of the Project.
- 8.11 The trigger for the initial payment is the earlier of two years prior to commencing development and the date the DCO is granted. This is due to the two year lead in time for recruiting police resource. The payments are then allocated over the ten year period according to requirement. However, if there is a pause in construction work, HNP may apply to NWP to pause the payments, provided any costs in relation to maintaining increased resource are covered until the payments resume.
- 8.12 As part of the financial mitigation, NWP needs to provide additional facilities to accommodate the additional resource, therefore as a standalone contribution to construct the new police station has been included, which is payable upon completion of the Section 106 Agreement.
- 8.13 As the mitigation has been assessed based on the projected figures and timescales provided by HNP in its Environmental Statement, the Section 106 Agreement should contain a provision, which requires HNP to provide NWP with the monitoring data, which then allows NWP to review its own impact assessment. If the parameters (i.e. the number of workers) have increased or decreased, then this can effect a consequent change in the overall mitigation payments provided to NWP, if deemed necessary.
- 8.14 In addition to a financial contribution to mitigate known impact on NWP, the heads of terms set out the provision of a contingency fund for the emergency services to mitigate any unforeseen "one off" impacts, for example an unexpected large-scale road traffic accident, certain types of protests or an evacuation event. The administration procedures applicable to this contingency fund must be set out clearly, in order to ensure there is a robust set of criteria against which any request for funds can be considered. It is considered this is of benefit to all parties involved who apply for monies forming part of such a contingency fund, as it is imperative to ensure the mechanisms for requesting any future mitigation are robust.
- 8.15 Finally the CoCP does not adequately secure the formation of the ESEG. This should be secured through either a requirement in the DCO, or the Section 106 Agreement (the latter approach being used in Section 106 Agreement for Hinkley Point C (Nuclear Generating Station) Order 2013). Therefore the heads of terms include a requirement for HNP to establish an ESEG and provides that the group approve certain plans or the

<sup>23</sup> Wylfa Newydd Assessment of the Impact of Police Demand

<sup>24</sup> Based on 2018/19 costs. Subject to pay and non-inflation and any specific cost increases

relevant parts of certain plans. It also provides the right to request changes to certain plans throughout the construction and operation of the Project. In addition, the ESEG are to be notified of any application to the Community Impact Fund and have the right to consider the application and choose to determine any application to the Community Impact Fund for funding, which it believes affects or relates to community safety.

- 8.16 The requirements set out above are directly related to the Project and the impacts the Project will have on NWP and its ability to fulfil its statutory duties. The financial contribution is for cost recovery only, identified by the Impact Assessment, and is therefore fairly and reasonably related and scaled solely to the Project. On this basis NWP consider its heads of terms to set out legally robust planning obligations which meet the tests set out in Regulation 122 of the CIL Regulations 2010.
- 8.17 Given the quantum of the financial contribution required, NWP considers that it is necessary to be a signatory to the Section 106 Agreement. This will ensure there is a direct contractual relationship between NWP and HNP and allow NWP to monitor and enforce the relevant obligations directly as a contractual party. A more detailed note on this point is appended to this representation (**Appendix 5**).
- 8.18 NWP note the submissions made by IACC at the Issue Specific Hearing (1) on the proposed draft DCO on 24 October 2018 (Ref:REP1-018) regarding the CoCP, however disagree with the following statement at paragraph 7.4 "*however as the LPA are the only body who can enter a section 106 and enforce it as a deed, that cannot be subject to the COCP process as proposed*". It is correct to say that IACC are the only body entering into a deed that can enforce it as the relevant planning authority to which that land relates and we are not suggesting that this is usurped. However, NWP could enforce the obligations as a contractual party and in relation to (a) the approval of plans; and (b) contractual enforcement, it is considered that NWP require sufficient control to enforce these obligations directly.

### **Monitoring**

- 8.19 NWP have a specific concern with regard to monitoring and the provision of data by HNP and do not believe this is adequately addressed in the CoCP. Experiences from Hinkley Point C demonstrate that monitoring and change management are crucial tools for parties effected by a development of this nature, especially if there are applications for non-material changes during construction.
- 8.20 It is vital that NWP is provided with appropriate data, which is fit for purpose, to monitor impacts and ensure the mitigation in place is effective. Particularly given the possible consequences for NWP if the mitigation is inadequate. This is why a specific provision has been included in the heads of terms to ensure HNP is under a duty to provide adequate monitoring data to NWP. This provision benefits both parties as if the impacts on NWP are less than anticipated, accurate monitoring data will allow the assessment to be revised so that the financial mitigation is reduced.

## 9 CONCLUSIONS

9.1 NWP serves a population of 687,800 people covering the whole of North Wales including the counties of Isle of Anglesey, Gwynedd, Conwy, Denbighshire, Flintshire and Wrexham. Headquartered in Colwyn Bay, NWP has a staff of approximately 2,800. NWP is responsible for the provision of policing for and in the vicinity of the Wylfa Newydd Nuclear Power Station. If consented, proposed Project, along with the expected transient workforce during construction, will have a significant impact on the demand on police resources in the area and beyond.

9.2 In light of the potential impacts of the Project, NWP has continually engaged with the DCO process since 2014, is registered as an interested party and is participating in the Examination.

9.3 This document has set out NWP's response to the matters raised in the Examining Authority's Rule 8 letter and first written questions.

9.4 Overall, the impacts directly arising from the Project will result in a requirement for additional resources, staff and equipment and will place an additional financial burden on NWP's current restricted budget. The potential impact of the Project has been evidenced through a full and robust assessment that considers the challenges the development poses for NWP and seeks to establish and validate the potential mitigation implications for HNP. NWP has used data in relation to socio-economic impacts and impacts on traffic and transport presented in the Environmental Statement and has applied the standard methodology used by the police force to assess the impacts on its resourcing in order to carry out a detailed Assessment of the effect the Project will have on police demand. The assessment has identified a significant impact, particularly during construction of the Project, in relation to the following service areas:

- Local Policing Services - Response, Neighbourhood Policing Team and Local CID
- Custody
- Operational and Emergency Planning
- Road Policing Unit - RPU and Commercial Vehicle Unit
- Force Control Centre
- Managed Response Unit
- Investigation Support Unit
- Crime Services - All functions
- Administration of Justice
- Programme Management and Support

9.5 A copy of the resultant Police Impact Assessment report (PIA) is included in Appendix C. This identifies a significant impact, particularly during construction of the Project. The Assessment quantifies the potential financial mitigation that will be required and based on the findings in the Assessment, NWP is requesting a financial contribution of £13,825,000 . This sum excludes any costs associated with roads policing (RPU), and further detail on this will be submitted at Deadline 3.

9.6 The PIA is based on the application as submitted, but it must be noted that NWP has identified a number of areas of concern with respect to the technical work undertaken by the applicant. This relates to the validity of the TA underpinning the DCO application, the level of detail provided with respect to the operation of the Marine off-loading facility,

protest, socio-economic impacts, cumulative impacts and the applicant's proposed mitigation.

9.7 With respect to the proposed mitigation, the DCO is accompanied by a series of plans and strategies which set out how the construction and operation of the proposed Wylfa Newydd Nuclear Power station will be managed and controlled to ensure that the mitigation commitments of the Project are delivered. However, NWP does not consider the current proposals are fit for purpose and NWP has prepared a list of additional plans which need to be produced by the developer to ensure the Project is adequately controlled. Each of the following plans must be secured by a requirement in the DCO:

- Supplier Code of Conduct
- Health and Wellbeing Strategy
- Operational Travel Strategy
- Nuclear Site Security Plan
- Construction Traffic Management Plan
- Operation Traffic Management Plan
- Traffic Incident Management Plan
- MOLF Operational Plan

9.8 NWP expect to play a role in the preparation of these plans as they are all relevant to its statutory duties as a police force.

9.9 The following plans need to be approved by NWP

- Code of Conduct and Supplier Code of Conduct (if separate);
- Community safety management strategy;
- Protest management strategy;
- Nuclear site security plan; and
- MOLF Operational Plan

9.10 NWP should be consulted on these plans by IACC before approval:

- Health and Wellbeing strategy;
- Operational travel strategy;
- Traffic incident management plan;
- Jobs and skills strategy;
- Construction traffic management strategy; and
- Operation traffic management strategy.

9.11 NWP also believes that an ESEG should be established which has a role across a number of relevant plans. The ESEG will review the operation of the relevant plans listed below and consider whether the plans remain appropriate and may request changes if necessary. It must also be notified of any proposed changes to these plans submitted to IACC by HNP and given an opportunity to comment on these changes.

- Code of construction practice;
- Code of operational practice;

- Sub codes of construction practice for associated developments;
- Code of conduct and Supplier code of conduct (if separate);
- Workforce management strategy;
- Workforce accommodation strategy;
- Community safety management strategy;
- Health and Wellbeing strategy;
- Operational travel strategy;
- Nuclear site security plan;
- Protest management strategy;
- Jobs and skills strategy;
- Traffic incident management plan;
- Construction traffic management strategy;
- Operation traffic management strategy; and
- MOLF Operational Plan.

9.12 NWP would be willing to work with HNP to establish the membership, constitution, scope and role of the ESEG prior to the close of the Examination. NWP also considers that if the panel (Programme Board or WNMPOP) approach is to be adopted, then the role, structure, governance and operation of the panel should be established through an article in the DCO, with the detail of such structure also being complemented through a section 106 agreement. This was the approach taken in the confirmed Silvertown Tunnel DCO (Ref TR010021) under Article 66. As such, further detail on the proposed governance structure, and a specific article in the DCO to secure this, must be sought from HNP by the ExA.

9.13 NWP has reviewed the draft DCO as submitted in a revised form for Deadline 1. It is not considered that, at the moment, the DCO is entirely fit for purpose and a number of representations have been made in this document in relation to it. A fundamental concern, as already described, relates to the approval of plans and ensuring that the way in which the Project is controlled is sufficiently detailed and robust. Additional comments include:

- i. The definition of "associated development" and that authorised by the Project is currently very broad;
- ii. The interaction of the Project with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 is unclear;
- iii. The timing and phasing of the Project in accordance with the construction programme is not properly secured; and
- iv. Change management, that is, the further approval of plans, is currently very widely drafted and without allowing those affected by the various plans a chance to understand, be consulted on and ultimately know the document that is being used to control the development of the Project.

9.14 Finally, NWP has reviewed the Section 106 Agreement heads of terms proposed by HNP in the Development Consent Order Section 106 Agreement Status Note (REP1-010)

submitted at Deadline 1. However, NWP has not yet had sight of a draft agreement and has therefore prepared a heads of terms, setting out the obligations that need to be secured in the Section 106 Agreement (see Appendix D), or via some other mechanism contained within the DCO.

- 9.15 The requirements identified in the PIA are directly related to the Project and the impacts the Project will have on NWP and its ability to fulfil its statutory duties. The financial contribution is for cost recovery only, identified by the PIA, and is therefore fairly and reasonably related and scaled solely to the Project. On this basis NWP consider its heads of terms to set out legally robust planning obligations which meet the tests set out in Regulation 122 of the CIL Regulations 2010. Given the quantum of the financial contribution required, NWP considers that it is necessary to be a signatory to the Section 106 Agreement. This will ensure there is a direct contractual relationship between NWP and HNP and allow NWP to monitor and enforce the relevant obligations directly as a contractual party.
- 9.16 In conclusion, NWP have fundamental and unresolved concerns in relation to the increase in workforce and the impacts that will have on NWP, alongside the increase in construction road traffic. The ongoing management of these elements are critical to the operation and safety of the spaces the site and its impacts will occupy. As such, NWP needs to be involved in the drafting and agreement of the certain relevant requirements in the DCO and accompanying plans.

## Appendix

## **Appendix 1: Summary Schedule of Responses to Written Questions by North Wales Police**

**Appendix 2: Summary Schedule of Responses to Examining Authority's Written Questions by North Wales Police**

Reference	Response requested from:	Question	Response
Q4.0.114	Applicant, IACC, Welsh Government, NRW and Emergency Services	<p>A Programme Board would be responsible for setting and reviewing the monitoring programme and having an oversight of the funding from the Section 106 agreement. Can further details be provided as to how this would work in particular what process/mechanism would be put in place in the event of a dispute?</p>	<p>NWP has not been party to the discussion around the structure, governance or membership of the programme board and sub groups. NWP has raised concerns regarding membership and the lack of detail or consultation particularly with regard to governance and mechanisms including dispute resolution and decision processes through the Team Wales group*. NWP would welcome detailed discussions on the topic but at present do not feel, with the limited information available, that the structure is suitable to meet our needs to ensure that the impacts are adequately managed.</p> <p>* Team Wales Group – attendees include IACC, WAG, Gwynedd Council, Conwy Council, BCHUB, NWFRS, WAST, NWP, Public Health Wales. HNP attend for specific agenda items by request.</p>
Q10.2.10	The Applicant, IACC, GCC, NWP, PHW and BCUHB	<p>The Workforce Management Strategy [APP-413] sets out parameters for codes of conduct relating to workforce behaviour (paragraph 2.2.1) and employer behaviour (paragraph 2.3.1). Can the applicant:</p> <ul style="list-style-type: none"> <li>(a) Confirm if home based workers would have to sign the codes of conduct?</li> <li>(b) Explain what is meant by workers being off-site?</li> <li>(c) Confirm that the codes would not breach workers (in particular home based workers) Human Rights or employment rights.</li> <li>(d) Explain what the ramifications for breaching the codes would be.</li> <li>(e) Explain how the codes would be enforced?</li> </ul> <p>Are the IACC, GCC, NWP, PHW and BCUHB satisfied with the measures proposed by the WMS given the concerns they have expressed with particular reference to safeguarding and anti-social behaviour? If not, why not?</p>	<p>Please see section 6 and 7 of written representations.</p>

Reference	Response requested from:	Question	Response
Q10.2.11	The Applicant, IACC, GCC and NWP	<p>Bullet point 8 (BP8) of paragraph 2.3.1 of the Workforce Management Strategy [APP-413] states that' appropriate security checks will be carried out on construction personnel' and bullet point 17(BP17) deals with checks regarding vulnerable adults and children. Can the applicant:</p> <ul style="list-style-type: none"> <li>a) Explain why BP8 is only considered necessary for construction personnel and not the whole workforce; and</li> <li>b) Explain what would happen if the employee failed the security or screening checks?</li> </ul> <p>Can the IACC, GCC and NWP confirm:</p> <ul style="list-style-type: none"> <li>a) That the list of proposed checks in BP8 is sufficient; and</li> <li>b) Whether the proposed measures in BP8 and BP17 satisfactorily address their concerns regarding Safeguarding?</li> </ul>	<p>NWP has reviewed BP8 and has no objections to the security checks listed. However further clarification as to which roles, which security checks will be applied to along with what the procedure is should any of the checks return negative results. While some of the checks listed do not have an expiry date due the length and sensitive nature of the project site NWP would request that regular rechecks are undertaken.</p> <p>BP17 –NWP would require further details on the procedures/policies around detection and enforcement and would require this detail in order to make an assessment of adequacy. We are keen to work with HNP and our partners to assist in shaping this.</p>
Q10.3.7	BCUHB, PHW and the Emergency service providers	Q. The applicant intends to establish a Health and Well-being Monitoring Group to monitor the implementation of the Health Impact Assessment mitigation. Do you have the relevant staff and resources available to participate in this group?	Please refer to answer to Q4.0.114.
Q10.6.3	IACC, GCC, Welsh Government and Interested Parties	Q. Paragraph 3.2.15 of the Wylfa Newydd Code of Construction Practice (WNCoCP) [APP-414] lists a number of socio-economic impacts that the Applicant considers will need monitoring. Do you agree with this list? Has anything been omitted or should anything be removed?	NWP notes that the list included at para 3.2.15 does not include transport movements which could potentially have an impact on health and wellbeing in terms of noise and air quality. NWP would also expect data to be made available on the distribution of the workforce and worker numbers.
Q10.6.7	NWP	<p>The ES provides details of the number of fire and ambulance stations but no information is provided with regards to the number of police stations or how policing of the island is managed. Can you:</p> <ul style="list-style-type: none"> <li>a) Provide details of the number and location of police stations on Ynys Môn – both staffed and unstaffed.</li> <li>b) Advise whether these will be retained during the lifetime of the project or whether there are plans</li> </ul>	<p>NWP has approximately 1,500 police officers, 220 Police Community Support Officers and 1,100 police staff serving a population of 687,800 people. The Headquarters are in Colwyn Bay with divisional headquarters in St Asaph, Caernarfon and Wrexham</p> <p>NWP currently has 5 locations on Ynys Mon. These are Holyhead, Amlwch, Llangefni, Benllech and Menai Bridge.</p>

Reference	Response requested from:	Question	Response
		to reduce/consolidate stations or plans for additional or temporary stations?	The Police Impact Assessment (Appendix C of the Written Representations) has considered the current estates strategy and the predicted operational requirements for the construction of Wylfa Newydd and concluded that additional facilities would be required. A feasibility study concluded that the most appropriate and cost effective outcome was to build a new police station in Amlwch.
Q10.6.12	IACC, Welsh Government, NRW, NWP, NWFR, BCUHB, GCC and Welsh Ambulance	<p>The Codes of Construction Practice would rely on an overarching Programme Board and a series of engagement sub-groups (including for accommodation and tourism).</p> <ul style="list-style-type: none"> <li>a) How would these boards/sub-groups work in particular who would they be accountable too?</li> <li>b) Would they have a code of governance?</li> <li>c) It is indicated that you would be asked to be represented on these boards do you have the resources and the relevant personnel available to attend these boards?</li> </ul>	Please refer to answer to Q4.0.114 and Sections 6 and 7 of the written representations.
Q11.1.13	NWP	In your RR [RR-124] you allege that the baseline data used for the traffic modelling/assessment is incorrect. Can you provide further details of why you consider it is incorrect; what baseline data you consider should have been used and why and what would this mean for the TA?	Please see Section 5 of the written representations.

## **Appendix 2: North Wales Police Responses to Pre-application Consultation Stages 1, 2 & 3**

Horizon  
5210 Valiant Court  
Gloucester Business Park  
Delta Way  
Gloucester  
GL3 4FE

Our Ref: AB/5001  
Date: 5<sup>th</sup> December 2014

Dear Sirs,

**Proposed Wylfa New Nuclear Station – Stage 1 Consultation response from North Wales Police.**

I write to advise that CSJ Planning will be advising North Wales Police (NWP) on planning matters through the DCO process and I would be grateful if you could include me on your database and copy me into all future correspondence.

NWP will have a direct interest in the DCO and have been liaising with Horizon and local councils over the past 12 months in relation to this major project in particular with regard to the need for a suitable developer funded Planning Performance Agreement (PPA) to enable the full impacts and mitigation to be adequately assessed.

There was a very encouraging meeting between Horizon Directors and the Deputy Chief Constable on 26<sup>th</sup> November, at which it was agreed that in early 2015, formal discussions would begin with a view to either a bespoke PPA direct with NWP or additional funding within the existing PPA with IACC as a precursor to the mitigation discussions proper so that the impact assessment can begin in earnest. The meeting was extremely positive and has set up a strategic relationship and partnership for the future which will benefit both parties moving forward.

NWP do not wish to comment specifically on the merits or object to the land use planning matters of the scheme, and solely seek to ensure adequate s106 mitigation is provided to cover socio-economic impacts.

The overall headline point is that NWP has existing budgets based on the baseline population and additional work which will result from this major project should not be at the expense of the taxpayer. Without suitable mitigation in the form of section 106 funding for police services, the only consequence would be a reduction in the existing levels of service to the population.

NWP will work closely with the developer and Councils to ensure that the impacts upon the police service in the locality are suitably mitigated and will provide detailed

evidence to support the case for inclusion in the Local Impact Report (LIR) at the appropriate time resourced via a PPA as set out above.

I will also register with the IPC on behalf of NWP independently once the application is formally made.

### Key Issue

#### **There will be socio-economic impacts arising from the development which will require mitigation.**

NWP welcomes the inclusion of chapter 7 in the Preliminary Environmental Information Report – Volume 1 and the agreement that socio-economic factors will need to be addressed.

NWP however, feel that the bullet point list in paragraph 7.5 should specifically include – “Police and other emergency services” under the Public Services heading. This is a significant omission by your consultants, where previous comparable experience at Hinkley Point C in Somerset, shows that these services are vital to overall community cohesion and delivered substantial revenue funding through the section 106 agreements for both the associated works and DCO.

NWP welcome the identification of both local and wider socio-economic impacts. The location on an island will mean specifically with transportation, that NWP will inevitably increase its workload not only within Anglesey but Gwynedd.

NWP highlight again that paragraphs 7.48 to 7.50 should include reference to Police services, specifically key police stations in the area of impact. In relation to 7.49 it may well be true that current crime rates are comparable with the national average, but the influx of a large transient construction population is likely to exponentially increase the pressure on police services. The reference in 7.50 to future assessment is welcome and NWP would expect detailed mitigation funding to be identified early in the process for discussion.

NWP welcome the inclusion and acceptance in table 7.4 on page 85 that a potential impact will be – “Impact on crime levels and policing requirements” and that Horizon will “Work with emergency services to meet needs arising from the relevant developments”

In order to aid Horizon in the future assessment NWP will be directly affected by the proposals, in the following specific areas:-

- (i) Significant increase in work force population (4,000 generally with a peak at 8,500) that brings in a transient population impacting upon the general policing of the area and community safety;
- (ii) Increase in the need for equipment and facilities in regard to the direct impacts of the increased workforce population and the resultant increase of crimes and events associated. This will include officer equipment, training, and could include contributions to buildings, vehicles, ANPR, and communications equipment;

- (iii) Protest and disturbances against the development at or near the site;
- (iv) Police resources to comment and assess consultation documents to be aware of intelligence regarding activities;
- (v) Providing input into the planning process; and,
- (vi) Incident planning and intelligence planning in terms of health & safety and ongoing operation.

The issue of policing community safety and protest is a planning matter as crime and security is clearly a planning material consideration as part of the Spatial Planning System, as brought about by the 2004 Planning and Compulsory Purchase Act. It is, therefore, clearly a planning 'material consideration' and any implications that need to be addressed are necessary to make the development acceptable in planning terms.

The funding for the Police is directly related to the development, as without the development there would be no resulting increase in the established baseline population, and policing would continue in its current form. The funding required is not in any way to meet existing needs or deficiencies or to seek profit for NWP, but is solely directly related to the development in terms of cost recovery for actual works that will need to be undertaken.

Avon and Somerset Police set out the following factors in relation to a transient temporary workforce:-

- (1) A transient workforce will from past experience disproportionately increase issues of crime and events (events that have to be dealt with, not necessarily leading to a conviction); because –
  - (a) The increase forms a largely male dominant workforce without any direct family ties or supervision in the area;
  - (b) The normally higher than average levels of foreign workers creating implications for highway code knowledge, language issues, cultural issues; and
  - (c) Increases in impacts upon the night time economy due to mainly single population having available monies to spend.

