

**From:** [Ben Lewis](#)  
**To:** [Kay Sully](#); [Wylfa Newydd](#)  
**Subject:** RE: Proposed Development Consent Order at Wylfa Newydd - Response to Examination Deadline 3  
**Date:** 18 December 2018 15:17:26  
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[image649193.png](#)  
[image724852.png](#)  
[image500767.png](#)  
[NWP Submission for Wylfa Newydd DCO Deadline 3 \(FINAL SUBMITTED\) \(Ref WN-NWP-DL3 v1\).doc.pdf](#)

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Kay

It has been brought to my attention that the version of our deadline 3 submission that was sent to you earlier did not have the Appendices included within the pdf. Please accept my apologies for this.

I have attached the pdf which includes the Appendices. Please treat this as NWP's Deadline 3 submission.

I would be grateful if you could confirm that this is acceptable.

Many thanks

Ben

**Ben Lewis**

Infrastructure and Energy Director



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**Our offices will be closed on Monday 24th December for the Christmas period**

**and will reopen on Wednesday 2nd January 2019.**

**Wishing you a very merry Christmas and a happy new year from Barton Willmore!**

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**From:** Ben Lewis

**Sent:** 18 December 2018 11:58

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**Subject:** Proposed Development Consent Order at Wylfa Newydd - Response to Examination Deadline 3

**Importance:** High

Kay

On behalf of North Wales Police, I am pleased to submit a response to Examination Deadline 3. The attached document comprises the following:

- Comments on Local Impact Reports;
- Comments on WRs and responses to comments on RRs;
- Comments on responses to the ExA's Written Questions; and
- Summary of Impact on Roads Policing Unit.

I look forward to hearing from you with confirmation of receipt of this submission.

Many thanks and kind regards

Ben

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**HEDDLU GOGLEDD CYMRU**  
Gogledd Cymru diogelach

**NORTH WALES POLICE**  
A safer North Wales

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

**Deadline 3 Submission  
ON BEHALF OF NORTH WALES POLICE**

**Doc Ref: WN-NWP-DL3 v1  
18<sup>th</sup> December 2018**

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## Appendix

Appendix 1: North Wales Police: Police Impact Assessment – Road Policing Unit

Appendix 2: Updated Section 106 Heads of Terms Required by North Wales Police for Wylfa  
Newydd Nuclear Power Station

# 1 INTRODUCTION

- 1.1 In line with the Examining Authority's (ExA) timetable for the Examination in accordance with Rule 8 of the Infrastructure Planning (Examination Procedure) Rules 2010, this statement sets out the submission, on behalf of North Wales Police, for Deadline 3.
- 1.2 The statement comprises the following submissions:
- a) Comments on Local Impact Reports;
  - b) Comments on WRs and responses to comments on RRs;
  - c) Comments on responses to the ExA's Written Questions; and
  - d) Summary of Impact on Roads Policing Unit.
- 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 comments on the submissions made by the Applicant and Interested Parties at Deadline 2. The Applicant's Deadline 2 submissions have been reviewed to identify if any aspects of NWP's concerns raised in its Deadline 2 submission has been addressed. Where the concerns have been addressed, this is identified herein. The submissions by other key stakeholders have also been reviewed to identify any areas requiring comment by NWP or any concerns that are shared with these parties. NWP has commented in this way to assist the ExA in identifying the key concerns of these stakeholders and the commonality between them. For the purpose of this submission, key stakeholders include:
- Isle of Anglesey County Council (IACC);
  - Welsh Government (WG);
  - Gwynedd Council (GC);
  - North Wales Fire and Rescue Service (NWFRS);
  - Welsh Ambulance Service Trust (WAST);
  - Betsi Cadwaladr University Health Board (BCUHB);
  - Conwy County Borough Council (CCBC); and
  - North Anglesey Councils Partnership (NACP).
- 1.5 The submissions reviewed by NWP and its consultant team comprise:

Author	Ref:	Deadline 2 Submission
<b>Horizon Nuclear Power</b>	REP2-001	Cover E-mail
	REP2-002	Response to Examining Authority's Written Questions
	REP2-003	Written Representation
	REP2-004	Summary table of amendments to the draft DCO (Revision 3.0)
	REP2-006	Response to post-hearing documents including any written submissions of oral case
	REP2-020	Draft Development Consent Order (Revision 3.0)
	REP2-021	Draft Development Consent Order (Track change version Revision 3.0 against Revision 2.0)

Author	Ref:	Deadline 2 Submission
	REP2-22	Draft Development Consent Order (Track change version - Revision 3.0 against Revision 1.0 APP-029)
	REP2-23	Explanatory Memorandum (Revision 4.0)
	REP2-24	Explanatory Memorandum (Track change version - Revision 4.0 against Revision 1.0 APP-030)
	REP2-25	Explanatory Memorandum (Track change version - Revision 4.0)
	REP2-31	8.6 Wylfa Newydd Code of Construction Practice
	REP2-32	8.7 Main Power Station Site Sub-Code of Construction Practice
	REP2-33	8.8 Marine Works Sub-Code of Construction Practice
	REP2-34	8.9 Off-Site Power Station Facilities Sub-Code of Construction Practice
	REP2-55	8.10 Park and Ride sub-Code of Construction Practice
	REP2-36	8.12 A5025 Off-line Highway Improvements Sub-Code of Construction Practice
	REP2-37	8.13 Wylfa Newydd Code of Operational Practice
	REP2-38	8.14 Mitigation Route Map (Rev 2.0)
	REP2-041	Statement of Common Ground between Horizon Nuclear Power Wylfa Limited and the Isle of Anglesey County Council
	REP2-042	Statement of Common Ground between Horizon Nuclear Power Wylfa Limited and North Wales Fire and Rescue Service
	REP2-043	Statement of Common Ground between Horizon Nuclear Power Wylfa Limited and the Welsh Government
	REP2-050	Statement of Commonality for Statements of Common Ground
	REP2-051	Statement of Common Ground between Horizon Nuclear Power Wylfa Limited and Gwynedd County Council
	REP2-053	Statement of Common Ground between Horizon Nuclear Power Wylfa Limited and North Wales Police
	REP2-055	Statement of Common Ground between Horizon Nuclear Power Wylfa Limited and Welsh Ambulance Service
	REP2-057	Statement of Common Ground between Horizon Nuclear Power Wylfa Limited and Conwy County Council
	REP2-059	Statement of Common Ground between Horizon Nuclear Power Wylfa Limited and Betsi Cadwaladr University Health Board
	REP2-373	8.11 Logistics Centre sub-CoCP
	REP2-374	Cover Letter
<b>Isle of Anglesey County Council</b>	REP2-061	Local Impact Report Chapter 1
	REP2-063	Local Impact Report - Chapter 3 Economic Development
	REP2-064	Local Impact Report - Chapter 4 - Economic Development - Supply Chain
	REP2-066	Local Impact report - Chapter 6 Safeguarding
	REP2-070	Local Impact Report - Chapter 10 Traffic and Transport.
	REP2-076	Local Impact Report Chapter 16 Cumulative Impact Assessment
	REP2-083	Local Impact Report - Chapter 23 Conclusion
	REP2-093	Local Impact Report - Annex 1J - Review of Horizons DCO

Author	Ref:	Deadline 2 Submission
		Application (Traffic and Transport)
	REP2-117	Local Impact Report Annex 8C - IACC Construction Workers Accommodation Position Statement (June 2016)
	REP2-153	Response to Examining Authority's First Round of Written Questions
	REP-213	Comments on the updated application documents submitted by the Applicant in response to Section 51 advice
	REP2-215	Comments on the information submitted by the Applicant on 17 October 2018 in relation to the Blasting and Vessel Movement Change Requests
	REP2-218	Written Representation
<b>Gwynedd Council</b>	REP2-294	Response to Examining Authority's Written Questions
	REP2-296	Comments on the information submitted by the Applicant on 17 October 2018 in relation to the Blasting and Vessel Movement Change Requests
	REP2-297	Local Impact Report
<b>Betsi Cadwaladr UHB</b>	REP2-277	Written Representation
	REP2-278	Response to the Examining Authorities Written Questions
<b>Conwy County Borough Council</b>	REP2-289	Local Impact Report
<b>Holyhead Town Council</b>	REP2-304	Written Representation
<b>National Grid Electricity Transmission PLC</b>	REP2-312	Written Representation and Response to Examining Authority's Written Questions
<b>North Anglesey Councils Partnership</b>	REP2-335	Written Representation - Traffic and Transport Other Matters
	REP2-338	Written Representation - Traffic and Transport - A5025 Traffic and transport
	REP2-339	Written Representation - Traffic and Transport Cross Country Routes
<b>North Wales Fire and Rescue Service</b>	REP2-343	Response to Examining Authority's Written Questions
	REP2-344	Written Representation
<b>Welsh Ambulance Service Trust</b>	REP2-362	Response to Examining Authority's Written Questions
	REP2-363	Written Representation
<b>Welsh Government</b>	REP2-366	Response to Examining Authority's Written Questions
	REP2-367	Written representation
	REP2-368	Summary of Written Representation

1.6 This statement sets out NWP's comments on those documents above considered to be of particular concern or importance to NWP. Relevant cross referencing to other DCO documentation, either revised or as submitted has also been provided where appropriate.