There will also be direct increased police work as a direct result of development regarding *inter alia* -

- *Increased pressure from additional workforce population*
- *Community related disagreements causing disorder and requiring police presence*
- Anti-Social Behaviour associated with integration of workforce/workforce/accommodation locations*
- *Crime on sites (burglaries) requiring police attendance*
- *Liaison with Developer and engagement in stakeholder monitoring group including intelligence sharing*



## CSJ PLANNING

- *Input into code of practices*
- *Increased Night Time Economy*
- *Community tensions*

If the DCO does not provide mitigation then effectively the tax payer will be subsidising policing in the area and the resultant service to the existing population will be reduced.

NWP welcomes the consultation process and would welcome discussion regarding a series of future meetings to work together to ensure that impacts upon public services are mitigated

One last point is that there is a reference in Chapter 7 to the identification of existing headroom and capacity of services, but it must be made clear that there is no surplus headroom or capacity within the Police service to merely absorb an additional new temporary

workforce of 8,500 within existing work streams. It is acknowledged however, that this issue will be of a temporary nature (possibly 8 years) where revenue funding will be required to address the above impacts, but that once the Power Station is operational, the 1000 workforce would then become permanent within the tax funded police budgets.

The key contacts for future correspondence are CSJ Planning and Mr Simon Roscoe of NWP

Please take this letter as a formal response to consultation by NWP and we await further dialogue and detailed mitigation proposals.

Yours sincerely

Andrew Beard  
**Director**  
[ab@csj-planning.co.uk](mailto:ab@csj-planning.co.uk)

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FREEPOST Horizon Nuclear Power Consultation

24<sup>th</sup> October 2016

**Re: Response to Pre-Application Consultation Stage 2 (PAC 2) documentation.**

I write to formally submit the views of North Wales Police (NWP) in relation to the Pre-Application Consultation Stage 2 (PAC 2) documentation.

NWP is eager to continue the dialogue with Horizon Nuclear Power (HNP) and looks forward to working together to continue making a safer North Wales.

We welcome the commitment from HNP to provide all the additional public services that would be required to support the increased population during the construction phase.<sup>1</sup>

However prior to construction phase NWP has already seen an impact on the organisation from the work created by the need to assess and respond to the proposals. Regular project boards chaired by Deputy Chief Constable Pritchard are held to coordinate the increase in work. It is expected that this impact will significantly increase with the need for NWP to examine and comment on the Development Consent Order (DCO) and a significant number of Town and Country Planning Applications.

Based on all the information seen to date, NWP are of the belief that the development will have a significant impact on the organisation. Overall the proposals need to ensure that NWP will be adequately resourced to ensure that policing is fully effective in the area and can cover all eventualities without detriment to the existing communities.

The key issues for the Police to deal with in relation to the developments are:

**Increase in Demand**

The influx of workers for the developments will undoubtedly cause an increase in demand for NWP. Listed below but not limited to, are some of the issues NWP might expect and need to be considered prior to submission of applications by HNP:

<sup>1</sup> Preliminary Environmental Information Report Non-Technical Summary – 10.12 Page 33  
Version 1.0



- Pressures from the increased night-time economy
- Incidents and crimes on sites requiring police attendance
- Increase in response times
- Protest
- Operational Planning
- Roads Policing
- Custody Capacity
- Officer numbers and recruitment especially in specialist roles.
- Police station location and capacity
- Translation services
- Safe guarding the most vulnerable and those likely to be exploited
- Cyber-crime<sup>2</sup> relating to both businesses and individuals during the build and operation.

### Traffic & Transport

NWP agree with the outline Transport Objectives highlighted in the Jacobs report<sup>3</sup>, however we strongly disagree with the statement relating to the A5025 between Wylfa and Amlwch that states<sup>4</sup>

*“The work carried out to date shows that there are no highway capacity or highway safety reasons which would justify physical intervention, for example through road widening.” and “The serious accidents that have occurred at the locality appear to be caused by excessive speed and poor driving. It has therefore been concluded that widening of the existing carriageway and improvements to road geometry (which could lead to increased traffic speeds) may not be appropriate. For this reason, no physical widening works are proposed.”*

A report<sup>5</sup> prepared by NWP in November 2014 and shared with Isle of Anglesey County Council states clearly<sup>6</sup> that *“The top contributory factors for zone 1 were; road layout (e.g. bend, hill, narrow road) and road layout affecting visibility (e.g. bend, winding road, hill crest).”*

NWP therefore requests that the A5025 between Wylfa and Amlwch is re-examined with consideration given to all options including road layout.

<sup>2</sup> The ONS estimated that there were 2.46 million cyber incidents and 2.11 million victims of cyber-crime in the UK in 2015. Proportion of total UK Crime in 2015 – Cyber Crime 53% (36% Cyber enabled fraud, 17% Computer Misuse), 47% All other Crime (Source: ONS)

<sup>3</sup> Traffic & Transport – Technical Note for Stage Two Pre-Application Consultation – August 2016

<sup>4</sup> Traffic & Transport – Technical Note for Stage Two Pre-Application Consultation – August 2016 - Page 11

<sup>5</sup> NWP Summary Report: Route Analysis A5025 Valley to Amlwch 21/11/2014

<sup>6</sup> NWP Summary Report: Route Analysis A5025 Valley to Amlwch 21/11/2014 – 36 Page 5



In addition we request that the below traffic and transport issues are considered further prior to submission of any application. Examples of areas for further consideration are, noting further issues may emerge as information comes to light:

- Integrity of the Key routes including the A5025, the strategic important A55 including the Britannia Bridge
- How will keeping these routes open at all times be achieved?
  - Daily congestion already occurs at the Britannia Bridge and in recent months the A55 has been closed a number of times due to incidents<sup>7</sup> for up to 10 hours at a time
- Stacking/Staging areas along key routes, including on the mainland in the event of route closure
- A wider assessment of the A55 and A494 to the English border as both workers and goods will likely have to travel along these routes to the Island
- How Emergency Response times to incidents will be maintained
  - E.g. recovery of broken down vehicles in areas of road works
- High level of compliance by all users along these routes
- Consideration of the need for average speed cameras or variable speed limit capability for the Britannia Bridge to reduce the likelihood of accidents and structural damage resulting in road closures from the increase in traffic
- Consideration should also be given to the impacts on other arterial routes off the A5025 including the suitability of alternative routes as local residents and others will seek to avoid traffic lights and disturbance wherever possible. Consultation on the alternative routes should also occur both with North Wales Police and Isle of Anglesey County Council's Highways Department
- NWP need to be Key Stakeholders and are not mentioned in pages 23 and 89 of the report<sup>3</sup>
- Robust traffic management plan to control both staff and HGV movements both to and from the main site and associated developments.

### **Building Design**

NWP have already had early discussions with HNP about the design of the onsite and offsite accommodation and achieving Secured by Design (SBD) certification for the permanent housing and temporary accommodation.

We welcome this engagement and are happy to support HNP to achieve this status.

NWP recommends that all associated developments are either SBD certified, if they qualify and were not<sup>8</sup>, designed to the SBD principles.

The benefits of SBD are supported by independent academic research consistently proving that SBD developments experience up to 75% less burglary, 25% less criminal damage<sup>9</sup>.

<sup>7</sup> Chemical Spill at Old Colwyn March 2016 10 hour closure. Conwy Tunnel Closure August 2016 2.5hr closure

<sup>8</sup> Secured by Design certification can only be awarded to permeant buildings.

<sup>9</sup> Source <http://www.securedbydesign.com/about-secured-by-design/>



**Other comments**

- B1.26, Page 6, Wylfa Newydd Project Pre-Application Consultation – Stage Two Preliminary Environmental Information Report states that NWP have five police stations in the Key Socio-economic Study Area located at Llangefni, Benllech, Holyhead, Bangor and Caernarfon. This information is incorrect.

Currently NWP has the following ten stations in the KSA: Llangefni, Amlwch, Benllech, Holyhead, Menai Bridge, Caernarfon, Bangor, Bethesda, Llanberis, Penygroes. It should be noted that not all these police stations have public front counters and those that do are only open for a restricted number of hours per week.

- The work force Code of conduct is mentioned throughout the consultation but with no detail behind it. NWP request that HNP engage thoroughly in the composition and enforcement of the code as we believe this will be essential in maintaining community cohesion and safety for all.
- Consideration needs to be given to the marine security of the Marine Offload Facility (MOLF) including the potential for waterborne protest.
- Equality Impact Assessment – NWP are satisfied with the contents of the document at this stage, but are eager that the document does not remain static and is regularly updated as the project progresses and further information is available.

We await further dialogue and detailed mitigation proposals.

Regards

James Davies  
Rheolwr Proiect / Project Manager



James Davies  
Rheolwr Prosiect / Project Manager  
Swyddfa'r Rhaglen Gorfforaethol / Corporate Programme Office  
Heddlu Gogledd Cymru / North Wales Police  
Pencadlys Yr Heddlu / Police Headquarters  
Bae Colwyn / Colwyn Bay  
Conwy  
LL29 8AW

FREEPOST Horizon Nuclear Power Consultation

22<sup>st</sup> June 2017

**Re: Response to Pre-Application Consultation Stage 3 (PAC 3) documentation.**

I write to formally submit the views of North Wales Police (NWP) in relation to the Pre-Application Consultation Stage 3 (PAC 3) documentation.

NWP is eager to continue the dialogue with Horizon Nuclear Power (HNP) and looks forward to working together to continue making a safer North Wales.

The key issues that have been raised by NWP in response to Pre-Application Consultation Stage 2 (PAC 2) on the 24<sup>th</sup> October 2016 in relation to the developments, are still of concern with the majority having not been assessed or resolved in either the project update or the Pre-Application Consultation Stage 3 (PAC 3) documentation.

Despite repeated attempts to engage with HNP, up until recently the level of communication and consultation with NWP has been severely lacking. We therefore welcome the appointment of the Stakeholder Liaison Manager, but are still concerned over the lack of progress to assess and agree mitigation for the Development Consent Order. We would welcome a detailed explanation of HNP's planned approach to the DCO including a document schedule.

Although the document makes note of the fact that the workforce number and subsequent impacts have been reduced. Up to 9000 workers is still a significant number and will have an impact. NWP is keen to understand the full suite of mitigations proposed and how these will be monitored and if necessary, enforced.

Based on all the information seen to date, NWP are still of the belief that the development will have a significant impact on the organisation and the public it serves. Overall the proposals need to ensure that NWP will be adequately resourced to ensure that policing is fully effective in the area and can cover all eventualities without detriment to the existing communities.



**Key comments relating specifically to PAC 3 documentation.**

**Traffic & Transport**

Of concern to NWP is the potential for an increase in the amount of fly-parking which could be a side effect of the increase in car sharing and shuttle buses. We therefore welcome that “further work is being undertaken to investigate the potential need for any further mitigation, such as park and share facilities.”<sup>1</sup>

**A5025**

NWP welcomes the commitment to undertake further assessment of A5025 between Cemaes and A55 Junction 8 at Menai Bridge<sup>2</sup> but would seek to clarify the paragraph under the heading “Transport” on Page 169 whether this funding package is in addition to the measures in 6.8.21 page 148.

We await further dialogue and detailed mitigation proposals.

Regards

James Davies  
Rheolwr Prosiect / Project Manager

<sup>1</sup> Wylfa Newydd Pre-Application Consultation Stage Three – Main Consultation Document Page 125 6.4.6

<sup>2</sup> Wylfa Newydd Pre-Application Consultation Stage Three – Main Consultation Document Page 148 6.8.21

## **Appendix 3: North Wales Police: Police Impact Assessment**



# Wylfa Newydd

## Police Impact Assessment

**Compiled by:** Portfolio Management Office, North Wales Police

**Date:** 4<sup>th</sup> December 2018

Police Impact Assessment v5.0

Page 1 of 27

Planning Inspectorate submission



## 1. EXECUTIVE SUMMARY

To undertake this impact assessment and to consider in detail the substantial amount of information within the Development Consent Order application submitted by Horizon Nuclear Power (HNP), North Wales Police (NWP) has needed to dedicate resources and have also taken expert planning advice. This has been necessary to ensure that all the facets of the development are considered against the medium and long term position of the organisation.

Incident and crime data from North Wales has been analysed to calculate the impact the Wylfa Newydd Nuclear Power Station will have on policing. During the period of construction additional Police resources will be required.

As expected, the impact is at its greatest during 2023<sup>1</sup> when Wylfa Newydd construction workers numbers are at their peak and up to 7,000 additional non-local workers will be residing near to their place of work. In order to maintain a level of policing from this large influx of population without having a detrimental impact on policing the existing Anglesey community, North Wales Police will require additional resources and equipment.

We predict that incident and crime demand will drop significantly when Wylfa Newydd construction workers leave the site and it becomes solely an operational nuclear power station. This report does not consider the impacts post construction.

Should the number of non-local construction workers increase from the currently reported 7,000<sup>2</sup>, then the level of policing resource will need to be amended accordingly to reflect this.

This assessment is evidence based with professional opinion applied, and utilises the timelines known at the time of writing the report. Should these timelines change, there will be a consequential alteration in the timing of the project impact. A schedule of payments for the required policing resources is to be agreed. Costs have been made up of the following three separate elements, staff core requirement, capital core requirement and abnormal loads. The future costs have not been adjusted to account for potential inflation increases. These costs will need to be adjusted for inflation at the time of payment.

North Wales Police is concerned with maintaining the wider security envelope in Anglesey. The Wylfa Newydd development is part of a number of developments that are occurring on Anglesey during a similar timeframe and has to be considered in that context.

### 1.1 JUSTIFICATION FOR MITIGATION

The proposed development at Wylfa Newydd is classed as a Nationally Significant Infrastructure Project (NSIP) by sections 14(1)(a) and 15 (2) of the Planning Act 2008 as it comprises an electricity generating station with a capacity of more than 50MW in Wales. The proposed development falls within Schedule 1(2)(b) of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 and requires an Environmental Impact Assessment (EIA) to be undertaken. The application for development consent was accompanied by an Environmental Statement, which included an assessment of the traffic and transport and socio-economic impacts of the development – issues which are of particular pertinence to North Wales Police and its statutory duties and operations.

National Policy Statement (NPS EN-6) states that:

*Through the EIA, and in accordance with Section 5.12 of EN-1, the applicant should identify at local and regional levels any socio-economic impacts associated with the construction, operation and decommissioning of the proposed new nuclear power station. (Para 3.11.3)*

<sup>1</sup> Dates are based on information from Draft Development Consent Order documents supplied by Horizon Nuclear Power and should be taken as guidance only and are subject to change.

<sup>2</sup> Horizon Nuclear Power provided information.



*This assessment should demonstrate that the applicant has taken account of, amongst other things, potential pressures on local and regional resources, demographic change and economic benefits. (Para 3.11.4)*

and

*Applications should demonstrate that the proposed development would not have an unacceptable adverse impact on significant infrastructure. The IPC should take into account any local authority impact report, advice from the relevant Nuclear Regulators and relevant policy in NPSs in assessing impacts on significant infrastructure and resources. (Para 3.15.2)*

*In particular, the Nuclear AoS identified that there may be adverse effects during the construction and decommissioning phases on regional transport networks that may already be under stress, particularly where there are clusters of potentially suitable sites for new nuclear power stations. In considering this issue the policy set out in Section 5.13 of EN-1 (Transport and Traffic impacts) applies. (Para 3.15.3)*

The consideration and mitigation of transport impacts is an essential part of Government's wider policy objectives for sustainable development (NPS EN-1, para. 5.13.1). NPS EN-1 goes onto to state that applicants need to assess all relevant socio-economic impacts, which may include (para. 5.12.3):

*the impact of a changing influx of workers during the different construction, operation and decommissioning phases of the energy infrastructure. This could change the local population dynamics and could alter the demand for services and facilities in the settlements nearest to the construction work...There could also be effects on social cohesion depending on how populations and service provision change as a result of the development; and*

*cumulative effects – if development consent were to be granted to for a number of projects within a region and these were developed in a similar timeframe, there could be some short-term negative effects....*

In line with the policy provisions of NPS EN-1 and EN-6, the applicant is required to mitigate any significant impacts resulting from the proposed development including those of relevance to North Wales Police – socio-economic, health and well-being and transport. Mitigation can be secured through development consent obligations that are agreed between the applicant, local authorities and other relevant parties. To be taken into account by the Examining Authority, these planning obligations must be relevant to planning, necessary to make the proposed development acceptable in planning terms, directly related to the proposed development, fairly and reasonably related in scale and kind to the proposed development, and reasonable in all other respects.

This statement sets out the likely adverse impacts of the proposed development on the operations and duties of North Wales Police, and identifies the level of obligation required to mitigate these.

## 2. INTRODUCTION

This document considers the challenges posed to North Wales Police (NWP) by the proposed future development of Wylfa Newydd and the associated works and seeks to establish and validate the potential financial mitigation implications for the main stakeholder and planner, namely Horizon Nuclear Power (HNP).

It is important that in any planning development and for the services within it the developers should take in to account the needs and effects to all sectors of the community. Where a development proposal will place an increased burden on the provision of existing services a case can be made to justify contributions from a new development for the upgrade of that provision, or the provision of new facilities and / or services to make good any deficiencies resulting as a consequence of the new development. North Wales Police considers it imperative that this new development should not detract from the current quality of services and facilities made available to the Force's existing population and communities.

NWP considers community safety to be a primary objective. Access to a good standard of policing services plays an important role in maintaining safety and developing a communities' well-being.

This paper provides the justification for Section 106 obligations including payments towards mitigation measures and for the provision of additional services that will be required by NWP. The funding will enable NWP to fulfil its statutory obligations by delivering community safety, prevention and detection of crime and disorder and policing the impacts of the HNP Development Consent Order (DCO) for Wylfa Newydd should it subsequently be approved by the Secretary of State.



The requirements for the NWP provision are directly related to this development. It is clear that without the development there would be no significant increase in workforce population, traffic movements and no other impacts arising from Wylfa Newydd.

Therefore the established baseline population of policing would continue in its current form. The funding required is not in any way to meet existing needs or deficiencies or to seek profit for NWP. It will be used solely or directly related to the development in terms of cost recovery for actual policing services and works undertaken to ensure consistency in public safety and policing.

As suggested the Section 106 contribution would be specific cost recovery only, identified from policing the arising impacts, the costs for meeting such impacts and therefore by definition, will be fairly and reasonably related and scaled solely to the Wylfa Newydd development.

To date some information has been provided by HNP but it currently lacks specific details as to the various phases of the development and the impact in terms of the Marine Off Loading Facility (MOLF), the increase in workforce numbers and traffic movement that each phase will bring. NWP predictions at this time are therefore, as agreed with HNP, based on the limited information provided in the Draft Development Consent Order. We will continue to re-assess the mitigation requirements throughout the project build and beyond using evidenced based data and professional judgement in doing so. There should be a mechanism in the Section 106 Agreement to facilitate this.

Whilst we recognise some of the potential benefits Wylfa Newydd will bring to the local communities the cumulative impact of a number of nationally and locally significant additional developments on Anglesey will undeniably pose key medium to long term risks for NWP that we must seek to assuage.

#### **Key Threats and Projected Increase in Policing Demand**

There will be socio-economic impacts arising from the development which will require mitigation.

NWP will be directly affected by the proposals in the following specific areas:-

- Significant increase in work force population that brings in a transient population impacting upon the general policing of the area, community safety and a potential increase in crime;
- Increase in the need for equipment and facilities to mitigate the direct impacts of the increased workforce population and the resultant potential increase in crimes and associated events;
- Protest and disturbances against the development at or near the site and at associated developments;
- Police resources to comment, monitor, manage and assess documents in line with the DCO and any subsequent amended submissions, Traffic Incident Management and for Planning and Contingency Response Arrangements.
- Incident planning and intelligence gathering in terms of health & safety and ongoing operations;
- Significant increase in the volume of traffic movements to and from the Wylfa Newydd site, the associated developments and other routes beyond the Key Socio-economic Study area<sup>3</sup> within the NWP area, leading to a potential increase in road traffic collisions and traffic delays requiring a policing input.
- Potential community related disagreements causing disorder and requiring police presence, Anti-Social Behaviour associated with integration of workforce/workforce accommodation locations
- Potential crime on sites (burglaries, thefts) requiring police attendance
- Potential increase in Night Time Economy Activity and the accompanying likelihood of Modern Day Slavery criminality.
- Community tensions and traffic related matters due to increased flows in traffic

NWP sets out the following factors in relation to a mainly male transient temporary workforce who at the height of build are estimated to be up to 7000 and a suggested 'churn over' rate of 35,000-40,000.

Studies / initiatives by the police service have established that a transient workforce will bring a disproportionate increase in issues of crime and incidents; because –

- the increase forms a largely male dominant workforce (HNP projected average ages 35-49 years) without any direct

<sup>3</sup> WDA as defined in document C1.Project-wide effects - Socio-economics, Draft Submission for Review September 2017, Page 8 , Figure C1-2 Key socio-economic study area.



family ties or supervision in the area;

- the normally higher than average levels of foreign workers creating implications for highway code knowledge, language issues, cultural issues; and
- Increases in impacts upon the night time economy due to mainly single population having available monies to spend.

Community Safety, the prevention and detection of Crime and Disorder are key statutory obligations for NWP. The potential of the Wylfa Newydd proposals both at the main site and associated developments, along with the expected transient workforce during construction, will undoubtedly lead to an increase demand in policing. Impacts from this development will result in the requirement of additional resources, staff and equipment and will place an additional financial burden on NWP's current restricted budget.

In order to establish the initial financial mitigation costs, Wylfa Newydd presentations were delivered to all NWP internal key stakeholders and Departments. Following this they were requested to produce projected impact assessments for their area of business. Where possible the initial impact assessments in advance of the build were to include evidence based assumptions of the likely and predictable demands of Wylfa Newydd.

The Initial Impact Assessments have now been completed and provide the necessary detail and justification for the mitigated compensation package being sought from HNP and are summarised in the following pages.



### 3. NORTH WALES POLICE – CURRENT POSITION & STRUCTURE

#### 3.1 CONTEXT

The construction of Wylfa Newydd including its associated developments will have a significant impact on the demand on police resources in the area and beyond.

The Wylfa Newydd Nuclear Power Station is estimated to require 9,000 construction workers at peak construction<sup>4</sup>, of which an estimated 7,000 will be non-home-based, in addition there could be 505 dependants. HNP also estimate of the 7,000, 19%/1,705 could come from overseas. These workers would introduce diversity that does not currently exist on Anglesey.

North Wales Police cover the whole of North Wales and includes the counties of Isle of Anglesey, Gwynedd, Conwy, Denbighshire, Flintshire and Wrexham. The area is mostly rural and includes the Snowdonia National Park. It also has a vast coastal area around Anglesey, the Llyn Peninsula and the north coast of Wales. NWP have approximately 1,500 police officers, 220 Police Community Support Officers and 1,100 police staff serving a population of 687,800 people.

The Headquarters are in Colwyn Bay with divisional headquarters in St Asaph, Caernarfon and Wrexham.

The Eastern part of North Wales contains the most populous areas, such as Wrexham and Deeside, while popular coastal resort towns include Rhyl, Llandudno and Pwllheli. North Wales has two cities, namely Bangor and St Asaph, Bangor is an University City which houses approximately 16,605 students. The major A55 road links the area to cities like Manchester, Liverpool and Birmingham and the Port of Holyhead on Anglesey where ferries sail to Ireland.