1.7 The remainder of this document is organised as follows:

- North Wales Police: Update on Summary of Assessment of Impact on Police Demand;

- Transport & Highways – Deadline 2 Submissions;
- Horizon Nuclear Power Deadline 2 Submissions;
- Deadline 2 Submissions by Others;
- The Development Consent Order and Section 106 Obligations; and
- Conclusions.



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

- 2.1 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) was submitted to the Examination within NWP's Deadline 2 submission (Ref: REP2-345). 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.
- 2.2 The PIA 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
- 2.3 The assessment of impact on the duties of the Road Policing Unit Commercial Vehicle Unit<sup>5</sup> was not submitted at Deadline 2 as it was undergoing an external review process by traffic and transportation consultancy, Vectos. This process has been completed and the RPU-specific assessment is included as Appendix 1. The RPU assessment forms part of the PIA) submitted at Deadline 2. In light of the submission of the RPU assessment, the Heads of Terms submitted at Deadline 2 have been updated to reflect the contribution sought to the RPU as a direct result of the proposed development. The updated Heads of Terms are included as Appendix 2 of this statement.
- 2.4 As part of the review process, NWP has been working with its consultants to examine in detail the traffic analysis and assumptions in the DCO application documents. This has identified 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. Importantly, it is clear from a review of the submissions of key stakeholders at Deadline 2 that NWP's concerns are shared by a number of prescribed bodies and interested parties.
- 2.5 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.

- 2.6 In summary, 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.

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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

### **3 TRANSPORT & HIGHWAYS: DEADLINE 2 SUBMISSIONS**

- 3.1 The potential traffic and transportation impacts of the proposed Wylfa Newydd nuclear power station is predicted by NWP to create the largest effect on police demand. This was demonstrated through the detailed PIA submitted to the Examination within NWP's Deadline 2 submission (Ref: REP2-345). 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.
- 3.2 In light of this, NWP has commissioned a review of relevant Deadline 2 submissions from a traffic and transportation perspective. This has been undertaken by external consultancy, Vectos.
- 3.3 The review covers responses to the Deadline 2 submissions from Isle of Anglesey County Council (IOCC), North Anglesey Councils Partnership (NACP), Gwynedd County Council (GCC) and the Welsh Government (WG) on transport and highways matters.
- 3.4 This response follows the previous NWP representations regarding the validity of the Horizon Nuclear Transport Assessment and supplementary documents whereby issues such as highway safety, base traffic data, the cumulative effects of the North Wales Connection DCO application submitted National Grid, AILs and other key concerns were raised. These issues have yet to be fully addressed by HNP following consultation between Vectos and HNP's consultants, Steer.
- 3.5 The structure of this section adheres to these key concerns and is set out as follows:
- Highway Safety
  - Cumulative effects with National Grid's North Wales Connection
  - AILs
  - Other key concerns – Fly parking, Park and Ride

#### **Highway Safety**

- 3.6 Highway Safety is a broad term which comprises many components including road safety / accident analysis, forecasting / junction modelling and sensitivity testing. All of these issues have the potential to have a fundamental bearing on highway safety. NWP's concerns in this regard remain as per its written representation submitted at Deadline 2.
- 3.7 NWP will await HNP's response to its written representations but wishes to highlight to the Examining Authority that its concerns are also shared with a number of statutory consultees, namely IACC, NACP, GCC and WG.
- 3.8 Within their various responses including - Local Impact Report Chapter 10 Traffic and Transport(REP2-070), IACC have numerous concerns all with a bearing on highway safety notably;
- MOLF targets / deliverability (3.6, 3.1.7);
  - Programme delays and hence more HGVs per day (3.1.6);
  - Car Sharing Strategy (3.2) and the fundamental effect this has on traffic calculations and assessment of effects including highway safety;
  - Use of unsuitable Roads (3.3);

- Shuttle Bus strategy (3.4);
- Damage to the highway network (3.5);
- Use of unsuitable roads (3.8);
- Network resilience / junction capacity including Britannia Bridges (3.9);
- Road safety and accident analysis (3.10); and
- Discussions on Traffic Incident Management (TIMP) are sought (5.6.2).

3.9 NWP share the concerns raised by IACC in respect of highway safety.

3.10 NACP are concerned about the effect of additional traffic on the A5025 whereby there are existing traffic speed issues on links and through villages creating community severance issues particularly at Tregele and Amlwch. In the NACP written representations within the A5025 Tregele document (REP2-338) paras 1.1.2, 1.1.3, 2.1.1 there are clear concerns over traffic speeds, pedestrians and highway safety.

3.11 Within the NACP written representations on Cross County Routes (REP2-339) there is reference to road safety between Amlwch and the site - Section 3 and Section 4. At para 4.1.4 there is concern that 10 serious accidents on the A5025 to Amlwch over 5 years is not considered to be an issue of highway safety. The representations also question the validity of the transport work underpinning the TA as HGV traffic seemingly (4.1.7) reduces through LLanfechell Village during the construction periods.

3.12 GCC also make numerous references to highway safety issues including;

- Base traffic data and modelling (GC 23/24);
- Sensitivity testing including at Britannia Bridges (GC26-GC30);
- Car Sharing proportions (GC31-GC32);
- Traffic modelling (GC39)

3.13 NWP support all of key points of concerns raised by GCC within its Statement of Common Ground (SoCG) with Horizon (REP2-051) on highways matters. GCC's significant concerns with respect to the baseline and assumptions used by HNP in its traffic assessment are also reiterated in GCC's Comments on the information submitted by the Applicant on 17 October 2018 in relation to the Blasting and Vessel Movement Change Requests (REP2-296).

3.14 Within the SoCG between HNP and the WG (REP2-043), the WG raises clear concerns in respect of:

- Traffic modelling sensitivity analysis (SoCG ID: WG54)
- Acceptance of the merge / diverge assessment (SoCG ID: WG56)
- The effect at A55 junction 2 (SoCG ID: WG57)
- The principal of the ITTS – car sharing, construction vehicles, effect at Britannia Bridge (SoCG ID: WG58)
- Sensitivity testing (SoCG IDs: WG59, WG63, WG64, WG66)
- Effect at Britannia Bridge (SoCG ID: WG60)
- Concerns of the overall strategy - principles / objectives for construction workers including travel plan (SoCG ID: WG70)

3.15 Again, these are all concerns shared by NWP.

### **Cumulative effects with National Grid's North Wales Connection**

- 3.16 At Section 3.10.3 in IACC's written representations (REP2-218), it is clear that the Council considers that the effect of the traffic from the National Grid project should be considered within the assessment to understand the cumulative effect.
- 3.17 NWP support this and consider the assessment, results, conclusions and mitigation measures to be flawed without its inclusion.

### **Abnormal Indivisible Loads (AILs)**

- 3.18 At Section 6.3.20 of its written representations (REP2-218), IACC set out that the proportion, size, timing and routing of AILs need to be determined in order to mitigate the effect.
- 3.19 WG (SoCG IDs: WG69, WG71) (REP2-043) do not want AILs transported on the strategic network during peak periods.
- 3.20 NWP support these concerns.

### **Other Concerns**

- 3.21 Fly Parking is a concern raised by IACC in its written representations (REP2-218) (paras -1.1.2/1.1.8/3.7.1.6/ 3.7.1.7/3.7.2.1/3.7.2.2) and GCC in its SoCG (SoCG IDs: GC32, GC49, GC50) at bus stops and / or other locations used by construction workers.
- 3.22 GCC are concerned that the proposals do not consider additional Park and Ride sites e.g. on the mainland (SoCG ID: GC44) (REP2-051).
- 3.23 NWP support these additional concerns.

### **Conclusions**

- 3.24 There is clear concern from IACC, GCC, WG and NACP that the Transport Assessment prepared by Horizon is not sufficiently robust and has not satisfactorily assessed the significant effect of large increases in HGV and construction worker movements.
- 3.25 The various fundamental assumptions relating to car share proportions, shuttle bus usage, material transported via MOLF proportions and the number of workers accommodated on site all need to provide sensitivity tests to enable a robust assessment of the potential effects to be considered. In the context of the NWP, this means understanding what effect all of this may have on the appropriate level of monitoring and staffing required for policing.
- 3.26 There is also no tangible control or monitoring mechanisms within the overriding transport strategy and whilst most documentation points to the CoCP, there is no certainty of any mechanisms to monitor and control / mitigate any adverse effects arising from the proposals. Nor is there any substance to what penalty may be imposed should any of the various parameters be exceeded.
- 3.27 NWP submits that the ExA should explore all of these shared concerns in detail during the scheduled Issue Specific Hearings on traffic and transportation in January 2019.

## 4 HORIZON NUCLEAR POWER DEADLINE 2 SUBMISSIONS

- 4.1 NWP submitted a written representation (REP2-345) at Deadline 2 which set out in detail its concerns with respect to the DCO application by HNP.
- 4.2 This written representation identified a number of 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.
- 4.3 As NWP's comments were submitted at Deadline 2, it is acknowledged that HNP will not provide a formal response until Deadline 3. Notwithstanding this, NWP has reviewed the submissions made by HNP at Deadline 2 to determine if any of its concerns have been addressed. In the vast majority of cases, this is not the case and as such, NWP reserves its right to comment on HNP's responses following Deadline 3.
- 4.4 NWP's comments on specific aspects of a HNP's Deadline 2 submissions are set out below.

### **Statement of Common Ground between North Wales Police & Horizon Nuclear Power**

- 4.5 Dialogue between NWP and HNP is on-going with respect to the SoCG, and NWP is progressing the actions identified in the draft SoCG submitted by HNP at Deadline 2 (REP2-053). The latest draft SoCG was provided by HNP to NWP on 29<sup>th</sup> November 2018. It is noted in HNP's cover letter to its Deadline 2 submissions (REP2-374), its Response to post-hearing documents including any submissions of oral case (REP2-006), and in its Written Representation (REP2-003), that HNP has chosen not to respond to NWP's Deadline 1 submissions as it considers that the latest draft of the SoCG addresses a number of NWP's concerns (REP2-374, para 23). NWP disputes this position and awaits HNP's response to its Deadline 1 and 2 submissions.
- 4.6 With respect to the latest draft SoCG, NWP can confirm that the position detailed in the Statement of Commonality (REP2-050) is correct and the SoCG has yet to be agreed in draft. It is also noted that Tables 4-1, 4-2 and 4-4 all identify 'cumulative effects' as an agreed matter between HNP and NWP. NWP disputes this as it does not consider that HNP has adequately assessed the cumulative effect of the North Wales Connection on traffic and transportation.
- 4.7 NWP also note from the Statement of Commonality (REP2-050) that 4 parties have agreed SoCGs in a different format to the standard format adopted for the others. NWP also requested a different format SoCG and provided HNP with a template, but this request was refused by HNP on the basis that all SoCGs used the same format. This is clearly not the case.
- 4.8 NWP will provide a further update to the ExA on progress with the SoCG as the Examination continues. It is expected that this will be at Deadline 4.

## **Code of Construction Practice, sub-CoCPs and Code of Operational Practice**

- 4.9 The CoCP and the sub-CoCPs are defined as 'control documents' within the 'Guide to the Application' (Rev 2.0) (Ref: REP1-002). A revised draft CoCP (REP2-31) was submitted at Deadline 2, together with first drafts of sub-CoCPs for the following:
- Off-Site Power Station Facilities (REP2-34);
  - Main Power Station Site (REP2-32);
  - Park and Ride (REP2-55);
  - A5025 Off-line Highway Improvements (REP2-36);
  - Logistics Centre (REP2-373); and
  - Marine Works (REP2-33).
- 4.10 A number of concerns with respect to the CoCP were raised by NWP in its Deadline 2 submission (REP2-345). These are summarised below:
- the CoCP as currently drafted does not contain sufficient detail to be regarded as a final version
  - the document should be subject to a requirement for it to be approved by IACC and NWP prior to the commencement of development;
  - the document lacks a clear hierarchy required for the plans and strategies intended to control the development and ensure the required mitigation is implemented;
  - detail on the approval and contingency mechanisms for CEMPs is absent;
  - the terms of reference, and arrangements for the administration and governance of the programme board have not been developed in enough detail and a specific article is required in the DCO to secure this;
  - an Emergency Services Engagement Group (ESEG) should be established which has a role across a number of CoCP topic areas, and it is critical that a representative of that group is included within the Programme Board
  - Representatives on the Programme Board should not be responsible for determining whether or not a contingency payment is made to their own body. Details of how funds should be allocated, including a set of criteria, should be set out in the section 106 agreement.
- 4.11 These concerns have not been addressed by the revised CoCP submitted at Deadline 2. In addition, the first draft sub-CoCPs do not provide anywhere near the level of detail required for 'control documents' and in light of this are relatively meaningless at this stage in the Examination.
- 4.12 There have been limited updates to the CoCP in comparison to the version submitted with the application and as such NWP reserves the right to comment further once HNP has responded to its concerns.
- 4.13 The principle update to the CoCP centres around the creation of the Wylfa Newydd Major Permissions Oversight Panel (WNMPOP). The updated CoCP reiterates the detail provided on WNMPOP by HNP at Deadline 1.
- 4.14 NWP raised concerns regarding WNMPOP in Section 6 of its Deadline 2 submission. Whilst it is understood that HNP is undertaking further work on governance of the WNMPOP, including making proposals regarding the appointment of a chair, NWP has not been party to any discussion around the structure, governance or membership of WNMPOP (or the Programme Board) and sub groups. It is NWP's firm view that 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 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. 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.

4.15 NWP maintains its position that an ESEG should be established which has a role across a number of CoCP topic areas, and it is critical that a representative of that group is included within the WNMPOP.

4.16 It is noted that some of the CoCP wording around Code of Conduct has been strengthened, but NWP remain of the view that the document lacks clarity on how it will be enforced. There are a number of other areas where updated wording has raised concerns for NWP – these include the following:

Paragraph No.	Relevant text	NWP Comment
3.4.20	<i>The CSMS will set out the ways in which Horizon and the emergency services will work together in line with the principles of a worker Code of Conduct (refer to section 4.10), including implications on resourcing, joint ways of working and identifying key responsibilities of each organisation in relation to community safety.</i>	The text in this para has been amended so that HNP are no longer committed to work with the emergency services "...to enforce its principles ..." the Code of Conduct, the updated text simply requires them to work "...in line with its principles...". This, in NWP's view, constitutes a weakening of HNP's commitment to its Code of Conduct.
5.3.7	This paragraph stated that HNP would restrict on-site parking to encourage use of shuttle buses and car sharing. The paragraph has been deleted from the updated CoCP.	There appears to have a complete change in position within the updated CoCP with HNP now proposing a 'monitor and manage' approach to car parking which, in NWP's view, will be ineffective in forcing workers to utilise the alternative provision available. In order to ensure that such commitments are effective, NWP submit that it would be necessary to secure the commitment to car sharing in the DCO or, more logically, the section 106 agreement (as is often the norm for far smaller infrastructure schemes in England and Wales). The Travel Plan Officer, in this regard, should assume a role in ensuring that the car sharing scheme is complied with.  It is noted that the assessment considers that three workers would utilise car sharing, although the basis for this assumption, and how it would be enforced, is absent. As



Paragraph No.	Relevant text	NWP Comment
		with many aspects of the commitments HNP continue to make in relation to the project, if they have assessed and/or assumed that such car sharing will take place, then this must form a commitment in the DCO application and be secured accordingly.
5.7.1	Para states that levels of car sharing are proposed to be monitored through spot checks. It also states that non-compliance <b>could</b> result in refusal of entry to site (our emphasis).	NWP consider the monitoring method to be ineffectual and the CoCP lacks a firm commitment to enforcement.
5.9.1	<i>“Wylfa Newydd DCO Project Horizon has no statutory authority in the event of a traffic incident on the road network. However, Horizon will assist with incident management planning through the following measures:”</i>	<p>Within the Statement of Common Ground between Horizon Nuclear Power Wylfa Limited and IACC (Ref: XXXXX), it is stated that <i>“Horizon has responded to the request of the North Wales Police to not formally submit a TIMP and to agree that Horizon will adhere to any diversions put in place by the Police or any other statutory authority in the event of an incident”</i>.</p> <p>NWP has no recollection of making this request to HNP. However in <b>Horizon Nuclear Power - Responses to ExAs First Written Questions Pages 353 -354, Q11.1.5, HNP response b (REP2-002)</b>, HNP expand on this point and reference how through the CoCP HNP and its supply chain would assist with incident management. NWP welcome this further detail and have no objection to in effect the TIMP text being part of the CoCP but only if as set out in our Deadline 2 submission, NWP have the ability to approve the CoCP . Further discussions would also be required to reach agreement on the appropriate level of detail to implement the plans.</p>

- 4.17 In terms of the Code of Operational Practice (CoOP) (REP2-37), the revised version submitted at Deadline 2 does not include any changes of particular relevance to NWP. However, NWP would like to stress that the ESEG need to be involved in reviews of the Operational Travel Strategy as referred to in para. 5.3.25 of the CoOP. NWP maintains its other concerns raised on the CoOP in its Deadline 2 submission.

- 4.18 NWP considers that HNP has failed to adequately account for the overlap between the CoCP and the CoOP. Given that Reactor 1 could be operational whilst construction continues elsewhere on site, it is critical that there is a joined-up approach between the 2 documents. The ESEG should therefore be represented on the management operational panels for both the CoCP and the CoOP.

#### **Responses to ExAs First Written Questions (REP2-002)**

- 4.19 NWP has concerns about the comments made by HNP in its response to Q10.2.1 (b) and is of the opinion that this approach to individuals failing security or screening checks renders the initial checks meaningless.
- 4.20 The Office for Nuclear Regulation (ONR) guide for Pre-employment Screening and National Security Vetting<sup>1</sup> states that the civil nuclear industry is obliged to follow HM Government's policies on the BPSS and NSV. This applies to staff and contractors of a Site Licensed Company, of which HNP will need to become prior to commencement of the build and operation.
- 4.21 Clarification and guidance should be sought from the ONR as the inspecting body for the civil nuclear industry.

- 4.22 For clarity below we have supplied the description of each security check.

- Basic Disclosure Certificate - A basic check is a criminal record check. A basic check will contain details of convictions and conditional cautions considered to be unspent under the terms of the Rehabilitation of Offenders Act 1974<sup>2</sup>. The check will not cover any time you lived outside the UK.
- Confirmation of Right to Work in the UK – Document check
- National Security Vetting (United Kingdom Security Vetting (UKSV))<sup>3</sup>

There are 3 security levels:

- Counter Terrorist Check (CTC): is carried out if an individual is working in proximity to public figures, or requires unescorted access to certain military, civil, industrial or commercial establishments assessed to be at particular risk from terrorist attack.
- Security Check (SC): determines that a person's character and personal circumstances are such that they can be trusted to work in a position which involves long-term, frequent and uncontrolled access to SECRET assets.
- Developed Vetting: (DV) in addition to SC, this detailed check is appropriate when an individual has long term, frequent and uncontrolled access to 'Top Secret' information. There is also Enhanced DV.