North Wales Police is led by T/Chief Constable Gareth Pritchard, T/Deputy Chief Constable Richard Debicki, T/Assistant Chief Constable Neill Anderson and Richard Muirhead, Interim Director of Finance and Resources.

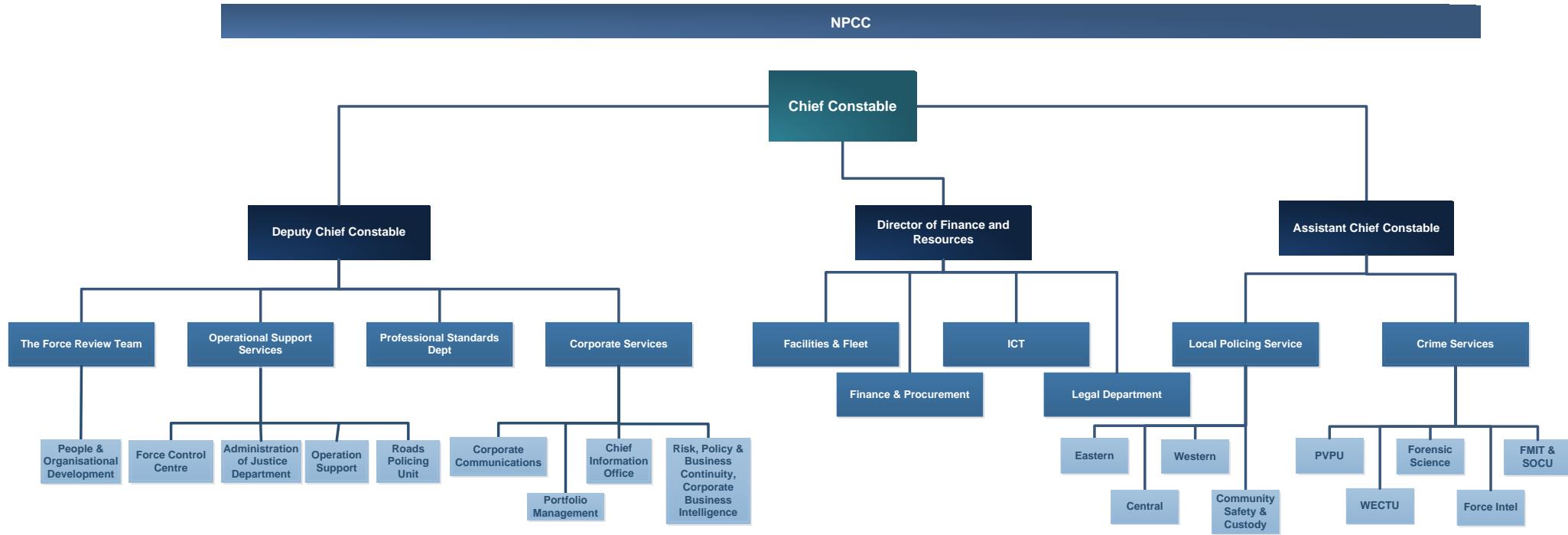
Our Vision is a safer North Wales. It is very difficult to predict the future, but whatever happens, we will be here to protect our communities.

Our priorities are:

- To protect our communities, in public, private and online.
- To pursue those who cause the greatest harm
- To prepare our capabilities for the future.

The North Wales Police and Crime Commissioner (PCC) is responsible for holding the Chief Constable to account to ensure that the force support the delivery of the objectives detailed in the police and crime plan and to meet all their statutory duties. Arfon Jones was elected the Police and Crime Commissioner for North Wales on 5<sup>th</sup> May 2016. He will remain in office until the next elections which will be held in May 2020.

<sup>4</sup> C1. Project-wide effects - Socio-economics, Draft Submission for Review September 2017





## 4. ANALYSIS

### 4.1 ASSUMPTIONS

In order to effectively assess the proposals, the force was split into the Business Areas and assessed by the information provided Horizon Nuclear Power (HNP) functions:

#### Functions

Additionality of resources have been identified for the following functions:

- a) Local Policing Services - Response, Neighbourhood Policing Team (NPT) and Local CID
- b) Custody
- c) Operational and Emergency Planning
- d) Road Policing Unit (RPU) and Commercial Vehicle Unit
- e) Force Control Centre
- f) Managed Response Unit
- g) Investigation Support Unit
- h) Crime Services - All functions
- i) Administration of Justice
- j) Programme Management and Support
- k) Training

#### Resourcing Requirements

Resourcing requirement of each function at peak has been provided by each function based on a combination of:

- Service Area Review including Analytics
- Demand and Capability Unit Analytics
- Budgeted Staffing establishment uplifted in proportion to Population Growth
- Professional Judgement

The calculations and/or methodologies used for the NWP analysis are included in the detailed Impact Assessments contained within the appendices.

The increase and decrease of resources have been aligned on basis of workforce provided by Horizon or stage of the construction and impact on road infrastructure

Function	Method of Review	Method for Phasing of Resources required by Year
a) Local Policing Services - Response, NPT and Local CID	Demand & Capability Unit Resource Allocation Modelling overlaid by Western Senior Management Team Professional Judgement with regards Management and Supervision levels	Workforce Numbers
b) Custody	Demand & Capability Unit - Custody Resource and Arrests modelling	Workforce Numbers
c) Operational and Emergency Planning	Professional Judgement and dialogue with the Hinkley Point Project and Avon and Somerset Police (A&SP)	Workforce Numbers and Construction Phase
d) Road Policing Unit - RPU and Commercial Vehicle Unit	Service Area Review undertaken by RPU with resourcing based on modelling of Road Infrastructure Capacity and Resilience based on HGV and Workforce movements impacting upon A55 corridor, Gwynedd and Isle of Anglesey overlaid by analytics on Collisions, Drug/Drink Driving, Collisions etc.	Vehicle Movements, Workforce Numbers and Construction Phase



	The Commercial Vehicle Unit who would ensure the compliance of heavy goods vehicles associated with the build	
e) Force Control Centre	Demand and Capability Unit Call Modelling proposes at peak a 1.9% increase in calls, with corresponding increase in budgeted establishment applied	Workforce Numbers
f) Managed Response Unit	Population at peak increases by 1% with uplift applied to units current budgeted establishment	Workforce Numbers
g) Investigation Support Unit	Population at peak increases by 1% with uplift applied to units current budgeted establishment	Workforce Numbers
h) Crime Services	Population at peak increases by 1% with uplift applied to units current budgeted establishment and one post for proactive elements	Workforce Numbers
i) Administration of Justice	Population at peak increases by 1% with uplift applied to units current budgeted establishment	Workforce Numbers
j) Programme Management and Support	Professional Judgement	Vehicle Movements, Workforce Numbers and Construction Phase
k) Training	Aligned to recruitment of Staff and Officers	Based on officers numbers and training requirements

#### Up Front (Lead Time) and Exit Costs

There is usually an 18 month lead time in terms of commencement of officer recruitment to the time that they have been trained and can become operational.

The resourcing has built in a 12 month lead time for resourcing to cover the training aspect.

In terms of staffing reductions, some exit costs may be incurred in downsizing the organisation both in Officer and Staff numbers. The staff numbers may reduce due to natural wastage but there may be a requirement to build in costs due to combination of delay in being able to release staff from the organisation or payment of exit packages.

Assumption 10% of Peak Cost applied to Years 7, 8 and 9 when majority of reductions incurred.

## 4.2 LOCAL POPULATION

Figures from the mid-year 2016 population estimates put the existing population of Anglesey and Gwynedd North at 130,060 and the population of North Wales at 694,826. The population split for North Wales is 49% male and 51% female.

## 4.3 CRIME AND INCIDENT DEFINITION

The Home Office counting rules for recorded crime defines Incidents and Crimes as the following:

### Incidents

All reports of incidents, whether from victims, witnesses or third parties and whether crime related or not, will result in the registration of an Incident Report by the police.

### Crimes

An incident will be recorded as a Crime (notifiable offence)

1. For offences against an identified victim if, on the balance of probability:



- (a) The circumstances as reported amount to a crime defined by law (the police will determine this, based on their knowledge of the law and counting rules), and
- (b) There is no credible evidence to the contrary.

2. For offences against the state the points to prove to evidence the offence must clearly be made out, before a crime is recorded.

#### **4.4 CURRENT CRIME AND INCIDENT RATES**

In Wales there is a strong positive correlation between population and reported incidents and crime; meaning areas with larger populations experience more reported incidents and crime. The population increase in this area will generate a need for additional police resource.

There is a shift occurring in the demand on the Police service, resources that will deal with drunkenness, public order and missing persons, are also having to deal with the increasing demands Cybercrime is bringing. Traditional crime, from mortgage fraud, theft and blackmail to child exploitation, harassment and intimidation has migrated online.

With the growth of the internet, social media, online-shopping and banking and connected devices, Cybercrime has become a powerful tool for criminal organisations and individuals.

Cyber Crime is not limited to large criminal organisations. It includes crimes committed at much more personal levels such as bullying, identity theft or stalking.

Note needs to be made that the alignment of policing resources will need to consider this increasing demand as technology and time progresses.

### **5. STAFF CORE REQUIREMENT**

#### **5.1 LOCAL POLICING SERVICES IMPACT – Response, Neighbourhood Policing Team and Local CID**

Local Policing Services (LPS) provides initial policing contact and assistance to the public in both immediate and non-emergency incidents throughout the North Wales area. The LPS portfolio covers all aspects of policing functions from Patrol, Custody, Special Constabulary and Safer Neighbourhood Teams to support services such as Community Safety and more complex investigations supported by the CID unit.

##### **5.1.1 RESPONSE OFFICERS**

In Wales there is a strong positive correlation between population and reported incidents and crime; meaning areas with larger populations experience more reported incidents and crime.

A resource allocation model based on the predicted increase in demand details the point in which additional resources will be required in the Anglesey and Gwynedd North area due to the population increase. This is intended to reflect the expected increase in demand due to the increase in population alone and does not reflect the impact of any additional policing activities related to the development.

The predicted increases in crime and incidents have been fed through a resource model in order to estimate the additional resources required to deal with the extra demand.

Full analysis of this model and the methodology utilised can be found in Appendix A.

A Resource Allocation Model for Policing was created for the Anglesey and Gwynedd North area, which reflects current demand and current resources for the area.



The model inputs include:

- Incidents
- Crime and non-crime occurrences
- Unplanned events such as missing person searches, scene preservations and hospital watch
- Abstraction rates
- Time spent on other tasks, such as briefings, refs and mobile patrol

The model estimates that the 7.8% increase in crime and 6.1% increase in incidents and non-crimes (keeping all other model inputs equal) would require an additional 9.0 Constables and 2.0 Police Community Support Officer's (PCSO), which represents a 6.5% increase in resources compared to original model outputs.

However, this model does not include the additional supervision/management that would be required, or the minimum number required to have a complete police rota.

In summary, the Western Senior Management Team (SMT) have reviewed the numbers documented above and applied professional judgement to identify any additionality required to meet these practicalities.

At peak this equates to a total increase of 11.0 Constables, 2.0 sergeants and 4.0 PCSO's.

## 5.2 CUSTODY IMPACT

Custody units provide detention facilities across North Wales that meet the needs of all detainees. All custody staff are trained to national standards and ensure compliance with legislation and national guidance that impact on investigations.

By managing and monitoring the progress of investigations custody staff ensure maximum use is made of the initial period of detention, reducing the need for bail and ensuring charge decisions are made at the earliest opportunity. This reduces the likelihood of further crimes and anti-social behavior (ASB) being committed and helps increase community confidence in the police.

This section aims to estimate the potential increase in Custody demand experienced as a result of the increase in the residential populations in Anglesey and Gwynedd North due to the Wylfa Newydd development. The full analysis can be found in Appendix C.

It is assumed that the impact on the custody function will be limited Caernarfon Custody as this is the only active custody suite in the West.

### **Current Demand**

- Current planned establishment for Caernarfon Custody is 10 sergeants and 7 custody detention officers (CDOs), with a desirable staffing level (DSL) of 2 sergeants and 1 CDO.
- There were 3,245 detentions in Caernarfon Custody in 2017/18, and the average length of detention (excluding hospital absences and bail backs) was 12.8 hours.
- Caernarfon Custody has 16 cells, and displayed a cell occupancy rate of 34.5% in 2017/18. Cell capacity was reached on one occasion for a period of two hours in August 2017.
- Cell occupancy is variable through the week, with peak demand following Friday and Saturday nights.

### **"As-is" Resource Model**

An "as-is" utilisation model for custody has been built which seeks to mimic custody demand and staff utilisation. This "as-is" model has been used as a baseline for testing how the increase in population is likely to affect resourcing in Custody.

The model for Caernarfon Custody estimates that the average utilisation rates are 62.2% for sergeants and 98.3% for CDOs.



## Arrests Model

An incident-population model estimates that an increase of 7,000 to the population in Anglesey and Gwynedd North would result in a 6.1% increase in reported incidents.<sup>5</sup>

In the last 12 months, the average number of first arrests per incident was 0.08, and this has been a relatively consistent ratio for the past 3 years.

We can therefore assume that any increase in incidents would have a proportionate increase in the number of first arrests, with associated increases in the number of bail backs and subsequently, the total number of detentions:

*Estimated Number of Detentions at Peak Worker Scenario<sup>6</sup>*

	2017/18	Estimated Peak Worker Scenario
Total Detentions	2,747	2,915
First Arrests	2,671	2,834
Bail backs	76	81

### 5.2.1 ESTIMATED IMPACT OF WYLFA NEWYDD

#### **Cell Occupancy**

It is estimated that the projected increase in cell occupancy could be managed by Caernarfon Custody for the majority of the time. However, Caernarfon has the highest cell occupancy rate of all NWP suites and is the only one to have reached maximum capacity in the past 12 months. Therefore, there will be a greater risk of reaching cell capacity as arrests are forecast to increase.

Some simplistic simulations estimate that cell occupancy could be reached 3 times in the year. It is, however, unlikely that cell capacity would be exceeded, and if it was, indications are that St Asaph would have cell capacity to absorb the additional demand for a limited time.

#### **Staff Utilisation**

The models indicate Caernarfon sergeants would be able to absorb the estimated increase in demand without additional resource.

However, CDO utilisation, being already high in Caernarfon, would exceed 100% at peak times and sergeants would not be able to absorb the excess CDO demand at these points.

It is estimated that Caernarfon would require an additional 1 CDO for a minimum period of 4 hours on Saturday morning and 8 hours on a Sunday morning to deal with demand, plus at some peak times of weekdays.

It is not expected that the increase in population and any associated increase in arrests would result in the requirement for the opening of another custody suite.

However, projections indicate that some additional resource would be required in Custody in order to meet peak demand if arrests increase. An additional resource would not be required 24/7, and therefore a bid for an additional resource per rota in order to meet an increased DSL would not be justified. However, an additional 1 FTE in custody would give more resilience to enable peak demand to be dealt with effectively.

Furthermore, in order to maintain the staff to population ratio, an additional 0.91 FTE (sergeant + CDO) would be required in Caernarfon Custody.

It is therefore recommended that an additional 1 FTE should be requested to deal with additional demand related to the Peak Worker Scenario.

<sup>5</sup> "Impact of Population Changes on Demand and Resources – Wylfa Newydd"

<sup>6</sup> The Peak Worker Scenario is an increase of 7,000 to the population in Anglesey and Gwynedd North



### 5.3 OPERATIONAL AND EMERGENCY PLANNING

Operational Support Services (OSS) has corporate ownership of Operational and Emergency Planning matters.

The Department's aim:

'Ensure preparedness of the Organisation in the event of Major Incidents, Emergencies and High Risk Operations, providing necessary tactical advice for such events and supporting organisational learning'.

The Department has core responsibilities within the following business areas:

- Emergency Plans and Risk
- Flooding, Pollution and Weather
- Search
- Control of Major Accident Hazards (CoMAH) and Pipeline
- Nuclear
- Critical State (including Operation Temperer)
- Counter Terrorism planning
- Joint Emergency Services Interoperability Programme (JESIP)
- Force level events and operations
- VIP/Royal Visits
- Holyhead Port
- Mobilisation and Logistics
- Disaster Victim Identification and Mass Fatality planning
- Football
- Chemical, Biological, Radiological, Nuclear, and Explosive (CBRNe)
- Prison
- Drone Operations
- Public Order
- Offshore Industry and response
- All matters connected with the Civil Contingencies Act 2004 -
  - North Wales Resilience Forum (NWRF)
  - Strategic Coordination Centre
  - Strategic and Tactical Coordination Groups

The Department has specialist skilled officers trained as Counter Terrorism Security Coordinator (CT SecCo), Police Search Advisor (PolSA), Public Order Tactical Advisor (POTAC), Dedicated Football Officer (DFO) Risk Assessment (RA), Offshore Rescue Management (OSARM), Police Mortuary Operations Coordinator, Airwave Tactical Advisors and Structured Debriefing.

The Department also owns and manages force policies around:

- Silver Command
- Contingency Planning
- Hostage and Crisis Negotiation
- Policing Events
- Public Order Policing
- Search

The Department has the responsibility for the development, maintenance and exercising of all Plans which are associated with the above core responsibilities, including security planning around some key subject areas.

To estimate the impact, taking into consideration the role of the Operational and Emergency Planning Department within North Wales Police, consideration will need to be given to:

- The development of the plans, both CoMAH and Radiation (Emergency Preparedness and Public Information) Regulations (REPPIR)
- Planning for emergencies and contingencies
- Policing of protests both at the site and associated sites with the project
- Strategic Coordination Centre



- Exercising of plans
- Mutual Aid

It is recognised that with the current decommissioning sites at Wylfa and Trawsfynydd the Department already has ongoing commitments in relation to the nuclear industry. Associated nuclear meetings are already scheduled within the department and supported by the nuclear lead. The additional work and considerations required in relation to the new build projects will have a substantial impact and do not form part of that scheduled work, therefore, the proposal is to separate and identify the additional workload that this new build project injects to the department.

The various stages of the development programme for the new build will bring about varying challenges to the Department, which will be required to draw up plans and contingencies for the different stages of the large construction project. Each stage will require differing levels of planning and engagement.

It is clear that dedicated planners will need to be involved from the outset; the department has already had to dedicate resources during the application stage. The nuclear industry has legislation which results in the department remaining involved for the duration of the life of the Power Station once established. The Department cannot afford to have another projected abstraction for any lengthy period to manage Wylfa Newydd New Build Project without an increase in establishment.

During the construction phase of Wylfa Newydd there will be regular meetings and development of plans, Memorandum of understandings (MOU), policies and procedures. As the phasing develops, there will need to be regular testing and exercising of plans as they change.

It is anticipated that a structure of new liaison meetings at Operational, Tactical and Strategic levels will develop once the build grows in earnest, and the Operational Planning Department will be required to represent the organisation in those fora.

Our liaison with the Hinkley Point Project and Avon and Somerset Police (A&SP) supports the expectation that an additional 2 full time planning officers will be required within the Department. During the process A&SP initially overlooked the operational planning role and the direct needs that their build phase would demand on their Operational Planning Department with regards to the development, maintenance and updating of plans, with their initial focus being around the local policing impact due to the large increase in population during the construction project. Their plans are constantly changing and being reviewed due to the ever changing phases of the development project.

On the basis of the information provided by HNP and the assessment undertaken, the department would require an additional 2 FTE at peak worker scenario to cope with the additional demand and ensure that the development is not at the detriment of NWP or the public of North Wales.

In the long term, once the REPIR plans are in place and the site is a working nuclear site NWP anticipate that the ongoing commitment, as with Wylfa and Trawsfynydd, could be absorbed by the Department.

The full assessment is detailed in Appendix D.

#### 5.4 ROADS POLICING UNIT IMPACT – RPU and Commercial Vehicle Unit

The various stages of the development programme will bring about varying challenges for the Roads Policing Unit (RPU) with each stage requiring differing levels of planning and engagement.

The unit currently operates out of four locations covering the whole of North Wales and support force priorities whilst observing the national roads policing strategy of:

- Reducing road casualties
- Disrupting criminality
- Counterering Terrorism
- Combating anti-social road use
- Patrolling the roads



In conjunction with national policy NWP RPU also adopts a local approach and structure to policing the North-Wales roads and its communities.

RPU retains primacy for some of the work related Health and Safety Executive (HSE) incidents and will also investigate other work related incidents on behalf of the HSE; this is in addition to investigating all fatal and serious injury collisions that occur on the road network within North Wales.

The unit seeks to work in partnership with a number of agencies to reduce road casualties by using the four 'E's' approach to casualty reduction; Education, Engagement, Enforcement and Engineering. In addition the unit has also developed a local road safety enforcement strategy using the National Intelligence Model and academic research that focuses upon the most significant dimensions of unlawful vehicle use, which contribute to avoidable deaths and injury by making collisions more likely, and by making the resultant injuries worse, namely:

- Overarching Strategy
- Fatal 5 Strategy
- Reducing road casualties
- Drink/drug driving
- Disrupting criminality
- Speeding
- Countering Terrorism
- Not wearing a seatbelt
- Combating anti-social road use
- Using a mobile phone
- Patrolling the roads
- Dangerous driving

The unit are successful in reducing demands in relation to fatal and serious collisions on the roads of North Wales, through a robust and accountable casualty reduction strategy. This is achieved through placing preventative measures first and having a proactive and targeted enforcement strategy. A visible policing presence is much needed at the commencement of the build to ensure that the road network integrity and safety is maintained at all times and ensuring that local communities on the Island are reassured that all precatory measures have taken place.

The current service level agreement needs to be maintained and should not be compromised by the additional demands and resourcing that will be required as a result of the new development. The unit must maintain these minimum standards in order to be effective in its policing and ensure a safer road network and maintain public confidence particularly with the local communities of Anglesey during the course of the development. The additional resource within the unit would ensure this.

Roads safety is of paramount importance alongside ensuring that the local communities remain safe and reassured during the duration of the build.

NWP believe that current structure of the RPU will not be able to deal with the demands that will be encountered as a result of the new build. Therefore an increase in establishment will need to be seen within the RPU in order to effectively police the roads on the Isle of Anglesey, the surrounding areas of Gwynedd Local Authority and the A55 corridor.

However at this time NWP is not ready to submit a detailed impact assessment relating to Roads Policing. We are working with our consultants to examine in detail the traffic analysis and assumptions in the DCO application documents.

Therefore any required mitigation measures including additional resources have not been scoped in this report and will be required to be subject to further discussions and agreement including any additional costs.



## 5.5 FORCE CONTROL CENTRE (FCC)

Call Handling staff work 24/7 and are the first point of contact for callers who telephone, text or e mail NWP for assistance and/or its services. It is therefore in the front line of policing, ensuring that local communities receive a quality service.

This section aims to estimate the potential increase in call demand which NWP will experience as a result of an increase in the residential populations in Anglesey and Gwynedd North<sup>7</sup> based on the Peak Worker Scenario.

To estimate the impact of the increase in population on the number of calls into the FCC, a model has been created which uses the relationship between the number of calls and the population levels, at a Force level, to provide an estimate of the expected increase in calls given an increase in the population.

### Model Inputs

Call data covering 101 calls is not made publicly available, but those covering 999 calls are available at Police Force Area level for 2016/17. Call data is not available internally below force area level.

The model therefore uses the number of recorded 999 calls in each Force area in England and Wales, and the population in each corresponding area. The Metropolitan Police have been excluded as an outlier.

### Call Model

The number of 999 calls in each force area when compared to the corresponding population shows a strong positive correlation (+0.96). This indicates that areas with larger populations are highly likely to have correspondingly high levels of 999 calls.

### Call Model Results

Year	Estimated Population in North Wales	Change	Estimated 999 Calls	Increase in 999 calls on 2018
2018	694,973		72,252	
2019	695,473	500	72,347	0.1%
2020	698,173	3200	72,865	0.8%
2021	698,973	4000	73,019	1.1%
2022	700,373	5400	73,288	1.4%
2023 (Peak Worker Scenario)	701,973	7000	73,595	1.9%

The model estimates that an increase of 7000 to the population of North Wales would result in a 1.9% increase in 999 calls.

There is a very strong (+0.9) correlation between the number of 999 calls and the number of 101 calls. Therefore it is assumed that 101 calls would rise by the same proportion as 999 calls, and increase by 1.9%.

### 5.5.1 ESTIMATED IMPACT OF WYLFA NEWYDD

Currently, NWP do not have a resourcing model with which to test the increase in population on Communications Operator resourcing.

At a basic level, we therefore have to assume that there will be a proportionate increase in resource requirement given an increase in calls i.e. a 1.9% increase in calls will require a 1.9% increase in resource. This would ensure the estimated number of calls per operator (overall) remains the same.

<sup>7</sup> The two local policing area Anglesey and Gwynedd North combined cover a similar area to the Key Socioeconomic Area (KSE) defined by Horizon; see Appendix A.



Using this approach, it is estimated that the 1.9% increase in calls at Peak Worker Scenario (keeping all other variables equal) would require an additional 2.0 FTE of Communications Operator resources.

The full assessment is detailed in Appendix F.

**NB.** *In the absence of a resource model, we have not been able to test if the estimated increase in calls would require additional staff at peak times – annual averages have been used.*

## 5.6 CRIME SERVICES, ADMINISTRATION OF JUSTICE, MANAGED RESPONSE UNIT AND INVESTIGATION SUPPORT UNIT

This section relates to the expected impacts of the Wylfa Newydd development on force wide functions. Due to the additional demand created by population being far reaching across the force, amongst smaller teams, and impacting on areas with limited baseline data available (ie. Modern Day Slavery), the approach to the impact on these departments will need to differ from the previous evidence led sections.

The business areas included in this section are as follows:

- **Managed Response Unit (MRU):** The MRU is based within the Force Control Centre in St Asaph and has the principle aim of reviewing slow-time incidents to identify threat, harm, risk and vulnerability, and where appropriate resolving matters without the requirement to deploy an Officer or PCSO.
- **Investigation Support Unit (IST):** IST operates 24/7, 365 days per year dealing predominately with the recording and detecting of crime for the North Wales Police force area.
- **Crime Services:** Crime Services consists of the specialist criminal intelligence and investigation departments, including all aspects of scientific support and forensic recovery. Crime Services staff therefore cover all areas of North Wales and work at all times of the night and day.
- **Administration of Justice Department (AJD):** AJD has responsibility for a broad range of functions which contributes to operational policing and the criminal justice system. These functions include: Collisions, Criminal Justice, Disclosure and Barring Service (CRB), Firearms Licensing, Safety Camera Unit, Witness Care Unit and Police Led Prosecution.

Following consultation with NWP Analysts, it is believed that a standard uplift methodology could be utilised to effectively represent the additional workload for functions that historically have limited data available. This calculation intends to fairly and transparently justify the additional resources in each individual section.

### Method

NWP would apply a percentage increase to the overall department FTE based on the peak worker population growth in relation to current population levels. This additionality on departments as a whole equates to funding requests spread across numerous roles.

The model utilised in this instance estimates that the 7,000 additional population at peak (2023) is approximately a 1% increase on the total population of North Wales (Isle of Anglesey, Gwynedd, Conwy, Denbighshire, Flintshire, Wrexham equate to 695,822, Mid 2016 pop estimates). NWP have reviewed the predicted future population growths across North Wales.

For each department, current FTE has been documented, and 1% has been added to represent the resourcing requirements required at peak worker accommodation in the force area. For clarity, the ramp up and ramp down of population has been included, together with the respective FTE required in each business area.



Population Figures in Draft DCO - Accommodation	Recruitment commences a year before the build									
	500	3200	4000	5400	7000	6566	4260	901	187	
	Estimated Years	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28
	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9
c. Crime Services										
DC	2	2	3	4	4	4	4	3	2	1
Proactive	1	1	1	1	1	1	1	1	1	1
Crime Services Total	3	3	4	5	5	5	5	4	3	2
f. FCC/AJD										
AJD	0	0.5	0.5	1	1	1	1	0.5	0	0
MRU/IST	0	0.5	0.5	1	1	1	1	0.5	0	0
FCC/AJD Total	0	1	1	2	2	2	2	1	0	0

## 5.7 HATE CRIME & COMMUNITY COHESION

NWP has two dedicated Hate Crime Officers that serve the entire force area. These officers deal with the management of hate crime ensuring force policy is adhered to. Each Hate Crime Officer is instructed to make links with the community and with minority groups to understand community cohesion and manage tensions. They also provide a service to the victims of hate crime and manage cases through Victim Support. The potential risk in this area should feature within the Equality Impact Assessment, highlighting the potential increase in hate crime and community cohesion.

The profile of the work force outlined in the DCO documentation is undoubtedly going to change as a large number of external variables will affect the demographic of the work force. With this in mind it is extremely difficult to predict how the workforce will integrate with the local community and therefore the impact cannot be foreseen and NWP are unable to undertake an assessment of the required capability.

Therefore any required mitigation measures including additional resources have not been scoped in this report and will be required to be subject to further discussions and agreement including any additional costs.

## 5.8 IN-LIFE MANAGEMENT – Programme Management & Support

As is evident from the level of detail contained within DCO application and breadth of the Rochdale Envelope principle applied there will be continuous need to monitor, review and implement changes to NWP's operational model both in preparation for and during construction.

In order to achieve this, NWP will require dedicated members of staff to coordinate and manage the change. These roles will have responsibility for the internal and external liaison, both with HNP, its contractors and other partner agencies, ensuring NWP internal governance is adhered to and producing and maintaining long term plans.

## 5.9 TRAINING

There is a significant uplift in staff numbers across Years 0-4. Each new officer requires:

- Nine months initial training input which includes a three week standard driving course. The College of Policing is introducing the PEQF (Policing Education Qualifications Framework) which is a new, professional framework for the training of police officers and involves three separate entry routes which takes upwards of three years completion dependent on the entry route but are signed off as able to go on independent patrol after twelve months.

In Years 0-4 a total of between three and five trainers are required to meet the training requirements as the total number of staff ramps up to its maximum levels. The number of trainers required thereafter reduces as requirement will be to provide the requisite refresher training in each are of business.



## 5.10 OVERHEADS

An increase in the number of staff will lead to additional non staff (overhead) costs being incurred such as overtime, uniform, equipment, IT, Facilities & Vehicle running costs, subsistence as well as requiring back office support from functions such as HR, Finance, IT Force Command etc.

In deriving an appropriate overhead percentage three separate models were looked at:

- NPCC Guidelines for Charging for Police Services – The Direct and Indirect Overheads for a Constable being in excess of 99%.
- Police Objective Analysis – On an annual basis all police forces submit a Police Objective Analysis return to the Chartered Institute of Public Finance & Accountancy (CIPFA) showing the level of proposed investment in frontline, middle and back office functions. An overhead % can be derived by taking the investment in back office (support functions) and non-staff and dividing by the investment in frontline and middle office functions. The % based on the 18/19 budget was 39.10%.
- A simple measure which takes the 18/19 budget and dividing the non-staff as proportion of staff budgets while recognising that the staff budgets includes back office functions such as HR, Finance and IT. The % based on 18/19 budget being 30.86%.

A decision was taken that the simple measure at 30% should be applied as it is pragmatic reflection of the overhead costs

## 6. CAPITAL REQUIREMENTS

Capital investment in infrastructure is required to support the core policing broken down into four main elements:

- Facilities
- Vehicles
- IT

The total investment required over years 0-9 is £1,069k with all costs based on current 2018-19 costs:

	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Total
Function	£k	£k	£k	£k	£k	£k	£k	£k	£k	£k	£k
a. Facilities	683	0	0	0	0	0	0	0	0	0	683
b. Vehicle Costs	76	17	26	17	41	66	15	0	0	0	259
c. IT Infrastructure	45	28	6	12	27	3	6	0	0	0	127
<b>Total Costs</b>	<b>804</b>	<b>45</b>	<b>32</b>	<b>29</b>	<b>68</b>	<b>69</b>	<b>21</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1069</b>

The assumptions which underpins each of the requirements being as follows:

### a. Facilities

In order to accommodate the required additional Local Policing resources NWP's Facilities & Fleet Department have undertaken a feasibility study and reviewed a number of options. Based on the operational requirements predicted, Amlwch was chosen as the preferred location.

The options reviewed included existing buildings, for purchase or rental, land and current NWP estate including extending current properties.

The feasibility study concluded that the most appropriate and cost effective outcome was using land that was already part of the NWP estate and to a build a new police station.

The estimated capital cost for this option is £683,300.00.

**b. Vehicles**

Three separate types of vehicles will required to be purchased:

- LPS Peugeot Marked Vehicles with a Replacement Cycle of four years
- Training BMW
- Plain Peugeot 208 with a Replacement Cycle of five years

The following functions require the following vehicles:

- LPS Peugeot Marked – Response
- Training BMW
- Plain Peugeot 208 - Local CID, PCSO, Crime Services, Operational and Emergency Planning etc.

The following table highlights:

- Initial Purchase of Vehicles as number of North Wales Police staff increases (Years 0-4)
- Replacement Vehicles based on replacement cycle but having due cognisance of reduction in North Wales Police staff number in Years 7-9

	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9
<b>Initial Vehicles Purchased</b>										
LPS Marked Peugeot 308	1	1	1	1	1	0	0	0	0	0
Training BMW	1	0	0	0	0	0	0	0	0	0
Plain Peugeot 208	2	0	1	0	1	0	0	0	0	0
<b>Initial Vehicles Purchased</b>	<b>4</b>	<b>1</b>	<b>2</b>	<b>1</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Replacement Vehicles</b>										
LPS Marked Peugeot 308	0	0	0	0	1	1	1	0	0	0
Training BMW	0	0	0	0	0	1	0	0	0	0
Plain Peugeot 208	0	0	0	0	0	2	0	0	0	0
<b>Replacement Vehicles</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>4</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Overall Vehicles Purchased</b>	<b>4</b>	<b>1</b>	<b>2</b>	<b>1</b>	<b>3</b>	<b>4</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Total Vehicles Available</b>	<b>4</b>	<b>5</b>	<b>7</b>	<b>8</b>	<b>10</b>	<b>10</b>	<b>10</b>	<b>8</b>	<b>7</b>	<b>5</b>

LPS Marked Peugeot aligned to number of Response Officer including those at Supervisory rank

**c. IT**

IT costs predicated on £1,500 per member of staff for Laptop/Desktop/Tablet, Airwave Radios, Mobiles etc.

IT currently has a four year replacement programme with cost of £1,500 per year built in from Year 5 but having due cognisance of reduction in North Wales Police staff number in Years 7-9.

IT Infrastructure cost of £50k.

## 7. ROADS POLICING UNIT (RPU) IMPACT – ABNORMAL LOADS

A number of HGV and abnormal loads are expected in the early stages of the development which would require the intervention of the RPU in aspects of enforcement and safe movement of any Abnormal Indivisible Loads (AILs). There is a requirement under the Road Vehicles (Authorisation of Special Types)(General) Order 2003 that before the start of any journey by vehicles under these regulations the police must be notified and the police can ensure the vehicle is accompanied by attendants. North Wales Police provides trained escorts.

It is unclear how many abnormal indivisible loads are required as part of the build. Policy states that only a maximum of two AIL's can be escorted during any given day, this being dependant on the point of collection (e.g. point of collection Anglesey equates to 2 movements per day, point of collection from Cheshire border equates to 1 movement per day.) All movements will be carried out in line with policy between the hours of 08:00-09:00 and 16:30-18:00hrs during weekdays.

We are aware that currently at Hinkley Point C Avon and Somerset RPU are escorting two Abnormal Indivisible Loads (AIL's) a day and this falls outside of the peak period of development and numbers are expected to increase.



A number of abnormal indivisible loads movements are mentioned but it is undetermined how many will require a police escort.

Any Abnormal Load over 2.9m wide must be notified to the Police within the area of that movement, unless there is a dispensation in place. Two clear working days (including Saturdays) notification is required.

A risk assessment is necessary to determine what type of escort an abnormal load requires, whether it is police or private sector.

Without being furnished with details of the Wylfa Newydd Abnormal Load movement plan, it is difficult to forecast the exact number of abnormal load movements that will take place over the project build of Wylfa Newydd.

There are two options available to deal and resource with movement of ALLs that require a police escort.

#### **Option A: Dedicated Abnormal Loads Team**

This option would see a dedicated Abnormal Loads Team which would consist of 1 Sergeant and 6 Police Constables, 5 of which are required to be a motorcyclist.

The team would be dedicated in the movement of any abnormal indivisible load required as part of the Wylfa Newydd work, on and off site. If the team was to be fully formulated there would be no additional cost attributed to the Wylfa Newydd project for any AIL's movement. In addition the Abnormal Loads Team would require the support of an additional police staff post to administer the vast movements associated with the build.

Any down time during the initial stages will be used to provide a visible policing presence along the key strategic networks identified within the deployment plan.

The total annual cost for the Dedicated Team is £608,368 which is predicated on moving of abnormal loads for a maximum of 200 days per annum.

If abnormal loads are required in excess of 200 days there are marginal cost relating to Fuel, Subsistence, Overtime etc. at an additional cost of circa £350 per day

#### *Assumptions*

Force will need to commence recruitment of officers some eighteen months prior to requirement being established, made up of six months recruiting and twelve months training (these will displace officers coming onto the Abnormal Loads unit).

The cost are based on the 2018/19 prices and will need to be uplifted for inflation.

Assume 10% of loads with require overtime element (4 hours).

#### **Option B: Cost per day**

The movement of any abnormal indivisible loads under police escort costs £5,126 per day<sup>8</sup>

## **8. CONTINGENCY / INTANGIBLE IMPACTS**

While every effort has been made to quantify the impacts the Wylfa Newydd development will have on NWP it is inevitable that there will be additional and/or unforeseen impacts, which are both tangible and intangible\*, that develop throughout the course of construction.

In order to ensure that these impacts do not have an adverse effect on NWP and ultimately the communities it serves a contingency/intangible impacts fund will need to be established. NWP would suggest that this fund is linked to the yearly costs and be available on draw down basis as required.

<sup>8</sup> Policy states that only a maximum of two ALL's can be escorted during any given day, this being dependant on the point of collection (e.g. point of collection Anglesey equates to 2 movements per day, point of collection from Cheshire border equates to 1 movement per day.) All movements will be carried out in line with policy between the hours of 08:00-09:00 and 16:30-18:00hrs during weekdays.



*\*\*A residual and intangible impact is typically one that is difficult or impossible to measure but is (or likely to be) felt or experienced by people, their community or in their local environment after other mitigation measures have been put in place.*

Ref: Hinkley Point C Community Fund <https://www.somersetcf.org.uk/edf>

## 9. MARINE OFF LOAD FACILITY (MOLF)

The MOLF is required to facilitate the construction of Wylfa Newydd.

The marine facilities would encompass two purpose-built quays with mooring dolphins for use as bulk berths, and a Roll-on Roll-off (Ro-Ro) berth. These would be located in Porth-y-Pistyll, directly to the south-west of the existing power station.

Construction is planned to take two years with completion due at the start of the third year of the overall construction timeline. Once completed it will operate 24 hours a day, 365 days of the year with an upper daily limit of 16 movements per day (eight vessels).

Ports Policing in North Wales is delivered through North Wales WECTU (Welsh Extremism and Counter Terrorism Unit).

WECTU is a collaboration of the four Welsh Police Forces. The current North Wales WECTU Borders team are committed 24/7-to the two million plus annual passenger movements through Holyhead Port. There is not the capacity to take on significant extra duties without removing resources necessary to complete core duties.

Current expectations are that officers accredited under the Terrorism Act (TACT) 2000 board vessels of interest identified by National Maritime Operations Centre (NMOC) and examine crew members.

In addition crew members going ashore are frequently reported on to ensure their transit or presence in country is not abused. There is already some crew transfer going on in Anglesey with vessels waiting at anchor off Moelfre for Liverpool. Crew transfer may be very significant if many vessels are berthing.

Border officers are expected within their role to meet the other expectations in relation to crime where necessary.

The DCO application contains very little detail on the operation of the MOLF.

This lack of detail and the uncertainty as to the frequency, ports of origin, crew numbers and nationalities that will use the MOLF means that NWP are unable to undertake an assessment of the required capability.

Therefore any required mitigation measures including additional resources have not been scoped in this report and will be required to be subject to further discussions and agreement including any additional costs.

## 10. PROTEST

It is probable that the Wylfa Newydd project will attract protest activity from both local and international groups. Facilitating the right to peaceful protest, keeping roads and highways open, protecting the public and preventing crimes occurring are all the responsibility of the police.

The experience from other nationally significant developments has shown that should protests occur and become protracted the resulting impact on both the local police and bordering forces can be extremely detrimental both in terms of resourcing and finance. Although Hinkley Point has seen limited protest activity to date they believe this will change during critical build stages.

If protest (lawful or unlawful) occurs against the development NWP could see an unsustainable increase in demand for its resources. Consideration needs to be given to the recruitment and retention of additional specialist skilled officers to support any protest activity. NWP do not have a marine capability to deal with protestor action at sea or within the coastal waters.

Long term protracted protests would place a significant burden on NWP and as a Force we would not be able to sustain for any period without the assistance of mutual aid which places an additional significant increase in the cost for policing any protests.

Protest is not considered within the scope this report. Consideration will need to be given to this area of policing and a separate agreement sought with HNP.



## 11. SUMMARY OF IMPACT (including FINANCIALS)

The below tables detail the number and cost of the required resourcing over the life of the development:

### Core Policing Resourcing Requirement – FTE

Function	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9
a. Local Policing	3	6	9	13	17	17	17	9	3	3
b. Custody	0	0	0	0	1	1	1	0	0	0
c. Operational and Emergency Planning	1	1	1	2	2	2	2	2	1	1
e. Force Control Centre	1	1	1	2	2	2	2	1	1	0
f. Managed Response Unit	0	0.25	0.25	0.5	0.5	0.5	0.5	0.25	0	0
g. Investigation Support Unit	0	0.25	0.25	0.5	0.5	0.5	0.5	0.25	0	0
h. Crime Services	3	3	4	5	5	5	5	4	3	2
i. Administration of Justice	0	0.5	0.5	1	1	1	1	0.5	0	0
j. Programme Management and Support	2	2	2	2	2	2	2	2	2	2
k. Training	3	1	1	1	1	1	1	1	1	1
<b>Total Core Policing Requirement FTE</b>	<b>13</b>	<b>15</b>	<b>19</b>	<b>27</b>	<b>32</b>	<b>32</b>	<b>32</b>	<b>20</b>	<b>11</b>	<b>9</b>



Core Policing Resourcing Requirement - £k

	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Total
Function	£k	£k	£k	£k	£k	£k	£k	£k	£k	£k	£k
a. Local Policing	154	281	408	583	768	768	768	408	154	154	4,444
b. Custody	0	0	0	0	41	41	41	0	0	0	122
c. Operational and Emergency Planning	48	48	48	96	96	96	96	48	48	48	717
e. Force Control Centre	36	36	36	73	73	73	73	36	36	0	473
f. Managed Response Unit	0	8	8	15	15	15	15	8	0	0	85
g. Investigation Support Unit	0	8	8	15	15	15	15	8	0	0	85
h. Crime Services	143	143	191	239	239	239	239	191	143	96	1,865
i. Administration of Justice	0	15	15	30	30	30	30	15	0	0	164
j. Programme Management and Support	96	96	96	96	96	96	96	96	96	96	956
k. Training	143	48	48	48	48	48	48	48	48	48	574
<b>Resourcing Costs £k</b>	<b>621</b>	<b>682</b>	<b>857</b>	<b>1,194</b>	<b>1,420</b>	<b>1,420</b>	<b>1,420</b>	<b>905</b>	<b>525</b>	<b>441</b>	<b>9,485</b>
Overheads @ 30%	186	205	257	358	426	426	426	271	157	132	2,845
Exit Costs								142	142	142	426
<b>Total Costs £k</b>	<b>807</b>	<b>887</b>	<b>1,114</b>	<b>1,553</b>	<b>1,846</b>	<b>1,846</b>	<b>1,846</b>	<b>1,318</b>	<b>824</b>	<b>715</b>	<b>12,756</b>



Core Policing Resourcing Requirement - £k - Cumulative Costs

Function	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9
Function	£k	£k	£k	£k	£k	£k	£k	£k	£k	£k
a. Local Policing	154	435	843	1,425	2,193	2,961	3,729	4,137	4,291	4,444
b. Custody	0	0	0	0	41	81	122	122	122	122
c. Operational and Emergency Planning	48	96	143	239	335	430	526	622	669	717
e. Force Control Centre	36	73	109	182	255	327	400	436	473	473
f. Managed Response Unit	0	8	15	31	46	62	77	85	85	85
g. Investigation Support Unit	0	8	15	31	46	62	77	85	85	85
h. Crime Services	143	287	478	717	956	1,195	1,435	1,626	1,769	1,865
i. Administration of Justice	0	15	30	60	90	119	149	164	164	164
j. Programme Management and Support	96	191	287	382	478	574	669	765	860	956
k. Training	143	191	239	287	335	383	430	478	526	574
<b>Resourcing Costs £k</b>	<b>621</b>	<b>1,303</b>	<b>2,160</b>	<b>3,354</b>	<b>4,774</b>	<b>6,194</b>	<b>7,614</b>	<b>8,519</b>	<b>9,044</b>	<b>9,485</b>
Overheads @ 30%	186	391	648	1,006	1,432	1,858	2,284	2,556	2,713	2,845
Exit Costs	0	0	0	0	0	0	0	142	284	426
<b>Total Costs £k</b>	<b>807</b>	<b>1,694</b>	<b>2,808</b>	<b>4,360</b>	<b>6,206</b>	<b>8,052</b>	<b>9,898</b>	<b>11,217</b>	<b>12,041</b>	<b>12,756</b>

Core Policing Capital Requirement - £k

Function	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Total
	£k	£k	£k	£k	£k	£k	£k	£k	£k	£k	£k
a. Facilities	683	0	0	0	0	0	0	0	0	0	683
b. Vehicle Costs	76	17	26	17	41	66	15	0	0	0	259
c. IT Infrastructure	45	28	6	12	27	3	6	0	0	0	127
<b>Total Costs</b>	<b>804</b>	<b>45</b>	<b>32</b>	<b>29</b>	<b>68</b>	<b>69</b>	<b>21</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1069</b>

Combined Costs - £k - Cumulative

Function	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Total
	£k	£k	£k	£k	£k	£k	£k	£k	£k	£k	£k
Core Policing Resourcing Requirements	807	887	1,114	1,553	1,846	1,846	1,846	1,318	824	715	12,756
Capital/One Off Requirements	804	45	32	29	68	69	21	0	0	0	1,069
<b>Total</b>	<b>1,611</b>	<b>932</b>	<b>1,146</b>	<b>1,582</b>	<b>1,914</b>	<b>1,915</b>	<b>1,867</b>	<b>1,318</b>	<b>824</b>	<b>715</b>	<b>13,825</b>
Resourcing FTE Requirements	13	15	19	27	32	32	32	20	11	9	



## 12. BACKGROUND PAPERS

[Appendix A - Local Policing Services Impact](#)

[Appendix B - Facilities and Fleet Impact](#)

[Appendix C - Custody Impact](#)

[Appendix D - Operational and Emergency Planning Impact](#)

[Appendix E – Road Policing Impact](#)

**TO FOLLOW AT DEADLINE 3**

[Appendix F –Force Control Centre Impact](#)

[Appendix G – Contributors List](#)



**HEDDLU GOGLEDD CYMRU**

Gogledd Cymru diogelach

**NORTH WALES POLICE**

A safer North Wales

# **Wylfa Newydd Impact Assessment**

## **Local Policing Services**



## 1. INTRODUCTION

Horizon Nuclear Power Ltd. (Horizon) is planning to develop a new nuclear power station at Wylfa, Anglesey as identified in the National Policy Statement for Nuclear Power Generation (EN-6). It is estimated at the peak of the build there will be as many as 9000 workers required, 2000 of which will be local residents with the remaining 7000 imported labour.