- 4.23 Baseline Personnel Security Standard [BPSS] (BPSS is not a security clearance) This check is a government standard for the pre-employment screening of civil servants, members of the armed forces, temporary staff and government contractors. The Baseline Personnel Security Standard requires the verification of the following four elements:

1. Identity
2. Employment history (past three years)
3. Nationality and immigration status

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<sup>1</sup> [http://www.onr.org.uk/operational/tech\\_asst\\_guides/cns-tast-gd-8.2.pdf](http://www.onr.org.uk/operational/tech_asst_guides/cns-tast-gd-8.2.pdf)

<sup>2</sup> <https://www.gov.uk/government/publications/basic-checks>

<sup>3</sup> <https://www.gov.uk/guidance/security-vetting-and-clearance>

#### 4. Criminal record (unspent convictions only)

- 4.24 A reasonable account of any significant periods (a total of 6 months or more in the past 3 years) spent abroad. Prospective employees who have recently come to the UK or lived abroad may be asked to provide overseas police certificates of good conduct.

#### Statements of Common Ground

- 4.25 HNP has submitted a number of draft SoCGs at Deadline 2. NWP's comments on the content of these are set out below.

Statement of Common Ground	Relevant Text	NWP Comments
Welsh Government (REP2-043)	The SoCG between Horizon Nuclear Power Wylfa Limited and the Welsh Government, it is stated (SoCG ID WG96) that the WG is in the process of agreeing a contingency plan and proposed financial contribution for the emergency services.	At the Team Wales meeting on the 27th November 2018, it was stated by HNP that the second Draft S106 and schedules would be shared with all the Team Wales stakeholders by the 30 <sup>th</sup> November 2018. To date we have not had sight of these documents and note that a draft s106 was not submitted by HNP at Deadline 2. A further request for copies of these documents was made to HNP on the 10 <sup>th</sup> December 2018. No response has been received.
	The SoCG also states (SoCG ID WG96) that the DCO should include a requirement for the submission of an Abnormal Indivisible Loads (AILs) Management Plan prior to development commencing that has been developed in conjunction with North Wales Trunk Road Agency, Welsh Government Transport, Gwynedd Council, Isle of Anglesey County Council, and North Wales Police.	The recognition by WG that NWP should be involved in the development of an AILs Management Plan is welcomed and supported. AILs have to be notified to NWP and if necessary, an escort provided. Full details on NWP AILs responsibilities are provided in the RPU impact assessment included at Appendix 1. NWP has previously had discussions with WG, who confirmed that NWP (rather than a private company) should escort all AILs that require an escort.
North Wales Fire & Rescue Service (REP2-042)	SoCG ID: NWFRS 13 Impact on A5025 between Amlwch and Wylfa  While this road will be used by construction workers, it is no longer a main commuting route to the site and as such it is not anticipated that this section of the A5025 will need improvement solely due to the proposed Wylfa Newydd Project. [agreed]	NWP is concerned that NWFRS has agreed that no further discussion is required on this matter.

Statement of Common Ground	Relevant Text	NWP Comments
	<p>SoCG ID: NWFRS 14 - Assessment Methodology (MOLF)</p> <p>For assessment purposes, the number of construction vehicles required to access the Wylfa Newydd Development Area each day has been calculated assuming that the MOLF receives 60% of construction materials. This is a conservative estimate and the target is for the MOLF to receive 80% of bulk materials (the ES is therefore based on the worst case scenario). Based on these assumptions, during the peak of construction activity, up to 40 heavy goods vehicles per hour are expected to travel between the Logistics Centre and the Wylfa Newydd Development Area.</p> <p>The effects of any delays to the MOLF will be managed in accordance with the WN CoCP. It is agreed between the parties that no further discussions are required with regard to this matter. [agreed]</p>	<p>Noted that NWFRS accepts Horizon's "worst case" methodology to be 60% of bulk materials via the MOLF.</p> <p>But it is noted in SoCG ID: NWFRS 15 that NWFRS highlight a lack of contingency in the event that the MOLF is out of action, aligned to the concerns raised by NWP.</p>
<p>Welsh Ambulance Service NHS Trust (WAST) (REP2-055)</p>	<p>SoCG ID: WAST 021 - Cumulative Impacts, National Grid North Wales Connection Project</p> <p>Agreed position. The cumulative effects of the Project together with the North Wales Connection Project have been assessed and are reported in chapter I5 of the Environmental Statement (APP-388). [agreed]</p>	<p>NWP note with concern WAST's agreement to Horizon's assessment of cumulative impacts.</p>
<p>National Grid (REP2-044)</p>	<p>NG02 - Transport, information sharing</p> <p>The parties have been working together to share information on their respective Transport Assessments (TAs). As the Horizon TA (APP-101) was</p>	<p>NWP notes the acknowledgement here by Horizon that the submitted TA is not an accurate reflection of the NG TA and therefore must be updated. NWP is concerned that no further action is proposed to address this shortcoming.</p>

Statement of Common Ground	Relevant Text	NWP Comments
	completed prior to the NGET TA being completed, NGET were only able to provide draft flows for the Britannia Bridge, which was undertaken and reported in Appendix L of the Wylfa Newydd Transport Assessment. It is agreed that Horizon used the best available information at the time of its assessment to inform the TA. [agreed]	

## 5 DEADLINE 2 SUBMISSIONS BY OTHERS

### Introduction

- 5.1 This section sets out NWP's comments with respect to the submissions by other key stakeholders. The submissions were reviewed to identify any areas of dispute requiring comment by NWP or any concerns that are shared with these parties. NWP has commented in this way to assist the ExA in identifying the key concerns of these stakeholders and the commonality between them.

### Welsh Government Deadline 2 Submissions

- 5.2 The tables below provide comments from NWP on specific aspects of the WG's Deadline 2 submissions considered of particular relevance to NWP.

**Table 5.1: Comments on the Welsh Government's Summary of Written Representations (REP2-368)**

Section	Relevant Text	NWP Comment
Draft DCO Requirements	<p>Key areas of focus for the WG include:</p> <ul style="list-style-type: none"> <li>DCO Requirements – use of tailpieces</li> <li>DCO Requirements – reliance on inadequate application documents</li> </ul>	NWP shares the concerns of WG with respect to the DCO requirements and has provided further detail in its submissions at Deadline 2.
Section 106 Obligations	<p>WG commits to working with <i>“other key stakeholders as part of a Team Wales approach...”</i></p> <p>WG has detailed concerns in respect of:</p> <ul style="list-style-type: none"> <li>WNMPOP</li> <li>Workforce Accommodation Management Strategy</li> </ul>	Whilst NWP share WG's concerns with respect to WNMPOP and WAMS, it does not believe that the Team Wales approach is as effective as suggested. To date, a number of documents have been shared by HNP with WG and IACC (e.g. draft s106 agreement and Terms of Reference for WNMPOP) that have not been shared with NWP. The ExA should therefore not assume that WG and IACC agreement with HNP on such matters constitutes agreement by Team Wales.
Education, Skills & Labour Supply	<p>WG concerns:</p> <ul style="list-style-type: none"> <li>Insufficient information on the definition of the workforce and the types of roles and skills required in the construction and operation of Wylfa</li> </ul>	NWP supports the concerns of WG, particularly around the need to define 'worker' as a DCO requirement. The correct definition of workers will be critical to the success of any monitoring of impacts and the need for contingency funding to be released. The lack of an appropriate definition at Hinkley Point C has created significant issues in terms of contingency

Section	Relevant Text	NWP Comment
	<p>Newydd;</p> <ul style="list-style-type: none"> <li>DCO requirement to define 'local', 'visitor' and 'worker',</li> </ul>	measures.
Transport & Infrastructure	<p><i>"Without appropriate intervention, both construction and operation traffic will exacerbate existing congestion on the trunk road network, have a detrimental impact on road users and local communities, and weaken response times of the emergency services."</i></p> <p>WG has requested the following requirements which must be attached to the DCO:</p> <ul style="list-style-type: none"> <li>Requirement for Abnormal Indivisible Load Management Plan and overarching Construction Traffic Management Plan outside of the Wylfa Newydd Code of Construction Practice.</li> <li>Accommodation of workers: The number living in the temporary worker accommodation must be monitored to demonstrate it will reach 4,000 workers by 2023 or corrective action must be taken.</li> </ul>	<p>NWP welcomes the concern expressed by the WG over the potential traffic impacts on the ability of the emergency services to fulfil their operational duties.</p> <p>NWP supports the additional management plans requested by WG but submits that NWP are an approving party with respect to the overarching Construction Traffic Management Plan and the Abnormal Indivisible Load Management Plan (if ExA supports WG request), along with the Code of Construction Practice. These plans must be agreed with IACC, WG and NWP before construction commences.</p>

**Table 5.2: Comments on the Welsh Government's Written Representations (REP2-367)**

Para.	Relevant Text	NWP Comment
<b>Section 3: Planning Obligations and DCO Requirements</b>		
3.1.3 – 3.1.5	<p>Additional necessary DCO requirements have been identified at the end of each topic specific chapter of this representation. The current draft DCO requirements are woefully</p>	<p>NWP agrees with this representation made by the Welsh Government. NWP has also identified additional requirements that need to be included within the draft DCO to secure detailed plans and schemes which address the issues relevant to NWP. In</p>