## 2. PURPOSE OF REPORT

This report aims to estimate the potential increase in demand (reported crime and incidents) North Wales Police will experience as a result of an increase in the residential populations in Anglesey and Gwynedd North<sup>1</sup> due to the Wylfa Newydd development, based on the Peak Worker Scenario.

To estimate the impact of the increase in population on the number of reported crimes and incidents two models have been created:

- **Crime Model:** This model uses the relationship between the number of crimes and the population levels, at a local authority area level, to provide an estimate of the expected increase in reported crime given an increase in the population.
- **Incident Model:** This model uses the relationship between the number of incidents and the population levels, at a local authority area level, to provide an estimate of the expected increase in reported incidents given an increase in the population.

## 3. EXECUTIVE SUMMARY

In Wales there is a strong positive correlation between population and reported incidents and crime; meaning areas with larger populations experience more reported incidents and crime.

Models based on this principle show the estimated population increase of 7000 at the point of the Peak Worker Scenario in 2023 as defined by Horizon is likely to result in a 7.8% increase in crime and a 6.1% increase in reported incidents.

A resource allocation model based on the predicted increase in demand shows at the point of the Peak Worker Scenario there will be a requirement for an additional 9 PC/DCs and 2 PCSOs in the Anglesey and Gwynedd North area. This is intended to reflect the expected increase in demand due to the increase in population alone and does not reflect the impact of any additional policing activities related to the development.

## 4. MODELS INPUTS

The models use the following inputs:

- **Crime Model:** The population in each local authority area in Wales and the number of reported crimes in each corresponding area.
- **Incident Model:** The population in each local authority area in Wales and the number of reported incidents in each corresponding area.

### Source of Inputs for Models

1. North Wales Police incident data has been obtained from ICAD via Business Objects.
2. North Wales Police crime data has been obtained from RMS via Business Objects.

<sup>1</sup> The two local policing area Anglesey and Gwynedd North combined cover a similar area to the Key Socioeconomic Area (KSE) defined by Horizon; see Appendix A.



3. Crime data for the local authority areas in Wales has been obtained from the Home Office reported on recorded crime published in July 2017 on the website IQuanta.
4. Incident data for the local authority areas in Wales has been obtained directly from Dyfed Powys, South Wales and Gwent Police via the relevant analysts.
5. Population estimates for mid-2016 for local authorities in Wales has been obtained from the Office for National Statistics.
6. Estimated population increases have been obtained from the Wylfa Newydd Project: Technical Note: Home Based and Non-Home Based Worker Travel Gravity Models.

## 5. MODEL LIMITATIONS

The models are only intended to estimate the number of crimes or incidents for populations within the population range used to create the models, 59,810 to 361,468.

## 6. CRIME MODEL

The number of reported crimes in each local authority area when compared to the corresponding population shows a strong positive correlation (+0.93). This indicates that areas with larger populations are highly likely to have correspondingly high levels of crime.

**Crime Model** = 0.0895512\* Population + (-3591.74)

The R<sup>2</sup> value for this model is 0.86 indicating that the number of reported crimes in a local authority area is mostly explained by the size of the population. The P value of <0.0001 shows the result to be significant, see Appendix B.

### Crime Model Results

Year	Estimated Population in Anglesey and Gwynedd North	Estimated Population Increase	Estimated Crime	Increase in crime on 2018
2018	130060		8055	
2019	130560	500	8100	0.6%
2020	133260	3200	8342	3.6%
2021	134060	4000	8413	4.4%
2022	135460	5400	8539	6.0%
2023 (Peak Worker Scenario)	137060	7000	8682	7.8%

The model estimates that an increase of 7000 to the population in Anglesey and Gwynedd North would result in a 7.8% increase in crime.

## 7. INCIDENT MODEL

The number of reported incidents in each local authority area when compared to the corresponding population shows a strong positive correlation (+0.95). This indicates that areas with larger populations are highly likely to have a correspondingly high levels of incidents.

**Incident Model** = 0.314553\* Population + (-4884.09)



The  $R^2$  value for this model is 0.89 indicating that the number of reported incidents in a local authority area is mostly explained by the size of the population. The P value of <0.0001 shows the result to be significant, see Appendix C.

### Incident Model Results

Year	Estimated Population in Anglesey and Gwynedd North	Estimated Population Increase	Estimated Crime	Increase in incidents on 2018
2018	130060		36027	
2019	130560	500	36184	0.4%
2020	133260	3200	37033	2.8%
2021	134060	4000	37285	3.5%
2022	135460	5400	37725	4.7%
2023 (Peak Worker Scenario)	137060	7000	38229	6.1%

The model estimates that an increase of 7000 to the population in Anglesey and Gwynedd North would result in a 6.1% increase in reported incidents.

## 8. IMPACT ON RESOURCES

The predicted increases in crime and incidents have been fed through a resource model in order to estimate the additional resources required to deal with the additional demand.

A Resource Allocation Model for Policing was created for the Anglesey and Gwynedd North area, which reflects current demand and current resources for the area.

The model inputs include:

- Incidents
- Crime and non-crime occurrences
- Unplanned events such as missing person searches, scene guards and hospital watch
- Abstraction rates
- Time spent on other tasks, such as briefings, refs and mobile patrol

The model estimates that the 7.8% increase in crime and 6.1% increase in incidents and non-crimes (keeping all other model inputs equal) would require an additional 9 constables and 2 PCSOs, which represents a 6.5% increase in resources compared to original model outputs.

Year	Increase in crime on 2018	Increase in incidents on 2018	PC/DC requirement	PCSO requirement	PC/DC increase required	PCSO increase required
2018					-	-
2019	0.6%	0.4%	130	41	1	0
2020	3.6%	2.8%	132	41	3	0
2021	4.4%	3.5%	134	41	5	0
2022	6.0%	4.7%	136	42	7	1
2023	7.8%	6.1%	138	43	9	2



Additional Requirement identified by Western SMT										
Year	Increase in crime on 2018	Increase in incidents on 2018	PC/DC requirement	PCSO requirement	PC/DC increase required	PCSO increase required	PC/DC	PS	PCSO	Total
2018					-	-				
2019	0.6%	0.4%	130	41	1	0	1	1	0	3
2020	3.6%	2.8%	132	41	3	0	1	1	1	6
2021	4.4%	3.5%	134	41	5	0	1	1	2	9
2022	6.0%	4.7%	136	42	7	1	2	1	2	13
2023	7.8%	6.1%	138	43	9	2	2	2	2	17

In order to achieve the staffing levels detailed above, recruitment for roles would have to occur in advance of the requirement/demand. The table below details how this ramp up and down would occur.

Population Figures in Draft DCO - Accommodation	Recruitment commences a year before the build									
	500	3200	4000	5400	7000	6566	4260	901	187	
	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29
Estimated Years	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9
a. Local Policing										
Sergeant	1	1	1	1	2	2	2	1	1	1
Constable	2	4	6	9	11	11	11	6	2	2
PCSO		1	2	3	4	4	4	2		
Local Policing Total	3	6	9	13	17	17	17	9	3	3



## 9. APPENDICES

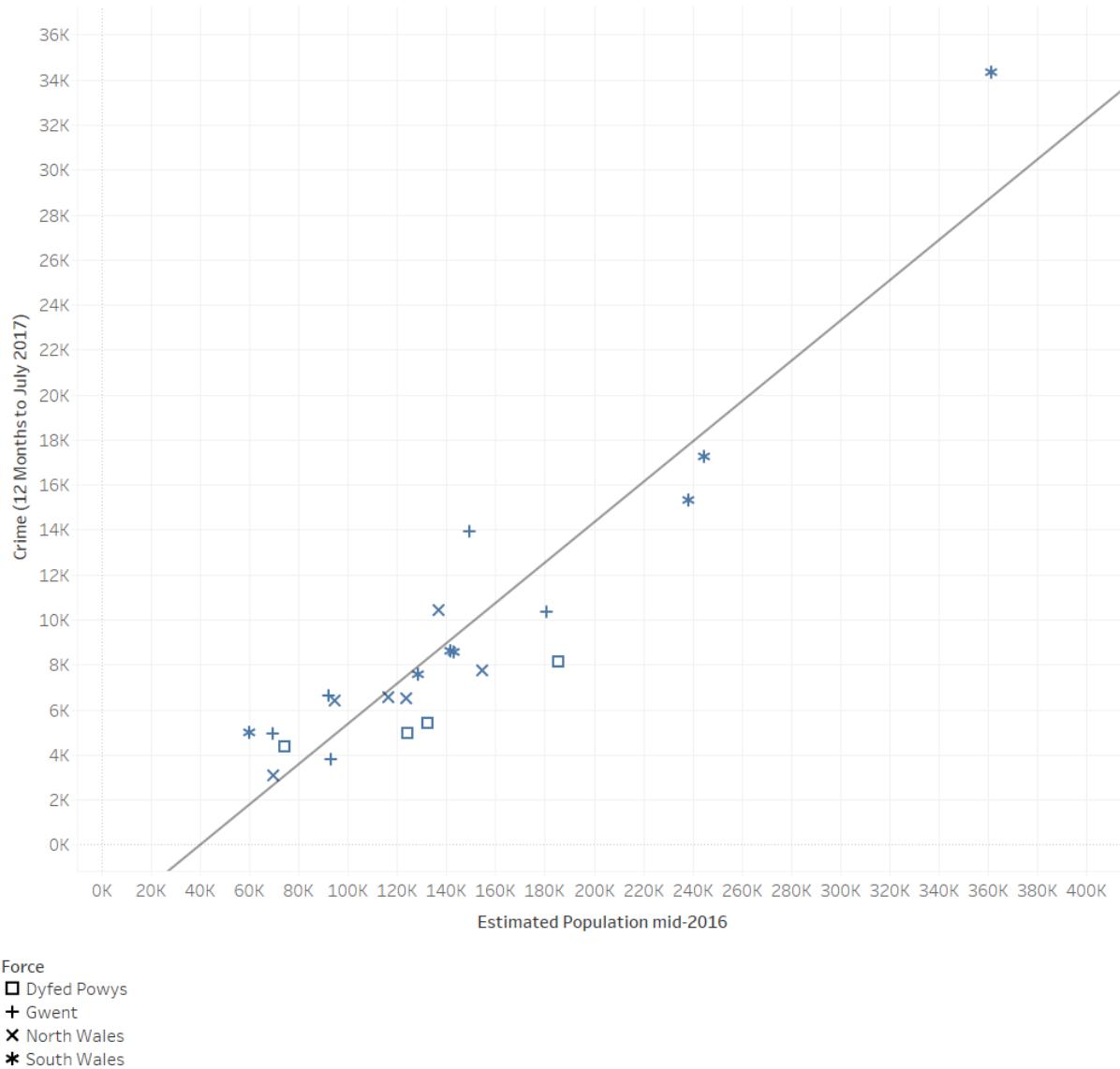
### Appendix A – Anglesey and Gwynedd North Area





## Appendix B – Crime Model

### Recorded Crime Vs Population by Local Authority Areas in Wales



**P-value:** < 0.0001

**Equation:** Crime = 0.0895512\* Estimated Population + ( -3591.74)

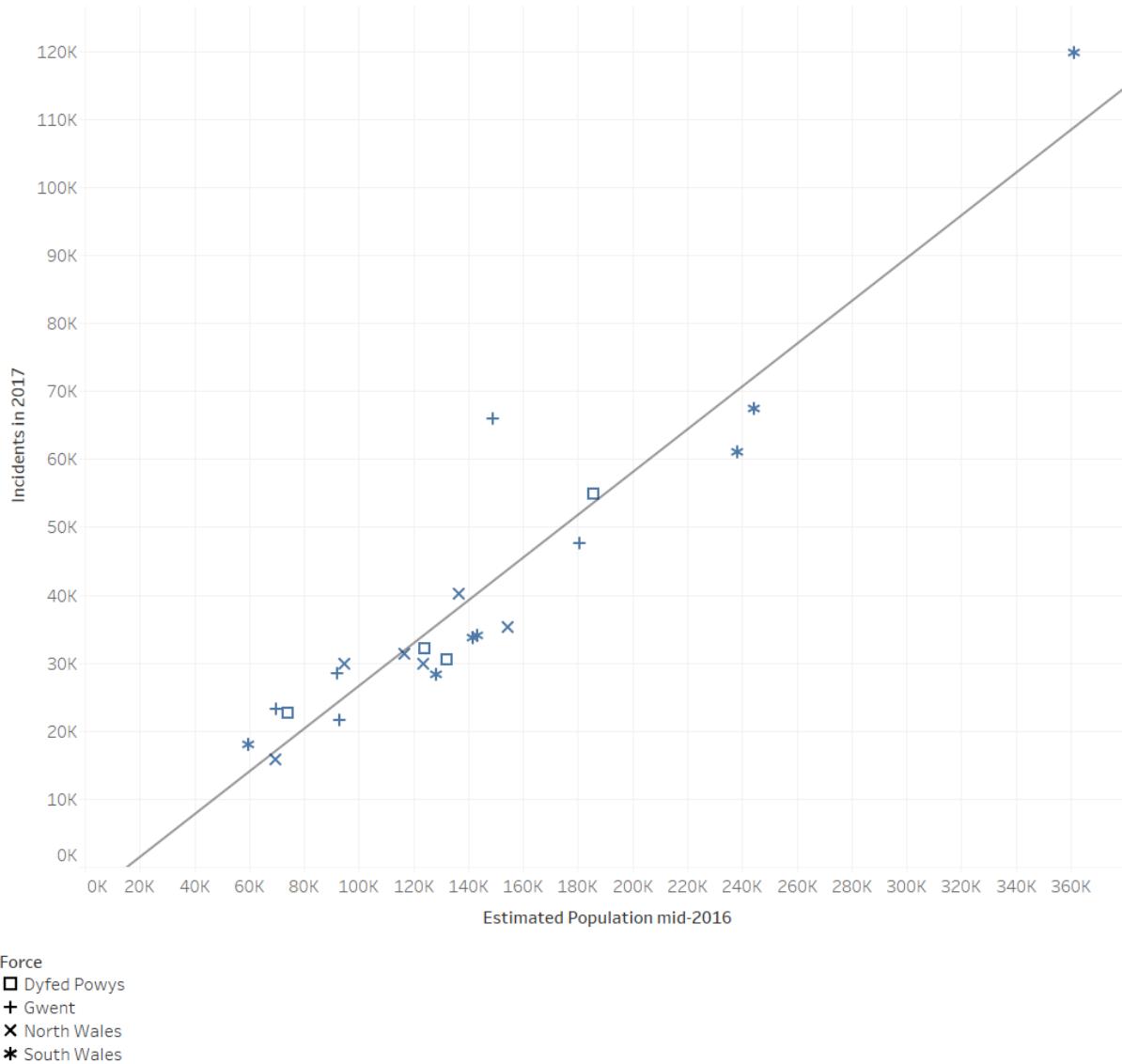
#### Coefficients

Term	Value	StdErr	t-value	p-value
Estimated Population	0.0895512	0.0081206	11.0276	< 0.0001
intercept	-3591.74	1275.37	-2.81623	0.0106669



## Appendix C – Incident Model

Reported Incidents Vs Population by Local Authority Areas in Wales



**P-value:** < 0.0001

**Equation:** Incidents = 0.314553\*Estimated Population + (-4884.09)

### Coefficients

Term	Value	StdErr	t-value	p-value
Estimated Population	0.314553	0.0242699	12.9606	< 0.0001
intercept	-4884.09	3811.66	-1.28135	0.214727

## ESTIMATED COST PLAN

**Project: Wylfa Newydd Amlwch Police Station**  
**Works : New building**



Estimated Cost		
<b>1 Site Costs</b>		
1.1 Legal Costs and Stamp Duty		£2,500
1.2 Site Investigation and/or Structural Survey		£3,000
1.3 cctv drainage survey		£750
	<b>sub total</b>	<b><u>£6,250</u></b>
<b>2 Professional Fees</b>		
2.1 Architect incl structural eng (RIBA 0-2)	5	£20,000
2.2 M&E Consultant		£12,000
2.3 Quantity Surveyor		£10,000
2.4 Planning Supervisor		£5,000
2.5 COW		£10,000
2.6 UCML		£4,500
2.7 Lift Consultant		£5,000
2.8 contracts		£200
	<b>sub total</b>	<b><u>£66,700</u></b>
<b>3 Statutory Fees</b>		
3.1 Planning Application		£5,000
3.2 Building Control - Plans		£10,000
3.3 Building Control - Inspections		£1,000
	<b>sub total</b>	<b><u>£16,000</u></b>
<b>4 Utilities</b>		
4.1 - Electric		£20,000
4.2 - Water & Sewerage		£10,000
4.3 - Gas		£10,000
4.4 - Telephone/Comms Supply		£2,000
	<b>sub total</b>	<b><u>£42,000</u></b>

<b>5</b>	<b><i>Construction Cost</i></b>	
5.1	Building Works	£400,000
5.2	Air Tightness Testing.	£3,000
5.3	Furniture	£15,000
5.4	Lockers	£10,000
5.5	Window Blinds	£5,000
5.6	White Goods	£3,000
5.7	Fire Extinguishers	£2,000
5.8	Signage	£1,000
5.9	Induction Loops & Panic Alarms	£10,000
5.10	Car Park	£6,000
5.11	New directional signs	£3,000
5.12	chilled water machines	£500
5.13	tubs	£500
5.14	airwaves relocation	£1,500
5.15	recycling centre	£1,000
5.16	accessible toilet items	£800
5.17	evac chairs	£1,200
5.18	post box	£500
5.19	car hoover/car wash	£1,500
5.20	corner protectors	£800
5.21	folder holders	£50
5.22	first aid boxes	£100
5.23	official opening plaque	£800
5.24	key safe	£100
	<b>sub total</b>	<b><u>£467,350</u></b>
<b>6</b>	<b><i>IT &amp; Communications</i></b>	
6.1	2 new circuits	
6.2	new network kit	
6.3	BT ducts	
6.4	Booking systems	
6.5	relocations costs	
6.6	New outside phone	
6.7	Airwaves booster set	£50,000
	<b>sub total</b>	<b><u>£50,000</u></b>
<b>7</b>	<b><i>Other Contracts</i></b>	
7.1	Landscaping	£2,000
7.2	Racking	£1,500
7.3	Relocation Costs - Removalists	£1,500
	<b>sub total</b>	<b><u>£5,000</u></b>
	<b>sub total</b>	<b><u>£653,300</u></b>
<b>8</b>	<b><i>Contingencies</i></b>	
8.1	Contingencies	£30,000
8.2	Increased costs	£0
	<b>Estimated Total Capital Cost</b>	<b><u>£683,300</u></b>

**COST COMMITTED  
RETENTIONS**  
30.09.18  
Over/Under Budget



# Wylfa Newydd Impact Assessment

## Custody

**Author:** [REDACTED]  
**Date:** 30/08/2019  
**Version Number:** 1.0



## 1. INTRODUCTION/BACKGROUND

Horizon Nuclear Power Ltd. (Horizon) is planning to develop a new nuclear power station at Wylfa, Anglesey as identified in the National Policy Statement for Nuclear Power Generation (EN-6). It is estimated at the peak of the build there will be as many as 9,000 workers required, 2,000 of which will be local residents with the remaining 7,000 imported labour.

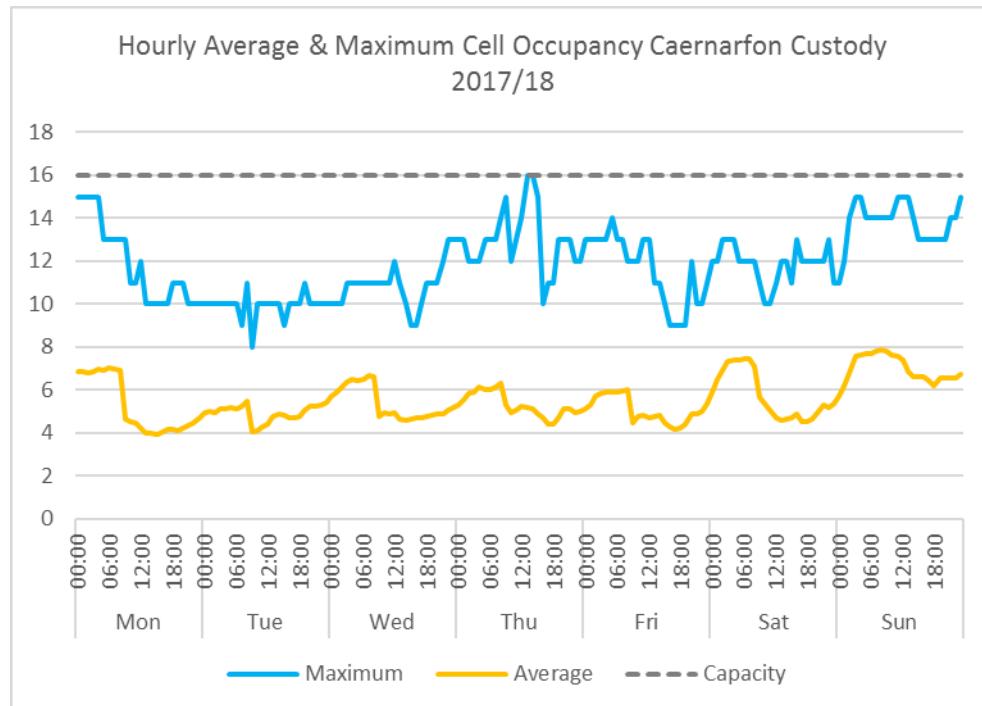
## 2. SCOPE

This report aims to estimate the potential increase in Custody demand experienced as a result of the increase in the residential populations in Anglesey and Gwynedd North due to the Wylfa Newydd development.

It is assumed that the impact on the custody function will be limited to that on Caernarfon Custody as the only active custody suite in the West.

## 3. Current Demand

- Current planned establishment for Caernarfon Custody is 10 sergeants and 7 custody detention officers (CDOs), with a desirable staffing level (DSL) of 2 sergeants and 1 CDO.
- There were 3,245 detentions in Caernarfon Custody in 2017/18, and the average length of detention (excluding hospital absences and bail backs) was 12.8 hours.
- Caernarfon Custody has 16 cells, and displayed a cell occupancy rate of 34.5% in 2017/18. Cell capacity was reached on one occasion for a period of two hours in August 2017.
- Cell occupancy is variable through the week, with peak demand following Friday and Saturday nights.





## “As-is” Resource Model

An “as-is” utilisation model for custody has been built which seeks to mimic custody demand and staff utilisation. This “as-is” model has been used as a baseline for testing how the increase in population is likely to affect resourcing in Custody.

The model considers the demand from four key types of tasks:

- **Regular Tasks**

These are tasks which need to be conducted at regular frequencies, but are not related to a particular time of day. These include weekly cell checks, welfare checks, providing drinks and staff breaks.

- **Fixed Time Tasks**

These are tasks which are conducted at (roughly) a set time of day, and include meals and handovers.

- **Detainee Tasks**

These are tasks which will occur as and when a detainee is brought into custody, and are unrelated to a particular time of day. For example, booking in, searches, samples or booking out.

- **Non-Time Bound Tasks**

Non-time bound tasks are generally housekeeping type activities, which are not related to when a detainee comes into custody and which do not need to be completed at a specific time of day. This implies that non-time bound tasks will be completed as and when staff have spare capacity across their shift. These include custody record audits, stock checks, cleaning the kitchen and the custody task pot.

The model for Caernarfon Custody estimates that the average utilisation rates are 62.2% for sergeants and 98.3% for CDOs.

## Arrests Model

An incident-population model estimates that an increase of 7,000 to the population in Anglesey and Gwynedd North would result in a 6.1% increase in reported incidents.<sup>1</sup>

In the last 12 months, the average number of first arrests per incident was 0.08, and this has been a relatively consistent ratio for the past 3 years. *NB. The term first arrest is here used to represent the number of detentions excluding bail backs.*

We can therefore assume that any increase in incidents would have a proportionate increase in the number of first arrests, with associated increases in the number of bail backs and subsequently, the total number of detentions:

*Estimated Number of Detentions at Peak Worker Scenario*

	2017/18	Estimated Peak Worker Scenario
Total Detentions	2,747	2,915
First Arrests	2,671	2,834
Bail backs	76	81

For staff utilisation, the effect of any increase in detentions has then been assumed to be:

<sup>1</sup> “Impact of Population Changes on Demand and Resources – Wylfa Newydd”

- An increase in the volume of detainee related tasks
- An increase in the time taken to conduct some regular and fixed time tasks (those which are related to the number of detainees in custody, such as meals and welfare checks)
- Insignificant on housekeeping tasks.

#### 4. ESTIMATED IMPACT OF WYLFA NEWYDD

## Cell Occupancy

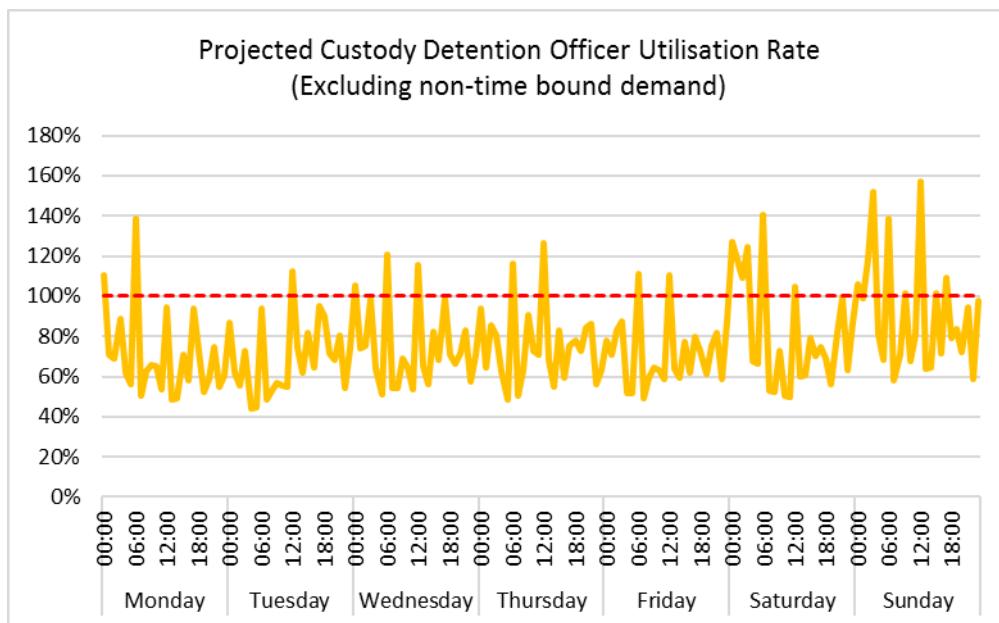
It is estimated that the projected increase in cell occupancy could be managed by Caernarfon Custody for the majority of the time. However, Caernarfon has the highest cell occupancy rate of all NWP suites and is the only one to have reached maximum capacity in the past 12 months. Therefore, there will be a greater risk of reaching cell capacity as arrests are forecast to increase.

Some simplistic simulations estimate that cell occupancy could be reached 3 times in the year. It is, however, unlikely that cell capacity would be exceeded, and if it was, indications are that St Asaph would have cell capacity to absorb the additional demand for a limited time.

## Staff Utilisation

The models indicate Caernarfon sergeants would be able to absorb the estimated increase in demand without additional resource.

However, CDO utilisation, being already high in Caernarfon, would exceed 100% at peak times and sergeants would not be able to absorb the excess CDO demand at these points.



It is estimated that Caernarfon would require an additional 1 CDO for a minimum period of 4 hours on Saturday morning and 8 hours on a Sunday morning to deal with demand, plus at some peak times of weekdays.



## 5. CONCLUSION

It is not estimated that the increase in population and any associated increase in arrests would result in the requirement for the opening of another custody suite.

However, projections indicate that some additional resource would be required in Custody in order to meet peak demand if arrests increase. An additional resource would not be required 24/7, and therefore a bid for an additional resource per rota in order to meet an increased DSL would not be justified. However, an additional 1 FTE in custody would give more resilience to enable peak demand to be dealt with effectively.

Furthermore, in order to maintain the staff to population ratio, an additional 0.91 FTE (sergeant + CDO) would be required in Caernarfon Custody.

It is therefore recommended that an additional 1 FTE should be requested to deal with additional demand related to the peak worker scenario.

In order to achieve the staffing levels detailed above, recruitment for roles would have to occur in advance of the requirement/demand. The table below details how this ramp up and down would occur.

Population Figures in Draft DCO - Accommodation	Recruitment commences a year before the build									
	500	3200	4000	5400	7000	6566	4260	901	187	
	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29
	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9
Custody	0	0	0	0	1	1	1	0	0	0



# Wylfa Newydd Impact Assessment

## Operational & Emergency Planning

**Author:** [REDACTED]

**Date:** 21/09/2018

**Version Number:** 1.0



## 1. INTRODUCTION

Horizon Nuclear Power Ltd. (Horizon) is planning to develop a new nuclear power station at Wylfa, Anglesey as identified in the National Policy Statement for Nuclear Power Generation (EN-6). It is estimated at the peak of the build there will be as many as 9,000 workers required, 2,000 of which will be local residents with the remaining 7,000 imported labour.

The activities involved during the build stage will cause the site to have dangerous substances which have the potential to cause accidents; as a result, early in the build stage the site will come under The Control of Major Accident Hazards Regulations 1999 (CoMAH). The regulations aim to prevent major accidents involving dangerous substances and limit the consequences to people and the environment of any accidents which do occur.

Once established as a Licensed Nuclear Site The Radiation (Emergency Preparedness and Public Information) Regulations 2001 (REPPIR) will be implemented. The Directive lays down the basic safety standards for the protection of the health of workers and the general public against the dangers arising from ionising radiation.

Both CoMAH and REPPIR Regulations place responsibilities on the operator to have on-site emergency plans whilst the off-site emergency plan is the responsibility of the local authority. As a responding organisation, North Wales Police will be consulted with in order to produce these plans.

## 2. PURPOSE OF REPORT

This report has been produced to clarify the capability of the Operational and Emergency Planning Department during both the build phase and ongoing commitment with the establishment of the Wylfa Newydd as a nuclear site. It aims to provide detail as to the current commitments of the Department and its rationale as to why, without an increase in staffing compliment, the Department would not be able to undertake the work streams required to produce and exercise plans and deal with any activity that may occur associated with the construction project.

To estimate the impact, taking into consideration the role of the Operational and Emergency Planning Department within North Wales Police, consideration will need to be given to:

- The development of the plans, both CoMAH and REPPIR
- Planning for emergencies and contingencies
- Policing of protests both at the site and associated sites with the project
- Strategic Coordination Centre
- Exercising of plans
- Mutual Aid

It is recognised that with the current decommissioning sites at Wylfa and Trawsfynydd the Department already has ongoing commitments in relation to the nuclear industry. Associated nuclear meetings are already scheduled within the department and supported by the nuclear lead. The additional work and considerations required in relation to the new build projects will have a substantial impact and does not form part of that scheduled work, therefore, the proposal is to separate and identify the additional workload that this new build project injects to the department.

The various stages of the development programme for the new build will bring about varying challenges to the Department, which will be required to draw up plans and contingencies for the different stages of the large construction project. The Wylfa Newydd construction project is intended to include:

- A power station, including two nuclear reactors
- A Marine Off-Loading Facility (MOLF)
- Cooling water intake and outfall structure



- Electricity transmission infrastructure
- Associated buildings on and off site including administration offices, park and ride facilities, temporary worker accommodation, logistics centre
- Access roads

Each stage will require differing levels of planning and engagement.

### **3. RESPONSIBILITIES**

Operational Support Services (OSS) has corporate ownership of Operational and Emergency Planning matters.

The Department's aim:

'Ensure preparedness of the Organisation in the event of Major Incidents, Emergencies and High Risk Operations, providing necessary tactical advice for such events and supporting organisational learning'.

The Department has core responsibilities within the following business areas:

Emergency Plans and Risk

Flooding, Pollution and Weather

Search

CoMAH and Pipeline

Nuclear

Critical State (including Operation Temperer)

Counter Terrorism planning

Joint Emergency Service Interoperability Process (JESIP)

Force level events and operations

VIP/Royal Visits

Holyhead Port

Mobilisation and Logistics

Disaster Victim Identification and Mass Fatality planning

Football

CBRNe

Prison

Drone Operations

Public Order

Offshore Industry and response

All matters connected with the Civil Contingencies Act 2004 -

North Wales Resilience Forum (NWRF)

Strategic Coordination Centre

Strategic and Tactical Coordination Groups

The Department has specialist skilled officers trained as Counter Terrorism Security Coordinator (CT SecCo), Police Search Advisor (PolSA), Public Order Tactical Advisor (POTAC), Dedicated Football Officer (DFO) Risk Assessment (RA), Offshore Rescue Management (OSARM), Police Mortuary Operations Coordinator, Airwave Tactical Advisors and Structured Debriefing.

The Department also owns and manages force policies around:

Silver Command

Contingency Planning

Hostage and Crisis Negotiation

Policing Events



## Public Order Policing Search

The Department has the responsibility for the development, maintenance and exercising of all Plans which are associated with the above core responsibilities, including security planning around some key subject areas.

The Civil Contingencies Act became law in November 2004. The Act brought into force legislation on emergency planning that had implications for all emergency responders. The Act sets out clear expectations and responsibilities for responders to ensure that they are prepared to deal effectively with the full range of emergencies from localised to catastrophic events. The North Wales Resilience Forum (NWLRF) was formed as a requirement of that Act. The Forum exists to ensure North Wales is prepared to respond to any incident or emergency that poses a significant risk to its communities and produces and maintains the Community Risk Register.

When developing Plans for North Wales Police detailing our policing response to any incident the department also has to review and quality-assure multi-agency Plans ensuring that the detail within those plans dovetails with the North Wales Police response. In addition, National Plans can have an impact on both the multi-agency response, which in turn can impact on our local response.

In addition to the Community Risk Register some plans have to be in place due to legislation, such as the Control of Major Accidents Hazards Regulations 1999 (CoMAH Regulations) and the Radiation (Emergency Preparedness and Public Information) Regulations 2001 (REPPIR).

Trawsfynydd Nuclear Power Station and Wylfa Nuclear Power Station were required to have plans under the REPPIR 2001 Regulations, Trawsfynydd closed in 1991, and Wylfa is now owned by the Nuclear Decommissioning Authority (NDA) and is still required to have plans in place. Both nuclear sites are now decommissioned or decommissioning

The Civil Contingencies Act requires the maintenance of a Strategic Coordination Centre (SCC) within a Local Resilience area, and the North Wales SCC is situated at police Headquarters, Colwyn Bay. The focus of the SCC is the multi-agency coordination, command and control of Major Incidents, which include nuclear incidents. Within the SCC there is emergency nuclear equipment which is subject to six monthly testing. This testing is currently undertaken by EDF Network engineers from Technology Operations, Vodafone UK on behalf of the NDA.

The Operational and Emergency Planning Department is responsible for managing the SCC, being responsible for the infrastructure, liaising with partners and those who require access, ensuring that the building remains fit for purpose. Whilst it is recognised that Wylfa Newydd is creating off-site facilities at Llanfaethlu, strategic coordination will still be required from the SCC.

The SCC is also the focal point for all multi-agency Operational, Tactical and Strategic Coordination Meetings. The Operational and Emergency Planning Team assist with the coordination of the meetings and a member of the team will always attend.

The Department also exists to support all other departments within the Force, any significant operations which take place will have a planner dedicated to the operation to support the planning and coordination of resources.

## 4. EVIDENCE

Whilst it is appreciated that there will always be significant demands made on the Department, the scheduled planned new build project, Wylfa Newydd, can to a degree be predicted, with timelines available which will commit an individual to specific work streams.



It is clear that dedicated planners will need to be involved from the outset; the department has already had to dedicate resources during the application stage. The nuclear industry has legislation which results in the department remaining involved for the duration of the life of the Power Station once established. The Department cannot afford to have another projected abstraction for any lengthy period to manage Wylfa Newydd New Build Project without an increase in establishment.

The current commitment by the nuclear planner from the department is to maintain the current nuclear plans, plan for exercises and attend the following meetings:

Blue Light Working Group (BLWG) – once per quarter
Emergency Planning Consultative Committee (EPCC)- once per quarter
Magnox Site Stakeholder Group - annually
EPCC Sub Group Meeting – newly established currently quarterly
Anglesey Future Securities – currently quarterly

The meetings above do not have any current task and finish groups attached to them and are only a forum for sharing information in relation to the industry, with the exception of the EPCC Sub Group Meeting.

The EPCC has representatives from Horizon and stakeholders involved with the New Build project and is attended by the planner. The Meeting has recently been established and meets on a quarterly basis and is already looking at the project and some planning assumptions surrounding the development of the site.

This Sub-Group sees the commencement of works beginning within the Operational and Emergency Planning Department. The Department does not have any capacity to take on any additional task and finish work, or capacity to commence writing any supporting plans or documents associated with the project.

During the construction phase of Wylfa Newydd there will be regular meetings, having already identified the EPCC Sub Group Meeting, there will be further meetings required surrounding the build and development of plans, MOUs, policies and procedures. The individual identified to undertake this work will need to have a planning background, ideally with some knowledge of the nuclear industry. As the phasing develops, there will need to be regular testing and exercising of plans as they change.

It is anticipated that a structure of new liaison meetings at Operational, Tactical and Strategic levels will develop once the build grows in earnest, and the Operational Planning Dept will be required to represent the organisation in those fora.

Our liaison with the Hinkley Point Project and Avon and Somerset Police (A&SP) supports the expectation that an additional 2 full time planning officers will be required within the Department. During the process A&SP initially overlooked the operational planning role and the direct needs that their build phase would demand on their Operational Planning Department with regards to the development, maintenance and updating of plans, with their initial focus being around the local policing impact due to the large increase in population during the construction project. Their plans are constantly changing and being reviewed due to the ever changing phases of the development project.

It is therefore recommended that a growth in staff is required immediately to be able to meet demand and not have a negative impact on existing commitments.

In the long term, once the REPPIR plans are in place and the site is a working nuclear site I anticipate that the ongoing commitment, as with Wylfa and Trawsfynydd, could be absorbed by the Department.

Operational and Emergency Planning will need a dedicated planner to produce all Protest and Public Order plans associated with the project. They will need to pull together any operations, dynamically or pre-planned in the event of

Wylfa Newydd Impact Assessment – Operational & Emergency Planning – v1.0



any protests associated with the project. Any plans will need to take into consideration the Community Impact Assessment; a full command structure will need to be identified.

All emergency plans are developed with Joint Emergency Service Interoperability Process (JESIP) in mind.

When developing such plans consideration will need to be given to:

Communications and Media Strategy

Tactical Options

Prosecution and Arrest Strategy

Intelligence

Safety Briefings

Protest Plans

CTSA Threat and Risk Assessment

Legislation

Maps will need to be provided detailing boundaries to identify public versus private land with MOUs agreed with Horizon to ascertain what they will deal with and what funding they will provide to police any protests at their locations, including their satellite locations, i.e. park and ride facility, Logistics Centre, etc.

North Wales Police does not have a marine capability to deal with protestor action at sea or within the coastal waters.

A security plan will need to be produced by the site with consultation with all partners including North Wales Police.

Any protests, spontaneous or pre-planned will require lengthy engagement of the planner engaged within the Operational and Emergency Planning Department to produce the policing operation plans to manage the protest, to facilitate peaceful protest, which is a basic human right, and take proportionate action to minimise unlawful activity and also act in a way to minimise the impact in relation to the commission of criminal offences.

Policing of Protests will need to be considered and conversations take place regarding additional funding to manage any protest activity directed at the site(s) involved with the Wylfa Newydd new build. North Wales Police has capability to deal with protests in the short term but:

- Travel times to and from the protest location will impact on the construction project.
- Long term / protracted protests would place a significant burden on North Wales Police and as a Force we would not be able to sustain for any period without the assistance of mutual aid.
- Mutual aid places an additional significant increase in the cost for policing any protests.
- The site footprint will need to provide clear boundaries for public to private land detailing the expectations as to what the site will deal with and the expectations of the police.
- Extra training would be required for Protestor Removal Officers, who are required in the event of protestors 'locking on' etc. Currently NWP only maintains a maximum of 6 trained officers and this is not sufficient to staff a sustained protracted protest. Each course runs for one week, plus an annual week's reaccreditation. The cost is currently £825 per person, and I would estimate that we would need to train at least an additional six officers.

Horizon and the Wylfa Newydd Construction Project will need to be fully aware of the fact that North Wales Police response times may, at times of unexpected protest, impact on the efficiency of their project.



### 3. SUMMARY

On the basis of the information provided by HNP and the assessment undertaken the department would require the following resources to cope with the additional demand and ensure that the development is not at the detriment of NWP or the public of North Wales.

Population Figures in Draft DCO - Accommodation	Recruitment commences a year before the build	500	3200	4000	5400	7000	6566	4260	901	187
Estimated Years	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29
	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9
d. Ops Planning	1	1	1	1	2	2	2	2	1	1

The planners would be multi-skilled in all areas of operational planning work including protest operations. We envisage due to the complexity of the site and the expert knowledge necessary to carry out this role along with the essential professional relationships the planners would be employed full time on the Wylfa New Build.

The posts will be required until the site becomes an operating nuclear establishment.



**HEDDLU GOGLEDD CYMRU**

Gogledd Cymru diogelach

**NORTH WALES POLICE**

A safer North Wales

# Wylfa Newydd Impact Assessment

## Force Communication Centre (FCC)

**Author:** [REDACTED], Management of Information Unit, North Wales Police  
**Date:** 22<sup>nd</sup> October 2018



## 1. INTRODUCTION

Horizon Nuclear Power Ltd. (Horizon) is planning to develop a new nuclear power station at Wylfa, Anglesey as identified in the National Policy Statement for Nuclear Power Generation (EN-6). It is estimated at the peak of the build there will be as many as 9000 workers required, 2000 of which will be local residents with the remaining 7000 imported labour.

The 7000 population increase represents a population increase of 1.0% in North Wales.

## 2. PURPOSE OF REPORT

This report aims to estimate the potential increase in call demand which North Wales Police will experience as a result of an increase in the residential populations in Anglesey and Gwynedd North<sup>1</sup> due to the Wylfa Newydd development, based on the Peak Worker Scenario.

To estimate the impact of the increase in population on the number of calls into the FCC, a model has been created which uses the relationship between the number of calls and the population levels, at a Force level, to provide an estimate of the expected increase in calls given an increase in the population.

## 3. MODEL INPUTS

Call data covering 101 calls is not made publicly available, but those covering 999 calls are available at Police Force Area level for 2016/17. Call data is not available internally below force area level.

The model therefore uses the number of recorded 999 calls in each Force area in England and Wales, and the population in each corresponding area.

The Metropolitan Police have been excluded as an outlier.

### Source of Inputs for Models

1. North Wales Police call data has been obtained from ICCS via Business Objects.
2. Call data for the police force areas in England & Wales has been obtained from iQuanta.
3. Population estimates for mid-2016 for local authorities in Wales has been obtained from the Office for National Statistics.
4. Estimated population increases have been obtained from the Wylfa Newydd Project: Technical Note: Home Based and Non-Home Based Worker Travel Gravity Models.

## 4. MODEL LIMITATIONS

The models are only intended to estimate the number of calls for populations within the population range used to create the models, 497,996 to 2,833,557.

## 5. CALL MODEL

The number of 999 calls in each force area when compared to the corresponding population shows a strong positive correlation (+0.96). This indicates that areas with larger populations are highly likely to have correspondingly high levels of 999 calls.

<sup>1</sup> The two local policing area Anglesey and Gwynedd North combined cover a similar area to the Key Socioeconomic Area (KSE) defined by Horizon; see Appendix A.



**Call Model** =  $191.85 * \text{Population} + (-61079)$

The  $R^2$  value for this model is 0.86 indicating that the number of 999 calls in a force is mostly explained by the size of the population. The P value of <0.0001 shows the result to be significant.

#### Call Model Results

Year	Estimated Population in North Wales	Change	Estimated 999 Calls	Increase in 999 calls on 2018
2018	694,973		72,252	
2019	695,473	500	72,347	0.1%
2020	698,173	3200	72,865	0.8%
2021	698,973	4000	73,019	1.1%
2022	700,373	5400	73,288	1.4%
2023 (Peak Worker Scenario)	701,973	7000	73,595	1.9%

The model estimates that an increase of 7000 to the population of North Wales would result in a 1.9% increase in 999 calls.

There is a very strong (+0.9) correlation between the number of 999 calls and the number of 101 calls. Therefore it is assumed that 101 calls would rise by the same proportion as 999 calls, and increase by 1.9%.