Para.	Relevant Text	NWP Comment
	<p>inadequate and often go no further than to require adherence to vague proposals contained within lengthy (and often unfinished) so called "control documents".</p> <p>The final DCO requirements must have clear, enforceable trigger points. WG also requests specific requirements included on important issues and matters clearly set out which must be contained within revised schemes to be approved pursuant to DCO requirements. These are highlighted in more detail at the end of each topic specific chapter of the WG's representation.</p>	<p>that regard, please see section 6 of NWP's Written Representations (REP2-345).</p> <p>The WG has suggested requirements in relation to:</p> <ul style="list-style-type: none"> <li>▪ Welsh Language and Culture</li> <li>▪ Education, Skills and Labour Supply</li> <li>▪ Economic development and supply chain</li> <li>▪ Tourism</li> <li>▪ Transport and infrastructure</li> <li>▪ Digital infrastructure</li> <li>▪ Health and wellbeing</li> <li>▪ Housing and accommodation strategy</li> <li>▪ Historic environment</li> <li>▪ Environment</li> </ul> <p>Of the above, those of most relevance to NWP are transport and infrastructure, health and wellbeing and the housing and accommodation strategy. As such, NWP has specifically commented on the WG's suggested requirements accordingly below.</p>
3.2.9 – 3.2.10	<p>The Code of Construction Practice ("CoCP") does not effectively secure WNMPOP. It does not include specific obligations or clear triggers (which you would expect to see in a section 106 agreement) relating to establishment and conduction of the Panel, or obligations relating to funding/resourcing of the various groups which public bodies are expected to actively participate in. These are all matters which should be secured in the section 106 agreement but are currently lacking.</p> <p>WG needs much clearer contractual commitments from Horizon (which can be relied on by WG) relating to the establishment, membership, operation and resourcing of the</p>	<p>NWP has yet to see the section 106 agreement or the terms of reference for WNMPOP and so has not been able to comment further on this, either here or in its Written Representations. NWP will be in a position to make more detailed submissions once it has sight of these documents.</p> <p>In relation to the WG's position, NWP agrees that a section 106 obligation should set out the detail of the establishment and conduction of the Panel and how the various groups that public bodies (including NWP) are expected to actively participate in will operate. NWP also considers that this can be achieved through an article in the DCO.</p> <p>NWP would draw attention to paragraph 6.8 to 6.21 of its Written Representations (REP2-345), where similar submissions have been made. NWP agrees that the composition and management/operational arrangements for the panel permeate</p>



Para.	Relevant Text	NWP Comment
	<p>WNMPOP and Sub-Groups and securing the terms of reference and dispute resolution mechanism.</p> <p>The proposed draft S106 also seeks to place obligations on the WNMPOP and sub-groups, yet those bodies will not be bound by the section 106 agreement. Welsh Government is not currently listed as a party to the agreement to sign up to these provisions.</p> <p>The WMNPOP should not have responsibility for the Community Fund allocation (which community groups can bid for).</p> <p>Horizon has previously proposed that one Community Liaison Group should be a member of WNMPOP. Whilst this and other community liaison groups should have a way of voicing concerns, the appropriate forum may not be the WNMPOP. Care needs to be taken over which bodies have a vote on WNMPOP, which is intended to be for strategic matters.</p>	<p>throughout all matters on which the project will have an impact.</p> <p>NWP has not yet seen the draft section 106 agreement. However its position is that other bodies, other than IACC, may be party to the section 106 as contractual parties to that document.</p> <p>NWP also expects to see detailed provisions regarding the establishment and conduction of the WNMPOP set out in the section 106 agreement, which the Panel will be bound by. NWP also considers that this can be achieved through an article in the DCO.</p> <p>NWP submits that the community fund allocation must be determined by the appropriate body for the funding purpose applied for. For example, NWP will form part of any panel, or board, responsible for determining any applications directly impacting on community safety.</p> <p>NWP must be involved in strategic decisions regarding community safety. If such decisions are being made via the WNMPOP, NWP needs to be able to have a vote where this relates to community safety.</p>
3.2.11	<p>WNMPOP and contingency funding cannot be used as a way for avoiding or reducing the level of mitigation provided at the outset for foreseeable impacts.</p>	<p>NWP agrees with this statement. It has prepared an Impact Assessment, which sets out the financial contribution required to mitigate the foreseeable impact on NWP.</p> <p>NWP's view is that the contingency fund's purpose is to mitigate any unforeseen effects (e.g. protest or an unforeseen emergency event) that cannot be assessed at this stage and therefore fall outside of the scope of the mitigation contribution requested by NWP.</p>

Para.	Relevant Text	NWP Comment
<b>Section 9.5.3 and 9.5.4: Transport and Infrastructure</b>		
This section sets out very detailed proposals on requirements and Section 106 obligations relating to transport and infrastructure. NWP is generally supportive of the submissions made by the Welsh Government.		
	Construction Traffic Management Plan (CTMP)	<p>NWP has also requested the submission of a standalone overarching CTMP at paragraph 6.42 of its Written Representation (REP2-345) and supports the request for an AIL Management Plan. Both these plans should be approved in consultation with NWP prior to development commencing.</p> <p>However, NWP submits that there should also be a standalone operation traffic management plan submitted to IACC for approval in consultation with NWP prior to first operation – this must be in accordance with the Code of Operational Practice.</p>
9.1.6.  9.3.18  9.4.7, 9.4.10 – 9.4.26	Integrated Traffic & Transport Strategy (ITTS)         Travel Plan	<p>As highlighted in section 3 of this submission, the WG has significant concerns over the assumptions in the ITTS with respect to the take-up of on-site accommodation and home-based working. WG is also concerned that the DCO and section 106 agreement lack adequate controls to secure these in practice which creates a risk of significantly greater impacts than those which have been assessed.</p> <p>The WG has also highlighted the lack of any sensitivity analysis within the ITTS and the potential implications for the project and the Travel Plan if these assumptions cannot be realised in practice.</p> <p>WG also consider that the Travel Plan lacks sufficient detail and sufficient commitment to delivery. It has benchmarked HNP's Travel Plan against that produced for Hinkley Point C to justify its concerns.</p> <p>The WG considers that the Travel Plan will be difficult to deliver given the rural nature of Anglesey and the lack of any formal binding obligation for workers to choose campus accommodation over off-site accommodation.</p>

Para.	Relevant Text	NWP Comment
		NWP shares the concerns raised by the WG, particularly with respect to the assumptions used by HNP to assess traffic impact and the apparent lack of any form of control mechanism to ensure that the assumptions can be realised.
	Accommodation of workers	<p>NWP supports the WG's proposals for more stringent monitoring of number of workers in temporary workers accommodation and who are living in the vicinity of bus routes.</p> <p>NWP submits that this monitoring must be undertaken in a robust and effective way and that HNP commit to that mechanism via a DCO requirement or the section 106 agreement. NWP consider that this undertaken through the Workforce Accommodation Management Service portal, the purpose and operation of which needs to be adequately secured through the section 106 agreement.</p>
	Travel Plan Officer	NWP supports the Welsh Government's proposal that the DCO secures the appointment of a Travel Plan officer. NWP consider the role of the Travel Plan officer to be crucial to the implementation of the Travel Plan and that the officer's role needs to be clearly defined through the section 106 agreement or DCO, particularly in explaining the officer's remit and how it will monitor and enforce the Travel Plan.
	Shuttle bus service	<p>NWP supports the Welsh Government's proposals on shuttle buses, the park and ride and parking in principle and submits that further details of these mitigation measures should be set out in a detailed Travel Plan. The Travel Plan should be secured through the section 106 agreement or a requirement in the DCO.</p> <p>NWP should be consulted on the Travel Plan by IACC prior to its approval.</p> <p>In relation to park and ride facilities, NWP</p>
	Park and ride at Dalar Hir	

Para.	Relevant Text	NWP Comment
	Parking at the WNDA	note that HNP is proposing one park and ride facility to accommodate the construction workers. NWP are concerned that only one facility to contain all construction workers is (a) not sufficient; and (b) does not appropriately disperse construction worker movements. In this regard, it is noted the Hinkley Point C (Nuclear Generating Station) Order 2013 secured four park and ride facilities.
	Freight	NWP supports the Welsh Government's proposal for the delivery of freight, monitoring construction traffic and delivery of the MOLF.  NWP made submissions on its concerns regarding the MOLF in more detail at paragraphs 5.38 to 5.46 of its Written Representations.
	Planning Obligations	NWP has not yet had sight of the section 106 agreement, but it supports the Welsh Government's proposals for: <ul style="list-style-type: none"> <li>▪ Mitigation and monitoring mechanisms to address impacts on the strategic highway;</li> <li>▪ Mitigation to alleviate traffic using Britannia Bridge;</li> <li>▪ Release of contingency funds being based on compliance with traffic management measures; and</li> <li>▪ Contribution towards strategic highway network costs.</li> </ul>
<b>Sections 11.4.4 and 11.4.5: Health and Wellbeing</b>		
	Site Campus Health Facility	NWP agrees that clarification is needed regarding requirement WN18 and that it should control occupancy until the Site Campus Health Facility is delivered.
	Community Safety Management Strategy (CSMS)	NWP has not had sight of the CSMS and agrees with the Welsh Government that it cannot comment on the proposed mitigation until it has been prepared, even if in outline. NWP request sight of this document as soon as possible.
	Health provisions	The proposal to secure specific financial mitigation for the impact on health provision for the non-home based workers mirrors the approach proposed by NWP in