#### 6. IMPACT ON RESOURCES

The DCU have not yet modelled the FCC or the call handling function. Therefore we have no resourcing model with which to test the increase in population on Comms Operator resourcing.

At a basic level, we therefore have to assume that there will be a proportionate increase in resource requirement given an increase in calls i.e. a 1.9% increase in calls will require a 1.9% increase in resource. This would ensure the estimated number of calls per operator (overall) remains the same.

Using this approach, it is estimated that the 1.9% increase in calls (keeping all other variables equal) would require an additional 2.0 FTE of Comms Operator resources, on top of the 105 FTE currently planned.

In order to achieve the staffing levels detailed above, recruitment for roles would have to occur in advance of the requirement/demand. The table below details how this ramp up and down would occur.

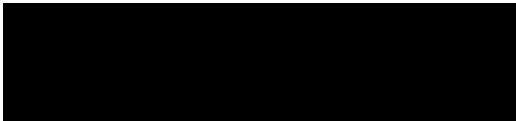
Population Figures in Draft DCO - Accommodation	Recruitment commences a year before the build									
	500	3200	4000	5400	7000	6566	4260	901	187	
	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29
Estimated Years	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9
Call Handling	1	1	1	2	2	2	2	1	1	0

**NB.** In the absence of a resource model, we have not been able to test if the estimated increase in calls would require additional staff at peak times – annual averages have been used.

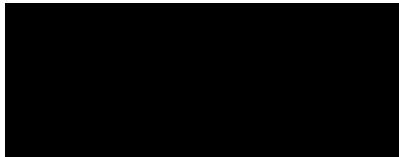


## CONTRIBUTORS

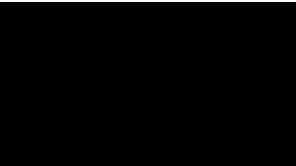
### Operational Support Services



### Local Policing Services



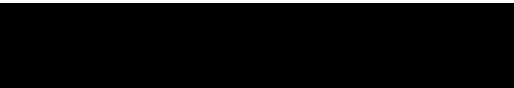
### Roads Policing Unit



### Custody & Neighbourhood Policing



### Crime Services



### Cheshire/North Wales Alliance



### Administration of Justice



### Joint Communications Centre



### Demand & Capability



### Management Accountant





**Portfolio Management Office**



**Facilities & Fleet Department**



**Avon and Somerset Constabulary**

## **Appendix 4: North Wales Police Position Regarding the Section 106 Agreement**

## WYLFA NEWYDD (NUCLEAR GENERATOR) DCO

### NORTH WALES POLICE POSITION REGARDING THE SECTION 106 AGREEMENT

#### 1. EXECUTIVE SUMMARY

- 1.1 North Wales Police is registered as an interested party and is participating in the examination of the Wylfa Newydd Nuclear Power Station DCO (PINS Reference Number: EN010007).
- 1.2 NWP is responsible for the provision of policing for and in the vicinity of the Wylfa Newydd Nuclear Power Station including its associated works and, if consented, the construction and operation of the nuclear power station will have a significant impact on police demand.
- 1.3 NWP has carried out a detailed assessment of this impact and is seeking a financial contribution from the Applicant, Horizon Nuclear Power, to mitigate this impact. In addition, NWP wish to secure the ongoing monitoring of all the DCO plans considered relevant to NWP's statutory functions through an Emergency Services Engagement Group.
- 1.4 NWP has prepared heads of terms for the obligations it wishes to see secured in the section 106 agreement. Given the quantum of the financial contribution required, NWP considers that it is necessary to be a signatory to the section 106 agreement. This will ensure there is a direct contractual relationship between NWP and HNP and allow NWP to monitor and enforce the relevant obligations directly as a contractual party.

#### 2. BACKGROUND

- 2.1 North Wales Police (**NWP**) administers policing responsibilities across the whole of North Wales, including the counties of Isle of Anglesey, Gwynedd, Conwy, Denbighshire, Flintshire and Wrexham.
- 2.2 Prior to November 2012, the NWP was the local police authority under the section 3 of the Police Act 1996 and consisted of seventeen members. The general function of the police authority was to secure the maintenance of an efficient and effective police force for its area, and to hold the chief officer of police of that force to account for the exercise of his functions and those of persons under his direction and control.
- 2.3 However, in 2012, local police authorities in England and Wales were abolished by the Police Reform and Social Responsibility Act 2011 and replaced with directly-elected Police and Crime Commissioners (**PCCs**). A PCC is conferred with a specific statutory function relating to community safety and crime prevention, and is responsible for securing the maintenance of the police force for that area and ensuring that the police force is efficient and effective.
- 2.4 The North Wales PCC, Arfon Jones, is responsible for holding the Chief Constable to account to ensure that the force support the delivery of the objectives detailed in the police and crime plan and meet all of their statutory duties. The primary role of NWP is to ensure community safety, and, in addition, Parliament has passed many statutes placing duties and obligations on the Police. In November 2011 the Policing Protocol Order 2011 was made; this sets out the roles and responsibilities of the relationship between the PCC and the Chief Constable, in summary the Chief Constable is responsible to the public and accountable to the PCC for, amongst other things:
  - 2.4.1 leading the force in a way that is consistent with the attestation made by all constables on appointment and ensuring that it acts with impartiality;
  - 2.4.2 supporting the PCC in the delivery of the strategy and objectives set out in the Plan;
  - 2.4.3 providing the PCC with access to information, officers and staff as required;

2.4.4 having regard to the Strategic Policing Requirement when exercising and planning their policing functions in respect of their force's national and international policing responsibilities;

2.4.5 being the operational voice of policing in the force area and regularly explaining to the public the operational actions of officers and staff under their command; and

2.4.6 having day to day responsibility for financial management of the force within the framework of the agreed budget allocation and levels of authorisation issued by the PCC.

2.5 Horizon Nuclear Power (HNP) are seeking development consent to construct a nuclear generating station (**the Project**) on the Isle of Anglesey and therefore NWP is responsible for the provision of policing both for, and in the vicinity of, the Project. The Project (if granted) will be controlled by a development consent order (**DCO**) and an associated DCO section 106 agreement.

2.6 NWP are also aware that a separate planning application for site preparation and clearing (**SPC**) has been made to Isle of Anglesey County Council (**IACC**). This application has not yet been determined, however it will be accompanied by a section 106 agreement. It is envisaged that the obligations in the SPC section 106 agreement will operate alongside the DCO section 106 agreement. NWP has seen the status note submitted by HNP at deadline 1 and has reviewed the SPC application. It considers the volume of traffic and worker numbers to be low and unlikely to cause a significant impact on NWP resources and therefore has had no involvement in this planning application or the negotiation of the SPC s106 agreement.

2.7 In accordance with its statutory duties, NWP has prepared an Assessment<sup>1</sup> of the effect the Project will have on police demand, which identifies a significant impact, particularly during construction of the Project (**Appendix C of the Written Representations**). The Project's potential impacts on the resources and infrastructure of NWP to maintain a safer North Wales for all is of the upmost importance and NWP has therefore registered as an interested party and is participating in the DCO examination.

2.8 The Assessment considers the challenges posed to NWP by the Project and quantifies the potential financial mitigation that will be required. Based on the findings in the Assessment, NWP is requesting a financial contribution of £13,825,000 from HNP to be secured in the section 106 agreement. The magnitude of the Project's impact on NWP as a statutory authority and the level of contribution required by NWP to mitigate the impact necessitates its involvement in the section 106 agreement as a signatory.

2.9 As well as the financial contribution, NWP wish to secure the ongoing monitoring of the DCO plans considered relevant to NWP's statutory functions through an Emergency Services Engagement Group in the DCO s106 agreement. The Code of Construction Practice is too vague and, in our opinion is being used inappropriately to secure mitigation. Therefore we wish to see the establishment of this group and the remit of its role set out and secured within the DCO s106 agreement instead.

2.10 The mitigation requested to be secured in the DCO s106 agreement is absolutely necessary to allow NWP to comply with the statutory duties imposed on the police force, therefore NWP are not merely an interested party with impacts requiring mitigation. Instead, the mitigation requested by NWP has a direct bearing on the carrying out of its specific statutory function.

### 3. HINKLEY POINT C NUCLEAR GENERATING STATION

3.1 The scale and magnitude of the construction of a nuclear generating station is unique in nature, however fortunately NWP has been able to draw from the information submitted as part of the examination of the Hinkley Point C (Nuclear Generating Station) Order 2013 (**Hinkley**) and subsequently its impact on police resources during the construction phase.

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<sup>1</sup> Wylfa Newydd Assessment of the Impact of Police Demand

- 3.2 During the Hinkley examination, detailed studies were undertaken that identified approximately 21 different potential impacts on community safety and particularly the Avon and Somerset Police from influx of workers, crime and disorder, night time economy etc. as set out in Appendix 1 D of the Community Safety Management Plan (**Appendix 1**). Conversely, the impacts on the Avon and Somerset Police due to major transport works as part of the Project were not assessed.
- 3.3 From discussions that have taken place with Avon and Somerset Police, it is clear that the mitigation contribution provided was not sufficient and the section 106 agreement did not contain a provision that allowed the level of mitigation required by Avon and Somerset Police to be monitored and then revised if necessary. It is also clear that during the construction phase, the police have had to play a crucial role in relation to the impacts of Hinkley Point C on both community safety and transport. On this basis, NWP has assessed impacts on both community safety and transport in its Assessment. In addition, NWP has utilised a standardised methodology in assessing potential impacts of the Wylfa project.
- 3.4 These discussions with Avon and Somerset Police about the impacts Hinkley is having on the police force, have shaped the heads of terms proposed by NWP for the DCO s106 agreement (**Appendix D of the Written Representations**).

#### **4. REASONS FOR NWP TO BE A SIGNATORY**

- 4.1 NWP does not have an interest in the land to which the proposed section 106 would relate. As such, NWP is not required by statute to be a party to the agreement but could be a contractual party to the DCO s106 agreement. There is no statutory bar to NWP being a signatory to a section 106 agreement and it is not unusual for one party to pay another party, other than the local planning authority, mitigation directly under an agreed mechanism in a section 106 agreement.
- 4.2 The quantum of mitigation required, as evidenced in the Assessment, necessitates NWP's involvement as a signatory. Particularly so that NWP has its own contractual relationship with HNP and has recourse if there is a breach of one of the obligations relating to NWP. Given the possible consequences for NWP if HNP breach certain obligations, it would not be appropriate for NWP to have to rely on IACC to take enforcement action on their behalf. Moreover, experience from Hinkley demonstrates that non material changes to the DCO, s 106 agreement and accompanying management plans occur relatively frequently given the size and complexity of the Project. These changes may have an impact on NWP's operations and as a signatory to the s 106 agreement it would be consulted and have an opportunity to provide its input prior to any change being agreed.
- 4.3 In addition, the payment of the contributions directly to NWP by HNP would both relieve IACC's resources by reducing the administrative burden and it would ensure that HNP has transparency of where funds are being spent.

#### **5. NEXT STEPS**

- 5.1 We ask that HNP provide a response to this note and any relevant comments on the heads of terms proposed. Following which we can commence negotiations on the drafting of the DCO s106 agreement.

**Womble Bond Dickinson**

**30 November 2018**

## **APPENDIX 1**

### **Appendix D1 of the Hinkley Community Safety Management Strategy**



Hinkley Point C

Development  
Consent Order  
Application

Environmental  
Statement  
Doc Ref 4.18  
October 2011

## Environmental Statement - Annex 6 Community Safety Management Plan



Save today. Save tomorrow.



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# APPENDIX 1D

Table of potential impacts and possible mitigations

GEN060\_YY\_SOE\_J REP\_0031\_rev6.0 - CSMP impacts and mitigations

Preliminary works

Main works

**PRELIMINARY WORKS**

Reference	Description of risk:	Planned mitigations	Public Service Provider resource			Means of monitoring
			Fire	Emergency	Public Service Provider resource	
			SCC	WSC	SDC	Other
<b>Initials of workers and their families</b>						
CSMP 1	Increased likelihood of incidents needing the services of the public service providers.	EDFE commitment to fund additional resource based upon proven need.	PG/PGSO staff.	Community Safety Officer.	CSO staff.	CSO staff.
CSMP 2	Shift working causing disruption, congestion, etc. <b>Note: no shift working in preliminary works, however, potential for complaints re disruption.</b>	Code of conduct to set expectations of workers within the community. Construction hotline.	Addressed through CSMP 1.	Name	Addressed through CSMP 1.	None
CSMP 3	Workers and families new to area, potential to draw on public services due to a poor judgement/ lack of local knowledge, potential for road traffic collision.	Welcome pack and induction process to consider key messages. Accommodation Office to hold user information. Community Liaison Officer able to assist. Use of awareness campaigns and initiatives.	Lealets for Accommodation Office welcome pack.	Lealets for Accommodation Office welcome pack. Participation in awareness campaigns/initiatives. One SCC initiative anticipated during preliminary works.	Lealets for Accommodation Office welcome pack. Participation in awareness campaigns/initiatives. One SCC initiative anticipated during preliminary works.	Addressed through CSMP 1.
<b>Crime and disorder</b>						
CSMP 4	Disagreements (worker/policeman/woman) workers causing disorder and requiring Police presence (and potentially ambulance attendance). Single males seen as high risk group.	Code of conduct and induction process setting expectations, role of CLO, construction hotline, intelligence share with public service providers.	Addressed through CSMP 1.	Name	Addressed through CSMP 1.	None
CSMP 5	Anti-Social Behaviour associated with workers/communities of workers/communities requiring Community Safety response from emergency services and/or local authorities. Potential for arson.	Code of conduct and induction process setting expectations, role of CLO. Information share with public service providers. Access to CLO by public and workers. Construction hotline. Community meetings for Hard to reach groups (PACT etc). Mitigations against occurrence CSMP 4 and CSMP 5. If an incident occurs then CSMP 6 will be the outcome.	Addressed through CSMP 1.	Name	Addressed through CSMP 1.	None
CSMP 6	Damage and debris resulting from disorder and debris resulting from Environmental Services.	None	None	Contingency fund for clean up following protests and incidents.	Contingency fund for clean up following protests and incidents.	None
CSMP 7	Crime on sites/main construction or ADI requiring Police attendance.	Addressed through CSMP 1 and OCPA. Intelligence share with CLO. Campuses to Secure by Design standard.	None	None	None	None
CSMP 8	Burglary, car theft etc at worker accommodation.	Addressed through CSMP 1. Awareness campaigns and intelligence sharing by CLO. Construction hotline.	None	None	None	None
CSMP 9	Sexual assault by worker.	Addressed through CSMP 1. Worker code of conduct to set expectations. Intelligence sharing. Construction hotline.	None	None	Addressed through CSMP 1.	None
CSMP 10	Gangmaster crime associated with construction work packages.	Contract conditions and contractor vetting will prevent occurrence.	None	None	None	None
<b>Night time economy</b>						
CSMP 11	Alcohol related assault.	Strict rules re alcohol. Code of conduct and induction process setting expectations. role of CLO, information share with public service providers. Construction hotline.	Addressed through CSMP 1 and 3.	None	Addressed through CSMP 1.	Addressed through CSMP 1.

GEN060\_YY\_SOE\_J REP\_0091\_rev5.0 - CSMP impacts and mitigations

**PRELIMINARY WORKS**

Reference	Direct, indirect or none	Planned mitigations	Public Service Provider resource				Means of monitoring
			Police	Fire	Ambulance	SCC	
CSMP 12	Drink driving.	Strict rules on alcohol. Code of conduct and induction process setting expectations, awareness campaigns, role of CLO, information share with public service providers.	Addressed through CSMP 3.	Addressed through CSMP 3.	None	None	Record of incidents and actions, regular reports to Emergency Services and Local Authorities Group.
CSMP 13	Prostitution.	Code of conduct and induction process setting expectations, role of CLO, information share with public service providers.	Addressed through CSMP 1.	None	None	None	Addressed through CSMP 11. Regular reports to Emergency Services and Local Authorities Group.
CSMP 14	Large groups socialising together, not committing any offence but raising concerns of others.	Code of conduct and induction process setting expectations, role of CLO, information share with public service providers. PACT/ similar meetings attended by CLO. Construction online.	Addressed through CSMP 1.	None	None	Addressed through CSMP 1.	Record of incidents and actions, regular reports to Emergency Services and Local Authorities Group.
CSMP 15	Increase in unlicensed properties/ traders.	Workers directed to avoid illegal property/ illegal landlords removed from list, awareness campaigns.	Addressed through CSMP 1.	Addressed through CSMP 1 and CSMP 16.	None	LA activity not immediately related to community safety. Resource/ funding under discussion outside CSMP.	None
Accommodation	Sub standard properties entering market, requiring action by Housing Officer.	Accommodation Management Strategy, minimum standard of accommodation set for EDFE worker, provider to confirm property is safe, legal. Legal property landlords removed from list, awareness campaigns. Information share with public service providers, home safety visits of providers, home safety visits of accommodation.	Contribution to content of leaflets for Accommodation Office/ welcome pack. Participation in awareness campaigns/ initiatives addressed through CSMP 3. Home safety visits of accommodation.	None	None	Contingency fund for emergency response re workers accommodated within the community. CCU start time to plan for main works.	Record of incidents and actions, regular reports to Emergency Services and Local Authorities Group.
CSMP 16	Fire risk associated with single male occupants.	Operation of Accommodation Management Strategy, awareness campaigns directed at vulnerable groups.	Addressed through CSMP 3. Potential to direct campaigns at specific groups. Home safety visits of accommodation.	None	None	None	Record of incidents and actions, regular reports to Emergency Services and Local Authorities Group. Record of awareness campaigns undertaken.
CSMP 17	Anti social behaviour in care of property, unhygienic waste, inconsiderate parking, noise.	Code of conduct. Access to CLO. EDFE website for information/ gray areas. CLO attendance at PACT/ similar meetings. Awareness campaigns. Construction online.	Addressed through CSMP 1.	Addressed through CSMP 3.	None	Addressed through CSMP 1.	Contingency fund for emergency response re workers accommodated within the community. CCU start time to plan for main works.
CSMP 18	Increased homelessness due to restricted availability of affordable accommodation, increased work for Housing Officer.	Accommodation Management Strategy to signpost workers away from pressures, advertising to bring in additional accommodation.	Addressed through CSMP 1.	Addressed through CSMP 1.	None	Addressed in Accommodation Strategy.	Record of calls to Housing Officer and reasons for calls. Record of number/ location of workers.
CSMP 19	Emergency accommodation of workers should there be a need to evacuate a campus or area densely populated by workers. Note: campus accommodation will not be in place for preliminary works.	EDFE to develop a business continuity evacuation procedure.	None	None	Contingency fund for emergency response re workers accommodated within the community. CCU start time to plan for main works.	Contingency fund for emergency response re workers accommodated within the community. CCU start time to plan for main works.	Unlikely event; monitor success during event. Learn lessons/ amend strategy as necessary.
Equalities and community cohesion							

COMMUNITY SAFETY MANAGEMENT PLAN  
Impacts and mitigations

GEN060\_YY\_SOE\_J REP\_0031\_rev5.0 - CSMP impacts and mitigations

**PRELIMINARY WORKS**

Reference	Description of risk	Current mitigation	Addressed through CSMP 1.	SDC	WSG	Public Service Provider mitigation	Notes on monitoring
CSMP 21	Cultural differences leading to local political activism.	Code of conduct setting expectations of workers. CLO attending PACT similar meetings, meetings with vulnerable groups. Information sharing with public services providers. Awareness campaigns. Worker and public. Construction firms.	None	None	None	To investigate migrant workers fund operated by SSG to see what lessons can be learnt/ what may be of benefit to this project.	Record of incidents and actions, regular reports to Emergency Services and Local Authorities Group.
CSMP 22	Cultural differences of workers and their families requiring resources not currently available, e.g. translation services.	Accommodation Office and CLO providing support to worker.	None	None	None	None	Monitoring of worker needs and induction and through contact with Accommodation Office/ CLO.
CSMP 23	Community tension due to uncertainties and concerns raised by the public. Workers also considering potential impacts on vulnerable elements of the community (e.g. increase in fear of crime in elderly residents etc).	Access to CLO and EDFE website for information contact details. Givewars. CLO attendance at PACT/ similar meetings.	None	None	None	EDFE to investigate support of third sector groups.	Record of contact made with CLO and actions taken. Record of attendance at meetings, questions raised and outcome. Regular reporting to Emergency Services and Local Authorities group.

Note of changes made:

Date	Description of change
22/03/2011	Creation of schedule for preliminary works.
28/03/2011	CSO role in CSMP 1 added.
28/06/2011	CSMP 12, 18, 19 ref Police amended to cross refer to CSMP 1
20/07/2011	Updated to reflect resourcing as set out in draft S106 document

GEN050\_YY\_SOE\_J REP\_0031\_rev6.0 - CSMP impacts and mitigations

Note: the following schedule was prepared in a workshop attended by the Emergency Services and Local Authorities Group and subsequently developed through consultation with the group. It reflects an open discussion on potential impacts and possible mitigations, both real and perceived. It does not reflect confirmed impacts identified through statistical research or review of an evidence base.