Para.	Relevant Text	NWP Comment
		<p>Appendix 5 of its Written Representations to mitigate the effect on NWP due to the Project.</p> <p>NWP supports this proposal and agrees that authorities with a statutory duty should not have to meet the additional costs arising from the Project, particularly given that, ultimately, such monies are derived from the public purse.</p>
	Health and Wellbeing Sub-Group	<p>As above, this proposal to form a sub-group to monitor the impacts of the Project on health mirrors the proposal to form an Emergency Services Engagement Group (ESEG) by NWP in Appendix 5 of its Written Representations. The terms of reference for the ESEG should also be secured in the section 106 agreement.</p>
<b>Sections 12.5.7 to 12.5.27: Housing and accommodation strategy</b>		
	Temporary workers accommodation	<p>NWP agrees that the delivery of the temporary workers accommodation and a commitment to secure its full occupancy both need to be secured in the DCO.</p> <p>NWP has made representations on the lack of mechanisms securing this in its Written Representations at paragraph 7.11(v) (REP2-345).</p>
	Workforce Accommodation Management Service ( <b>WAMS</b> )	<p>NWP has the same concerns regarding the proposals for the WAMS as WG and whether it will generate sufficient data to monitor the impact on the housing market and agree all workers should be automatically registered with the WAMS. NWP expresses its general concerns regarding monitoring at paragraph 8.19 of its Written Representations.</p> <p>NWP will be reliant on monitoring data from WAMS to monitor the impact on police resources, as other statutory bodies will be reliant on this data to monitor impacts on their own services. As such, the way in which the data is collated needs to be robust.</p>
	Housing fund and contingency housing fund	<p>NWP supports the WG's proposals regarding the need for a clear plan for dealing with the distribution of workers where their planned distribution and the resulting outcomes for local residents are</p>

Para.	Relevant Text	NWP Comment
		<p>not as envisaged in the Workforce Accommodation Strategy.</p> <p>It is important to ensure that such contingency measures are in place as, if not, any unforeseen distribution of such workers could impact upon the allocated and use of police resources.</p> <p>NWP consider that if such impacts do occur (such as an increase in homelessness) and this results in an increase in use of police resources, that NWP are able to utilise part of the contingency housing fund to alleviate any such burden on resourcing. This would of course only be necessary if such an impact could be properly evidenced when applying for part of the housing contingency fund.</p>
	Monitoring arrangements	<p>NWP agrees with the WG's comments on monitoring arrangements. Capturing true worker numbers is crucial, but not just for impact on local housing markets and demand on tourism accommodation, but for impact on homelessness and community safety also. Therefore NWP require access to the workforce data and the Welsh Government's suggestions will improve the quality of that data.</p>
	Trigger points	<p>NWP has set out a review period and the possible need to release additional funds for mitigation in its proposed heads of terms to be included in the section 106 agreement (Appendix 5 of NWP's Written Representations). The Welsh Government's submission focusing principally on housing stress and trigger points, however general points are made concerning the use of trigger points in the DCO requirements. NWP agrees both submissions and those made at 3.1.4 and 3.1.5; specific triggers need to be documented and rendered enforceable.</p>
	Monitoring oversight	<p>The Welsh Government has suggested that key members of the WAMS Oversight Board should be:</p> <ul style="list-style-type: none"> <li>▪ Horizon Nuclear Power</li> <li>▪ Welsh Government</li> <li>▪ IACC</li> </ul>

Para.	Relevant Text	NWP Comment
		<ul style="list-style-type: none"> <li>Gwynedd Council</li> </ul> <p>It also suggests maintaining relationships with other accommodation support providers but does not mention NWP. Whilst NWP does not consider they should be part of the WAMS oversight board, access is required to the monitoring data generated by the WAMS.</p>

### Isle of Anglesey County Council

- 5.3 The table below provide comments from NWP on specific aspects of the IACC's Deadline 2 submissions considered of particular relevance to NWP.

**Table 5.3: Comments on the IACC's Written Representations (REP2-218)**

Para.	Relevant Text	NWP Comment
4.2	Definition of maintain	NWP agrees with IACC that the definition of maintain is too wide and has made similar submissions at paragraph 7.12(ii) of its Written Representations.
4.9	<p>Article 79</p> <p>IACC objects to tailpiece drafting. It asks that a general limiting provision is included specifying that any change applied for under any part of the DCO must not give rise to new or significantly different environmental effects from those assessed in the ES.</p>	NWP agrees with this submission and has made similar submissions regarding the extent to which the current proposed development is what has actually been assessed at paragraph 7.11 of its Written Representations. NWP also consider that it is important to ensure that all parties are aware of the specific version of the document or plan that is being adhered to and, in that regard, proper tracking and monitoring of those documents is required on an ongoing basis.
7.1.2	The IACC considers that the dDCO contains very few requirements for development of this complexity and scale being developed across multiple sites. The structure of the requirements means that development is heavily controlled by the various plans, in particular the CoCPs; comments on the CoCPs are given at section 11.	NWP agrees that there are very few requirements contained within the DCO for a development of this complexity and scale and has suggested numerous additional plans that it considers are necessary to address the impacts of the development at paragraph 6.42 of its Written Representations. These should be secured through requirements in the draft DCO.
7.2	The phasing strategy does not meet its key purpose.	NWP shares IACC's concerns surrounding the delivery of the MOLF and impacts on traffic impacts and would welcome such a

Para.	Relevant Text	NWP Comment
	It does not secure the delivery of the appropriate mitigation adequately – particularly the MOLF. IACC want to see a requirement which prevents the transportation of materials over the assessed amount until the MOLF is delivered.	requirement. There are detailed submissions in NWP's Written Representations on the MOLF at paragraph 5.38 to 5.46.
10.1(c)	<p>In relation to the scope of the specific mitigation and contingency/community funds....the nature of the changes that will be required are generally characterised as:</p> <ul style="list-style-type: none"> <li>a) Clarity on certainty and timing of trigger events.</li> <li>b) Avoidance of subjectivity in criteria for applying mitigation.</li> <li>c) The duration of any mitigation obligations.</li> <li>d) Flexibility in the application of specific mitigation sums within the overall objective identified.</li> <li>e) Full regard to the Proximity Principle in approaching mitigation.</li> <li>f) The ability to use underutilised mitigation funds where other mitigation funds have been shown to be inadequate.</li> <li>g) Review of the appropriateness of any "reasonable endeavour" clauses to secure objectives.</li> <li>h) Provisions of detail of plans/terms of reference not yet submitted but referred to in s106 Schedules, including (by way of illustration and not to be an exhaustive list as plans and schemes required may presently not be referred to in the draft s106): <ul style="list-style-type: none"> <li>i. Jobs and Skills Implementation Plan</li> <li>ii. WNESS</li> <li>iii. Supply Chain Action Plan</li> <li>iv. Worker Accommodation Management Service</li> </ul> </li> <li>i) As per comment above, payments for the benefit of third parties to be made to</li> </ul>	<p>In general NWP agrees with the heads of terms set out by IACC for the contingency fund arrangements, particularly (j); that the need for all heads of mitigation to have access to contingency funds. It is however important to note that the heads of terms proposed by HNP do not currently provide for NWP to benefit from the contingency fund. NWP disagree and consider it is important that NWP are able to benefit from the contingency fund.</p> <p>NWP does not agree that third party payments should all be made to IACC. As set out above, the section 106 agreement for Hinkley Point C (Nuclear Generating Station) Order 2013 provided for payments to be made directly to the emergency services and NWP submit that the same approach should be taken here. NWP also submits that it should be a party to the section 106 agreement, given the quantum of mitigation required by NWP and the need for a contractual enforcement mechanism with HNP. NWP's position regarding the section 106 agreement is set out in detail in Appendix 4 of its Written Representations.</p>



Para.	Relevant Text	NWP Comment
	<p>IACC.</p> <p>j) The need for all heads of mitigation to have access to contingency funds.</p> <p>k) Agreement to comprehensive standards of monitoring of effects.</p> <p>l) Ensuring adequate means of tackling potential default.</p>	
10.2.8 – 10.2.10	<p>IACC has consistently maintained that as enforcing body for the s106, it would expect to carry out on-going consultation and engagement with bodies that would be the ultimate beneficiaries of payments of mitigation sums and that IACC would be fully accountable to such bodies for the distribution of such sums to them.</p> <p>The constitution and operation of the WNMPOP however, as proposed by HNP, would move those third parties to equal status in the process of defining whether mitigation sums were due, for any purpose.</p> <p>There are obvious concerns that have been raised by IACC in the Examination already as to how IACC's role as enforcing body for the s106 could be reconciled with the delegation by it, jointly to other bodies, of future decisions on the extent of mitigation payments required of the Developer for which only IACC can be responsible as contracting part to the s106.</p> <p>The possible accommodation of a formal role for any third parties in the decision making process about how any or all of the future liability for mitigation payments is to be determined, is however the subject of on-going negotiations. IACC are participating in these negotiations without prejudice to these objections in principle.</p>	<p>NWP's position can be differentiated from this. NWP has requested specific mitigation for police resourcing in the form of a contribution. This is separate from the contingency funds and the WNMPOP and warrants NWP being a party to the section 106 agreement. This will allow it to more effectively monitor the adequacy of the mitigation. It can also enforce the contractual obligations directly against HNP, which is deemed necessary given the possible consequences if the mitigation funding is not received.</p> <p>NWP agrees that where a party applies for contingency funding, if that party is represented on WNMPOP, in the interests of procedural fairness that party should not play a role in deciding whether and how the funding should be awarded.</p> <p>Details of how and when funds should be allocated, including a set of criteria, need to be set out in the section 106 agreement.</p>
11.1(a)	The references in each	NWP agrees with IACC's statement. If

Para.	Relevant Text	NWP Comment
	Requirement to observance being " <i>....unless otherwise approved by the planning authority</i> " are not appropriate for documents with the status of a certified document.	HNP wish to make changes to documents as the development progresses, these should not be certified documents, but should be detailed documents secured by a requirement, which must accord with the outline document submitted. NWP's proposals are set out in more detail at section 7 of NWP's Written Representations.