**MAIN WORKS**

Reference	Description of risk	Planned mitigation		Public Service Provider resource		SAC	Owner	Means of monitoring
		Police	Fire	SAC	WSC			
CSMP 1	Increased population causes increased demand of incidents needing the services of the public service providers.	EDFE commitment to fund additional resource based upon proven need.	PSI/PDU POSO staff.	None	None	CSO staff.	CSO staff.	Monitoring of resource and commitment against funding through Emergency Services and Local Authorities Group.
CSMP 2	Shift working causing disruption; noise at and social hours, congestion, etc.	Code of conduct to set expectations of workers within the community. Shifts aimed to avoid peaks in traffic. Construction home.	Addressed through CSMP 1.	None	None	Addressed through CSMP 1.	Addressed through CSMP 1.	EDFE to monitor comments/ complaints. Feedback to Emergency Services and Local Authorities Group. Record of calls to hotline and reasons.
CSMP 3	Workers and families new to area, potential for draw on public services due to poor judgement/ lack of local knowledge.	Leaflets for Accommodation Office welcome pack. Participation in awareness campaigns/ initiatives. Additional role of current Fire Service Initiatives.	Leaflets for Accommodation Office welcome pack. Participation in awareness campaigns/ initiatives. Use of Community Policing Van. Community liaison Officer role to assist. Use of awareness campaigns.	None	None	None	None	EDFE to investigate working with third sector groups.
Crime and disorder								
CSMP 4	Disagreements (worker public, worker/ worker) causing disorder and requiring Police presence (and potentially ambulance attendance). Single makes seen as high risk.	Code of conduct and induction process setting expectations. role of CLO, construction home, Information share with public service providers.	Addressed through CSMP 1.	None	None	Addressed through CSMP 1.	Addressed through CSMP 1.	Record of incidents and actions, feedback to Emergency Services and Local Authorities Group.
CSMP 5	Anti-Social Behaviour associated with workforce/accommodation locations of workforce requiring community safety response from emergency services and/or local authorities. Potential for arson.	Code of conduct and induction process setting expectations. role of CLO. Information share with public service providers. Access to CLO by public and worker. Community meetings (PACT etc).	Addressed through CSMP 1.	None	None	Addressed through CSMP 1.	Addressed through CSMP 1.	Record of incidents and actions, feedback to Emergency Services and Local Authorities Group.
CSMP 6	Damage and debris resulting from disorder requiring action by Environmental Services.	Mitigations agreed and actions are addressed in CSMP 1 and CSMP 5. If an incident occurs then CSMP 6 will be the outcome.	None	None	None	Contingency fund for clean up following protests and incidents.	Contingency fund for clean up following protests and incidents.	Record of incidents and actions, feedback to Emergency Services and Local Authorities Group.
CSMP 7	Crime on sites (main construction or AD) requiring Police attendance.	Addressed through CSMP 1 and CSMP 5. Information share with CLO. Campuses to Secure by Design standard.	Addressed through CSMP 1.	None	None	None	None	Record of incidents and actions, feedback to Emergency Services and Local Authorities Group.
CSMP 8	Burglaries, car theft etc at worker accommodation.	Awareness campaigns and information sharing by CLO.	Addressed through CSMP 1.	None	None	None	None	Record of incidents and actions, feedback to Emergency Services and Local Authorities Group.
CSMP 9	Sexual assault by worker.	Addressed through CSMP 1. Number code of conduct to set expectations. Intelligence sharing.	Addressed through CSMP 1.	None	None	None	Addressed through CSMP 1.	Record of incidents and actions, feedback to Emergency Services and Local Authorities Group.
CSMP 10	Gangmaster crime associated with construction work packages.	Contract conditions and contractor vetting will prevent occurrence.	None	None	None	None	None	Record of incidents and actions, feedback to Emergency Services and Local Authorities Group.
CSMP 25	Child protection issues.	Code of conduct to set expectations of workers when within the community.	Addressed through CSMP 1.	None	None	None	Addressed through Education Strategy.	Record of incidents and actions, feedback to Emergency Services and Local Authorities Group.
CSMP 26	Domestic violence.	Code of conduct to set expectations of workers when within the community.	Addressed through CSMP 1.	None	None	None	Addressed through CSMP 1.	Record of incidents and actions, feedback to Emergency Services and Local Authorities Group.
<b>Night time economy</b>								

Reference	Description of risk	Planned mitigations		Police	Fire	Ambulance	Public Services Provider resource	SSC	WSC	Other	Means of monitoring
		Addressed through CSMP 1.	Addressed through CSMP 2.								
CSMP 11	Alcohol related assault.	Strict rules re alcohol. Code of conduct and induction process setting expectations, role of C.I.O., information share with public service providers. Construction timeline.	Addressed through CSMP 1.	None	Addressed through CSMP 1.	None	Addressed through CSMP 1.	Addressed through CSMP 1.	Addressed through CSMP 1.	EDFE to investigate working with third sector groups.	Record of incidents and actions, feedback to Emergency Services and Local Authorities Group.
CSMP 12	Drink driving.	Strict rules re alcohol. Code of conduct and induction process setting expectations, role of C.I.O., information share with public service providers. EDFE to consider provision of shuttle bus from Bridgewater to site campus at peak times.	Addressed through CSMP 1.	Addressed through CSMP 3.	None	None	None	None	None	Addressed through CSMP 11.	Record of incidents and actions, feedback to Emergency Services and Local Authorities Group.
CSMP 13	Prostitution.	Code of conduct and induction process setting expectations, role of C.I.O., information share with public service providers.	Addressed through CSMP 1.	None	None	None	Addressed through CSMP 1.	Addressed through CSMP 1.	Addressed through CSMP 1.	Addressed through CSMP 11.	Record of incidents and actions, feedback to Emergency Services and Local Authorities Group.
CSMP 14	Large groups socialising together.	Code of conduct and induction process setting expectations, role of C.I.O., information share with public service providers. PACT/ similar meetings attended by C.I.O. Construction timeline.	Addressed through CSMP 1.	None	None	Addressed through CSMP 1.	Addressed through CSMP 1.	None	None	Addressed through CSMP 11.	Record of incidents and actions, feedback to Emergency Services and Local Authorities Group.
CSMP 15	Increase in unlicensed properties/ traders.	Workers directed to avoid illegal property, legal landlords removed from list of accommodation available to workers, awareness campaigns.	Addressed through CSMP 1.	Addressed through CSMP 1 and CSMP 16.	None	None	Addressed through CSMP 1.	None	None	None	Record of incidents and actions, feedback to Emergency Services and Local Authorities Group.
<b>Accommodation</b>		Sub standard properties entering the market, requiring action by Housing Officer.	None	Leafllets for Accommodation	None	None	Leafllets for Accommodation	None	None	None	Record of incidents and actions, feedback to Emergency Services and Local Authorities Group.
CSMP 16				Other welfare pack.			Participation in awareness campaigns, initiatives addressed through CSMP 2.				
				Home safety visits of accommodation.							
CSMP 17	Fire risk associated with single male occupants.	Operation of Accommodation Management Strategy, management campaigns directed at vulnerable groups.	None	Addressed through CSMP 3.	None	Addressed through CSMP 3.	Potential to direct campaigns at specific groups.	None	None	None	Record of incidents and actions, feedback to Emergency Services and Local Authorities Group.
CSMP 18	Anti social behaviour in use of property, undrugs, waste, incendiary parcels, noise.	Code of conduct. Access to C.I.O., EDFE website for information, EDFE grievance process. C.I.O. attendance at PA/C17/ similar meetings. Awareness campaigns. Construction timeline.	Addressed through CSMP 5.	Addressed through CSMP 3.	None	Addressed through CSMP 1.	Addressed through CSMP 1.	None	None	None	Record of incidents and actions, feedback to Emergency Services and Local Authorities Group.
CSMP 19	Increased homelessness due to restricted availability of affordable accommodation, increased work for Housing Officer.	Accommodation Management Strategy, to signpost workers away from pressures, advertising to bring in additional accommodation. Housing Fund.	Addressed through CSMP 1.	None	None	Addressed in Accommodation Management Strategy.	Addressed in Accommodation Management Strategy.	None	None	None	EDFE monitoring of worker choices and accommodation take up.
CSMP 20	Emergency accommodation of workers should there be a need to evacuate a campus or area densely populated by workers.	EDFE to develop a business continuity evacuation procedure.	Addressed through CSMP 1.	None	None	None	None	None	None	None	Unlikely event; monitor success during event, learn lessons, amend strategy as necessary.
<b>Equalities and community cohesion</b>											

COMMUNITY SAFETY MANAGEMENT PLAN  
Impacts and mitigations

Reference	Description of risk	Planned mitigations	Public Service Provider resource				None or monitoring
			Police	Fire	Ambulance	SDC	
CSMP 21	Cultural differences leading to local political activism.	Code of conduct setting out standing PACT/ similar meetings. Meetings with vulnerable groups. Information sharing with public services providers. Awareness campaigns online.	Addressed through CSMP 1.	None	None	Addressed through CSMP 1.	Record of incidents and actions, feedback to Emergency Services and Local Authorities Group.
CSMP 22	Cultural differences of workers and their families requiring resources not currently available, e.g. translation service.	Funded subscription to CLO telephone translation service.	Funded subscription to telephone translation service.	Funded subscription to telephone translation service.	Funded subscription to telephone translation service.	None	Monitoring of worker needs at induction and through contact with Accommodation Office.
CSMP 23	Community tension due to uncertainties and concerns raised by influx of workers also concerning potential impacts on vulnerable elements of the community (e.g. increase in fear of crime in elderly residents etc).	Access to CLO and EDFE website for information contact details. EDFE grievance process. CLO attendance at PACT/ similar meetings.	Addressed through CSMP 1.	None	Addressed through CSMP 1.	Addressed through CSMP 1.	Record of contact made with CLO and actions taken. Record of attendance at meetings. Questions raised and outcome. Feedback to Emergency Services and Local Authorities Group.
Governance	Flow of information between stakeholders causing confusion and mixed messages to the public, inaction to incidents, poor post incident review, risk of recurrence without lessons learnt.	Regular contact between key stakeholders, regular meetings of Emergency Services and Local Authorities Group to consider community safety related matters.	Ongoing project relations and intelligence sharing, attendance at stakeholder meetings.	Ongoing project relations and intelligence sharing, attendance at stakeholder meetings.	Ongoing project relations and intelligence sharing, attendance at stakeholder meetings.	Addressed through CSMP 1.	Ongoing project relations (multi agency Community Safety Team and Civil Contingencies Unit) and intelligence sharing, attendance at stakeholder meetings.

Note of changes made:

Date	Description of change
28/02/2011	CSMP 1 - EDFE to train additional co responders (from within workforce), not DSFR.
28/02/2011	CSMP 5 - arson identified as a potential risk associated with anti social behaviour.
28/02/2011	CSMP 12 - DSFR role re initiatives noted.
28/02/2011	CSMP 18 - DSFR role re initiatives noted.
22/03/2011	CSMP 3 - ASC and DSFR initially quantified.
22/03/2011	CSMP 1 - reference to CCTV staffing removed following SDC/ WSC advice that service will be discontinued.
22/03/2011	CSMP 24 and CSMP 25 added under crime and disorder.
28/03/2011	CSMP 2 - resourcing issue for ASC as a consequence of anti working.
28/03/2011	CSO role in CSMP 11 added.
28/03/2011	SCC resources included.
28/06/2011	CSMP 12, 20, 25, 26 to Police amended to cross refer to CSMP.
29/09/2011	Updated for inclusion in DCO submission.

## **Appendix 5: Section 106 Heads of Terms Required by North Wales Police for Wylfa Newydd Nuclear Power Station**

## SECTION 106 HEADS OF TERMS REQUIRED BY NORTH WALES POLICE FOR WYLFA NEWYDD

### NUCLEAR POWER STATION

#### 1. INTRODUCTION

- 1.1 North Wales Police (**NWP**) have prepared a comprehensive Assessment of the Impact on Police Demand (**Impact Assessment**) that evidences mitigation required to effectively police the North Wales area, for the lifetime of the proposed Wylfa Newydd Nuclear Power Station.
- 1.2 The mitigation identified is broad; however it is fair and proportionate to the scale and complexity of the proposed development. The Impact Assessment is realistic mitigation to address the influx of up to 7,000 additional non-local workers and the detrimental impact this population increase will have on policing.
- 1.3 It should be noted that in order to inform the Impact Assessment and proposed mitigation, North Wales Police have discussed policing issues with the Avon and Somerset Constabulary following the grant, and associated implementation of, the Hinkley Point C (Nuclear Generating Station) Order 2013.
- 1.4 These Heads of Terms do not include the mitigation fund relating to the road policing unit (transport and traffic) impacts. This will follow at Deadline 3.

#### 2. HEADS OF TERMS

<b>Application Reference</b>	PINS Reference Number: EN010007	
<b>Site Address</b>	Wylfa Newydd Anglesey	
<b>DCO</b>	The draft Wylfa Newydd (Nuclear Generating Station) Order	
<b>Applicant</b>	Horizon Nuclear Power ( <b>HNP</b> )	
<b>Council</b>	Isle of Anglesey County Council ( <b>IACC</b> )	
<b>Proposed Obligations</b>		

	<b>Obligation</b>	<b>Trigger</b>
Notification of commencement	HNP must notify NWP of the date that it intends to commence development.	2 years prior to commencing development or upon completion the agreement, whichever is the earlier.
Police Construction Contribution	<p>HNP must make ten payments as set out below directly to NWP to be used for the purposes summarised at paragraph 3:</p> <p>Year 0: £928,000  Year 1: £932,000  Year 2: £1,146,000  Year 3: £1,582,000  Year 4: £1,914,000  Year 5: £1,915,000  Year 6: £1,867,000  Year 7: £1,318,000  Year 8: £824,000  Year 9: £715,000.</p>	<p>The first payment is due upon the later of the date development consent is granted or 2 years prior to commencement of development, whichever is the earlier.</p> <p>Subsequent payments are payable on the anniversary of the first payment for a period of 9 years.</p>
Police Contribution report	NWP must provide HNP with a report setting out:  how the payments received to date have been spent; and  whether there has been an overspend or underspend – if there is an overspend (not exceeding 10% of the last payment) the additional funds are payable by HNP to NWP within 28 days (unless the matter is referred to arbitration or mediation) and if there is an underspend any surplus funds must be returned to HNP within 28 days.	Three months following receipt of the second Police Construction Contribution payment and annually thereafter for a period of 9 years.
Ceasing construction	<p>If HNP cease construction for a period of more than 1 month, it may request a break in the Police Construction Contribution payments.</p> <p>NWP will prepare a summary of Administrative Running</p>	-

	<p>Costs (the costs in relation to maintaining increased resource for the proposed period that development will cease for), which will need to be covered during the break in payment within 28 days of receiving a request from HNP.</p> <p>HNP has 14 days to approve the level of Administrative Running Costs – any dispute is to be referred to arbitration or mediation.</p>	
Delay in construction programme	<p>NWP may revise its impact assessment in accordance with the terms below if there is a delay of more than 1 month in the construction timetable.</p>	
Revised impact assessment	<p>NWP may request monitoring data from HNP no more than bi-annually.</p> <p>The data must be received within 14 days of receiving a request.</p> <p>Following receipt of the monitoring data NWP may prepare an updated impact assessment (if deemed necessary) and submit this to IACC and HNP for review. This must set out the justification for any revised calculations for the mitigation requirements.</p> <p>HNP has a period of 14 days to review the revised impact assessment and confirm whether it is agreed.</p> <p>If HNP does not agree with the report, it has a right to reply and make comments/ counter proposals within 35 days of receiving the report.</p> <p>If NWP do not agree with any revisions proposed by HNP, the process can be referred to arbitration or mediation, which requires the process to be dealt with in full within a 28 day period. That decision is binding and final.</p> <p><i>NWP have not had sight of the arbitration or mediation provisions within the draft section 106 agreement prepared by HNP, IACC and the Welsh Government and so would need to review this in full upon receipt of the document. This comment applies throughout these Heads of Terms</i></p>	Following the first payment and no more than once a year.

	<p><i>where a referral to this mechanism is mentioned.</i></p>	
Decommissioning	<p>At the point of decommissioning, HNP must supply NWP with a copy of the environmental impact assessment in order that NWP can carry out an assessment on the impacts of decommissioning on NWP resources (<b>decommissioning assessment</b>).</p> <p>HNP must make any additional payments identified by the decommissioning assessment in accordance with the timings set out in the assessment.</p> <p>If HNP do not agree with the mitigation proposed by NWP, the process can be referred to arbitration or mediation, which requires the process to be dealt with in full within a 28 day period. That decision is binding and final.</p>	
Contingency fund for emergency services	<p>A contingency fund for emergency services must be secured within the section 106 agreement.</p> <p>The administration procedures must be set out to ensure there is a robust set of criteria against which any request for funds can be considered by the Programme Board.</p> <p>There must be an obligation that requires HNP to make a payment to NWP from the contingency fund in the event that unforeseen mitigation is required in relation to a one-off event which falls outside of the scope of the impact assessment (e.g. an evacuation event or a protest).</p> <p>HNP must apply to the Programme Board for a payment which will be assessed against the criteria for funding requests before the application is determined.</p>	-
Approval of plans	<p>NWP must approve the following plans:</p> <ul style="list-style-type: none"> <li>• Code of Conduct and Supplier Code of Conduct (if separate);</li> <li>• Community safety management strategy;</li> <li>• Protest management strategy;</li> </ul>	

	<ul style="list-style-type: none"> <li>• Nuclear site security plan; and</li> <li>• MOLF operational plan.</li> </ul> <p>NWP must be consulted on the approval of the following plans:</p> <ul style="list-style-type: none"> <li>• Health and Wellbeing strategy;</li> <li>• Operational travel strategy;</li> <li>• Traffic incident management plan;</li> <li>• Jobs and skills strategy;</li> <li>• Construction traffic management strategy; and</li> <li>• Operation traffic management strategy.</li> </ul> <p><i>This may be secured within the wording of the requirements in the DCO rather than forming part of the s106 obligations.</i></p>	
Emergency Services Engagement Group	<p>HNP must establish an Emergency Services Engagement Group which must consist of at least one representative from each emergency service.</p> <p>The Emergency Services Engagement Group must convene to review the operation of the relevant plans secured through the DCO and consider whether the plans remain appropriate. It must also be notified of any proposed changes to these plans submitted to IACC by HNP and given an opportunity to comment on these changes.</p> <p>The Emergency Services Engagement Group may also submit any changes deemed necessary to IACC for approval, provided those changes do not lead to materially new or different environmental effects.</p> <p>Any changes must also be reported to HNP who have 14 days to comment on the changes. If no agreement can be reached the matter should be referred to mediation or arbitration.</p>	<p>Prior to commencement of development.</p> <p>At least four times a year for the first 10 years following commencement of development and twice a year thereafter for the lifetime of the development.</p>

	<p>The relevant plans are:</p> <ul style="list-style-type: none"> <li>• Code of construction practice;</li> <li>• Code of operational practice;</li> <li>• Sub codes of construction practice for associated developments;</li> <li>• Code of conduct;</li> <li>• Supplier code of conduct;</li> <li>• Workforce management strategy;</li> <li>• Workforce accommodation strategy;</li> <li>• Community safety management strategy;</li> <li>• Health and Wellbeing strategy;</li> <li>• Operational travel strategy;</li> <li>• Nuclear site security plan;</li> <li>• Protest management strategy;</li> <li>• Jobs and skills strategy;</li> <li>• Traffic incident management plan;</li> <li>• Construction traffic management strategy;</li> <li>• Operation traffic management strategy; and</li> <li>• MOLF operational plan.</li> </ul>	
Community Impact Fund	<p>The Emergency Services Engagement Group must be notified of any applications for funds from the Community Impact Fund.</p> <p>The Emergency Services Engagement Group must be given two weeks to review the application and decide whether the application affects or relates to community safety.</p> <p>If the Emergency Services Engagement Group decides the application does affect or relate to community safety, it will</p>	-

	be appointed as one of the bodies responsible for determining the application. A mechanism must be established within the Section 106 Agreement in order to ensure that the Community Impact Fund is properly distributed and controlled.	
Temporary Police Facility	HNP must pay £683,000 to NWP to construct a new police station to accommodate the additional policing resource.	Upon completion of the s106 agreement.
Police arbitration/mediation clause	If the section 106 agreement does not contain a satisfactory arbitration or mediation clause, NWP reserve the right to include a clause which relates to the obligations set out above.	-
Professional fees	To pay all reasonable professional fees incurred by NWP in connection with the negotiation and completion of the section 106 agreement.	Upon completion of the section 106 agreement.
Indexation	<p>All payments payable to NWP should be index linked to the Retail Price Index (<b>RPI</b>), but NWP have the right to review this provision if at any time inflation exceeds RPI.</p> <p><i>NWP will need to review the indexation mechanism proposed in the draft Section 106 agreement and determine whether it is appropriate and fit for purpose and adequately considers the consequence of inflationary pressures and its relationship to the RPI.</i></p>	

### 3. JUSTIFICATION FOR CONTRIBUTION

#### 3.1 Police Resourcing Requirement

3.1.1 In Wales there is a strong positive correlation between population and reported incidents and crime, meaning areas with larger populations experience more reported incidents and crime. Models based on this principle show the estimated population increase of 7000 at the point of the Peak Worker Scenario in 2023 as defined by Horizon is likely to result in a 7.8% increase in crime and a 6.1% increase in reported incidents.

3.1.2 The Impact Assessment sets out in detail the need for additional resourcing, but a summary of the additional fulltime employees required and associated costs are shown in the table below:

Function	Year 0		Year 1		Year 2		Year 3		Year 4		Year 5		Year 6		Year 7		Year 8		Year 9	
	FTE	£k																		
Local Policing	9	154	6	281	9	408	13	583	17	768	17	768	17	768	9	408	3	154	9	154
Custody	0	0	0	0	0	0	0	0	1	41	1	41	1	41	0	0	0	0	0	0
Operational and Emergency Planning	1	48	1	48	1	48	2	96	2	96	2	96	2	96	1	48	1	48		
Road Policing Unit – RPU and Commercial Vehicle Unit																				
Force Control Centre	1	36	1	36	1	36	2	73	2	73	2	73	2	73	1	36	1	36	0	0
Managed Response Unit	0	0	0.25	8	0.25	8	0.5	15	0.5	15	0.5	15	0.25	15	0.25	8	0	0	0	0
Investigation Support Unit	0	0	0.25	8	0.25	8	0.5	15	0.5	15	0.5	15	0.25	15	0.25	8	0	0	0	0
Crime Services	3	143	3	143	4	191	5	239	5	239	5	239	5	239	4	191	3	143	2	96

Function	Year 0		Year 1		Year 2		Year 3		Year 4		Year 5		Year 6		Year 7		Year 8		Year 9	
	FTE	£k	FTE	£k	FTE	£k	FTE	£k	FTE	£k	FTE	£k	FTE	£k	FTE	£k	FTE	£k	FTE	£k
Administration of Justice	0	0	0.5	15	0.5	15	1	30	1	30	1	30	1	30	0.5	15	0	0	0	0
Programme Management and Support	2	96	2	96	2	96	2	96	2	96	2	96	2	96	2	96	2	96	2	96
Training	3	143	1	48	1	48	1	48	1	48	1	48	1	48	1	48	1	48	1	48
Overheads		186		205		257		358		426		426		426		271		157		132
Exit Costs		0		0		0		0		0		0		0		142		142		142
<b>Total Requirement</b>	<b>13</b>	<b>807</b>	<b>15</b>	<b>887</b>	<b>19</b>	<b>1,114</b>	<b>27</b>	<b>1,553</b>	<b>32</b>	<b>1,846</b>	<b>32</b>	<b>1,846</b>	<b>32</b>	<b>1,846</b>	<b>20</b>	<b>1,318</b>	<b>11</b>	<b>824</b>	<b>9</b>	<b>715</b>

3.2 Figures for the mitigation required for the Road Policing Unit are still being finalised and will be added to these totals by deadline 3.

### 3.3 Policing Capital Requirement

In addition to resource, capital investment in infrastructure is also required to support the core policing. This has been broken down into four main elements. The total investment required over years 0-9 is £3,065,000 with all costs based on current 2018-19 costs is set out below.

Function	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Total
<b>Facilities</b> (Using land which is currently part of the NWP estate and building a new police station)	683	0	0	0	0	0	0	0	0	0	683
<b>Vehicle Costs</b>	76	17	26	17	41	66	15	0	0	0	259

Function										Total
	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9
(Based on three models currently used by NWP, a full breakdown is available in the Impact Assessment)										
<b>Equipment Costs</b> (ANPR cameras, average speed cameras and ProLaser)										TBC
<b>IT Infrastructure</b> (Laptops, desktops, tablets, airwave radios, mobiles etc)	45	28	6	12	27	3	6	0	0	127
<b>Total Costs £k</b>	<b>804</b>	<b>45</b>	<b>32</b>	<b>29</b>	<b>68</b>	<b>69</b>	<b>21</b>	<b>0</b>	<b>0</b>	<b>1,069</b>

3.4 Figures for the mitigation required for the Road Policing Unit, which will include equipment costs are still being finalised and will be added to these totals by deadline 3.