5.4 With respect to the concerns raised by IACC in its draft SoCG (REP2-041) with HNP, NWP agrees with the points raised under the following SoCG IDs:

- IACC 0041 – Monitoring of Workers;
- IACC 0047 – Traffic Volumes – for NWP this relates to the purpose of monitoring;
- IACC 0048 - Car sharing (CoCP) – NWP advocates the need for monitoring;
- IACC 0055 - Workforce Accommodation (WAS and DCO);
- IACC 0091 - Mitigation - NWP shares this concern regarding the lack of assessment for a scenario that sees an alternative workforce accommodation split; and consequently, a lack of mitigation.
- IACC 0114 - Phasing Strategy (Transport) - concern shared by NWP, particularly in relation to the lack of cumulative considerations where the North Wales Connection project is concerned.
- IACC 0115 - Transport - NWP shares concern in relation to lack of scenario testing.
- IACC 0131 - Mitigation – Britannia Bridge

5.5 Within the draft SoCG with IACC (REP2-041), NWP has noted the following points on which it does not share the WG's views:

- IACC 0064 - Transport Fund Contribution – NWP notes reference to 'traffic enforcement'. NWP must be party to any discussions and agreement in relation to any fund that is intended to support its traffic enforcement services. NWP supports the need for a Transport Contingency Fund; but must be involved in detailed discussions surrounding how it will be distributed, managed and monitored.
- IACC 0128 - Ports requirements and considerations - NWP is concerned that Horizon has failed to consider a situation whereby the assumptions in relation to the use of the MOLF are not robust do not come to fruition

## Gwynedd Council

5.6 The table below provide comments from NWP on specific aspects of GC's Deadline 2 submissions considered of particular relevance to NWP.

**Table 5.4: Comments on GC's Local Impact Report (REP2-297)**

Para.	Relevant Text	NWP Comment
6.1.4 – 6.1.18	<p>There are a number of points / concerns raised by GC that are shared by NWP.</p> <p>GC also raise a number of important points with respect to the assumptions in HNP's traffic modelling in terms of the increased tourism traffic during the summer months and the traffic peaks from ferry passengers arriving at Holyhead.</p>	<p>The concerns raised by GC regarding the areas of principal concern from a highways impact perspective (A55, Menai Crossings, A487) are shared by NWP.</p> <p>NWP also shares GC's concerns regarding the underlying assumptions for the transport assessment and the ability of HNP to ensure these assumptions are accurate.</p>
6.4.14	GC raises significant concerns with respect to the timing and delivery of the on-site campus.	NWP shares these concerns, particularly given its understanding that the on-site worker accommodation at Hinkley Point C has yet to be completed due to a lack of demand for units.

#### North Wale Fire & Rescue Deadline 2 Submissions

- 5.7 The table below provide comments from NWP on specific aspects of North Wales Fire & Rescue's Deadline 2 submissions considered of particular relevance to NWP.

**Table 5.5: Comments on NWFRS Written Representations (REP2-344)**

Page	Relevant Text	NWP Comment
23	<p>Related Requirements (Conditions)</p> <p>a. NWFRS requires that a Traffic Incident Management Plan (TIMP) is agreed with the Local Authority and emergency services prior to the commencement of the main works.</p> <p>b. NWFRS requires that the Construction Traffic Management Strategy (CTMS) which will include the Distribution Management Asset Tracking System (DMATS) is agreed with the Local Authority and emergency services prior to the commencement of the main works.</p> <p>c. NWFRS requires that the</p>	<p>NWP agrees that the requirements suggested by NWFRS are necessary within the DCO.</p>

Page	Relevant Text	NWP Comment
	Community Safety Management Strategy (CSMS) is agreed with the Local Authority, the emergency service and other stakeholders.	

**Table 5.6 - North Wales Fire and Rescue Service - Response to ExA's First Written Questions (REP2-343)**

ExQ1	NWFRS Response	NWP Comments
<b>4.0</b>	<b>Development Consent Order – General Questions</b>	
Q4.0.114	<p>NWFRS understands that the developer will need to ensure that mitigation is in place to off-set known impacts that the proposed development will have on the community and/or existing services.</p> <p>NWFRS considers that an oversight board with responsibility for the monitoring of the impacts is appropriate, however the board should not sit under the auspices of the developer – it should be independent and be proactive in assessing adequacy of mitigation i.e. early intervention could be financially more prudent rather than reacting to a situation that has had a negative effect on the community.</p> <p>NWFRS recognises that the Local Planning Authority has a statutory function in relation to the implementation of section 106 agreements and that this cannot be circumvented.</p>	<p>NWP supports the need to ensure that mitigation is delivered and an oversight board is in place.</p> <p>However, NWP also considers that an ESEG is critical to ensuring the correct level of emergency services input to the monitoring process. NWP agrees with NWFRS that the board should be independent and be proactive in assessing adequacy of mitigation.</p> <p>NWP disagrees with NWFRS that IACC is the only party able to enter into the s106 agreement. NWP made detailed submissions as to why it is appropriate for NWP to be a s106 party (via an advice note prepared by Womble Bond Dickinson) in the Appendix to NWP's Deadline 2 submissions.</p>
Q10.6.3	<p>NWFRS agrees in principle with the list but notes that the final list is to be agreed by the Programme Board.</p> <p>NWFRS would suggest that data relating to all accidents and near misses inclusive of road traffic collisions (RTC's), fires and other injuries which involve construction staff is captured in order that trends or emerging issues directly attributable to this group can be identified. This will ensure that appropriate mitigation can be sought, from the applicant, to address issues.</p>	NWP share NWFRS' concerns with respect to the data required to identify emerging trends or needs for mitigation.

## Wales Ambulance Services Trust

- 5.8 The table below provide comments from NWP on specific aspects of Wales Ambulance Services Trust (WAST) Deadline 2 submissions considered of particular relevance to NWP.

**Table 5.7: Comments on WAST's Written Representations (REP2-363)**

Para.	Relevant Text	NWP Comment
2.3.12	We note the intention to use an EPCC Sub-Group to engage with the emergency services and the development of a Community Safety Management Strategy; we would ask that HNP expedite these discussions and production of relevant documentation to further assure us about the level of service provision on site.	NWP submits that the Emergency Services Engagement Group should be a standalone group, rather than a sub-group, whose role in monitoring the impact of the Project on emergency services and consulting on changes to any relevant plans or strategies is set out and secure within the section 106 agreement.  NWP is discussing mitigation proposals with the other emergency services and pro-actively engaging with WAST.
2.3.15	In addition to this, HNP should ensure that appropriate processes are put in place for the management of the Marine Off Loading Facility ( <b>MOLF</b> ) and should not expect WAST to retrieve or manage casualties within this environment.	NWP has made similar submissions on the MOLF and concerns regarding jurisdiction in its Written Representations at paragraphs 5.38 to 5.46.
4.2	...the LPA shall not approve a Community Safety Management Strategy ( <b>CSMS</b> ), major incident plan or any similar document without first obtaining the prior approval of WAST thereto.	NWP has also submitted that it must provide prior approval of the CSMS and several other plans before they are approved by IACC. Therefore the CSMS must be approved by both NWP and WAST before the requirement is discharged.

## **6 IN SUMMARY: THE DEVELOPMENT CONSENT ORDER AND SECTION 106 OBLIGATIONS**

### **DCO: General comments**

- 6.1 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.
- 6.2 NWP has reviewed the draft DCO (Revision 3) (REP2-020, REP2-021, REP2-022) submitted at Deadline 2 and note there are two changes that relate to the Written Representations made by NWP:
- i. Article 50 has been removed, which means NWP's comment regarding Article 50 at paragraph 7.11(iv) is no longer relevant; and
  - ii. The wording contained in Schedule 19 (Procedure for approvals and consents and appeals), "Further information" 2(2) (previously Schedule 18) allowed 7 business days and NWP had stated in its written representation that this did not allow enough time to properly respond. This period has been extended to 10 business days, which is now acceptable to NWP.
- 6.3 Revision 3 of the draft DCO does not address any other changes proposed by NWP and, in addition, no submissions have been provided by HNP as to why this is the case.
- 6.4 NWP made detailed submissions regarding the DCO and accompanying plans at section 7 of its Written Representations and having reviewed other interested parties Written Representations submitted at Deadline 2 (REP2-345), NWP note there is general consensus between the key stakeholders that:
- i. the DCO as drafted contains too few requirements for a development of this scale and complexity;
  - ii. the Code of Construction Practice and Sub-Codes of Construction Practice do not contain sufficient detail and is not fit for purpose;
  - iii. it is not appropriate to allow subsequent alterations to be made to certified documents following the grant of the DCO; and
  - iv. additional standalone plans are required prior to commencement or operation to secure adequate mitigation.
- 6.5 NWP still has fundamental and unresolved concerns in relation to the impact the Project will have on NWP and it is clear from reviewing the submissions made at Deadline 2, this is a position shared by several other interested parties, particularly the Welsh Government and IACC.
- 6.6 NWP submit that the DCO Requirements need to be redrafted to address the concerns expressed by the relevant interested parties in their Written Representations and further comments invited on the revised draft.
- 6.7 More detailed comments on the submissions made by the Welsh Government, IACC, Gwynedd Council, the NWFRS and the WAST are set out in Tables 5.1 -5.7 in the

preceding section.

### **Section 106 agreement: General comments**

- 6.8 NWP made detailed submissions on the section 106 agreement at section 8 of its Written Representations (REP2-345) and appended detailed Heads of Terms relating to obligations required to secure mitigation the impact the Project will have on NWP. It is noted the heads of terms submitted by NWP are similar to, albeit more detailed than, those proposed by the Welsh Ambulance Services NHS Trust at paragraph 4.2 of its Written Representations (REP2-363). Updated Heads of Terms for NWP are included in Appendix 2 to this statement.
- 6.9 It is noted that both IACC and the Welsh Government, being the only two parties to have reviewed a full draft section 106 agreement, commented on the lack of detail set out in the section 106 Agreement. NWP has requested to see a copy of the section 106 agreement from both HNP and IACC but has not yet been provided with one. NWP notes that a section 106 agreement draft was not submitted to the Planning Inspectorate at Deadline 2.
- 6.10 NWP notes both:
- i. IACC's position regarding the section 106 agreement and its role as the relevant planning authority to distribute funds as set out in paragraph 10.1(c); and
  - ii. The position of the North Wales Fire and Rescue Services who state in response the Examining Authority's First Written Questions at Q4.0.114 (REP2-343) that it *"recognises that the Local Planning Authority has a statutory function in relation to the implementation of section 106 agreements and that this cannot be circumvented."*
- 6.11 However, NWP's position differs. It does not agree that all payments should be made to IACC for distribution to third parties. In Hinkley Point C (Nuclear Generating Station) Order 2013, the planning obligations provided for payments to be made directly to Avon and Somerset Constabulary and NWP submit a similar mechanism is appropriate for the section 106 agreement relating to this Project. In order to enforce against a failure by HNP to make the payments or comply with any other obligations directly affecting NWP, it should also be a contractual party to the section 106 agreement.

## 7 CONCLUSIONS

- 7.1 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, the 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.
- 7.2 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.
- 7.3 This document has set out NWP's comments on the submissions made by the Applicant and Interested Parties at Deadline 2. The Applicant's Deadline 2 submissions have been reviewed to identify if any aspects of NWP's concerns raised in its Deadline 2 submission have been addressed. Where the concerns have been addressed, this is identified herein.
- 7.4 The submissions by other key stakeholders have also been reviewed to identify any areas requiring comment by NWP or any concerns that are shared with these parties. NWP has commented in this way to assist the ExA in identifying the key concerns of these stakeholders and the commonality between them. For the purpose of this submission, key stakeholders include:
- Isle of Anglesey County Council (IACC)
  - Welsh Government (WG)
  - Gwynedd Council (GC)
  - North Wales Fire and Rescue Service (NWFRS)
  - Welsh Ambulance Service Trust (WAST)
  - Betsi Cadwaladr University Health Board (BCUHB)
  - Conwy County Borough Council (CCBC)
  - North Anglesey Councils Partnership (NACP)
- 7.5 Overall, the concerns raised by NWP in its Deadline 2 submissions are maintained. Significantly, it is clear that the concerns raised by NWP are shared by a number of key stakeholders. These concerns relate to:
- The adequacy of the application documents;
  - The assumptions relied upon in the applicant's transport assessment and the associated lack of mechanisms in either the DCO or the draft s106 agreement to ensure the assumptions can be delivered in practice;
  - 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;
  - The potential impact of the project on the public sector and the need for appropriate mitigation to be secured for this through the s106 agreement;
  - The need for a formal approval process for the 'control documents' post the Examination but prior to the commencement of development on site;



- The establishment of an ESEG with a role across a number of relevant plans.
- The inappropriate use of tailpieces within the draft DCO requirements; and
- The inadequate detail provided in the draft control documents submitted to date by HNP – most notably, the CoCP, the sub-CoCPs and the CoOP.

7.6 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. These concerns are also clearly shared by a number of key stakeholders.

## Appendix

## **Appendix 1: North Wales Police: Police Impact Assessment – Road Policing Unit**



# Wylfa Newydd

## Police Impact Assessment

### Roads Policing Unit

**Compiled by:** Roads Policing Unit, North Wales Police

**Date:** 18<sup>th</sup> December 2018

Roads Policing Unit v1.0

Page **1** of **24**



## 1 INTRODUCTION

North Wales Police (NWP) Roads Policing Unit (RPU) is concerned about the effect of the Wylfa Newydd Power Station and has undertaken an assessment to clarify the functionality and capability that will be required during the construction phase and the on-going necessary commitment required during the operation of Wylfa Newydd as a nuclear generating station.

The various stages of the development programme will bring about varying challenges for the unit with each stage requiring differing levels of planning and engagement.

This note sets out the concerns of NWP and is structured as follows:

- Section 2 provides a brief overview of NWPs responsibilities;
- Section 3 sets out the perceived problems arising from the project;
- Section 4 sets out the proposed remedial measures;
- Section 5 summarises and concludes;
- Section 6 summary of requirement tables (including financials).



## 2 OVERVIEW OF NWP RESPONSIBILITIES

The RPU covers a large geographic area with a diverse demographic bringing with it different policing issues. Currently the Unit operates from four strategic locations across North Wales, namely Llandygai, Blaenau Ffestiniog, St Asaph and Deeside (moving to Llay early 2019).

This duty within RPU is provided through casualty reduction and to proactively support the Welsh Government's targets in reducing the number of people killed or seriously injured (KSI's) on our roads.

The unit support force priorities whilst observing the National Roads Policing Strategy of:

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

The Welsh Government Road Safety Framework for Wales published in July 2013 set the targets for casualty reduction which is to be achieved by 2020.

The targets set for 2020 are:

**Figure 2.0**

Welsh Government Targets
A 40% reduction in the total number of people killed and seriously injured on Welsh roads by 2020, meaning 562 fewer killed and seriously injured casualties.
A 25% reduction in the number of motorcyclists killed and seriously injured on Welsh roads by 2020, meaning 64 fewer motorcyclist killed and seriously injured casualties.
A 40% reduction in the number of young people (aged 16-24) killed and seriously injured on Welsh roads by 2020, meaning 139 fewer young people killed and seriously injured casualties.

RPU has been 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 measure first with a proactive and targeted enforcement. An effective 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 precautionary measures have taken place.

Road safety is of paramount importance alongside ensuring that the local communities remain safe and reassured during the duration of the build. Without adequate additional resources, the success achieved will not be sustainable during the Wylfa Newydd construction period.



### 3 PERCEIVED PROBLEMS ARISING FROM WYLFA NEWYDD NUCLEAR POWER STATION

This section sets out the key problems perceived by NWP in relation to the proposed Nuclear Power Station at Wylfa. These problems can be summarised as follows:

- Resilience of the existing highway network particularly the A55;
- Highway safety;
- Abnormal Indivisible Loads (AILs);
- Drug / drink driving offences;
- Driver fatigue;
- Level of crime increases.

#### Network Resilience

NWP are concerned about the effect of significant volumes of slow moving HGV traffic and construction worker traffic on the local and strategic road network. The concern is that these considerable extra vehicle movements over a period of 9 years will give rise to capacity issues at junctions and links on the local / strategic highway network and that consequently this will manifest itself in a higher propensity for overtaking manoeuvres, greater driver frustration increased number of shunt and Personal Injury Accidents,

The A55 runs for approximately 87 miles between Holyhead and finishing at the force border with Cheshire.

The current A55 /A494 Network Reliance Study WELTAG Stage 1 Report outlines that the A55 is currently nearing capacity or is at capacity with a series of pinch points across its length.

The WELTAG report states that

“The route however is vulnerable during incidents or significant road work events due to a combination of traffic volume, topographical and infrastructure constraints and lack of viable diversion routes. Sections of the route run close to capacity during normal traffic flows and are above capacity at peak times.”<sup>1</sup>

“There are a number of Strategic Diversion Routes (SDRs) and Tactical Diversion Routes (TDR) along the A55 and A494 corridor. SDRs include Trunk to Trunk Road diversion routes while TDRs are diversions via the county road network. Several of these routes are not suitable diversion routes and do not have the capacity to support the volume of traffic currently accommodated by the A55 and four of these are significantly longer than the corresponding A55 closure length.”<sup>2</sup>

The standards recommended by the Design Manual for Roads and Bridges (DMRB) for the minimum and maximum Average Annual Daily Traffic (AADT)<sup>3</sup> flows for sections of the A55 are nearing capacity or have already exceeded capacity; meaning that any additional traffic flow will exacerbate the existing issues. Britannia Bridge (J8 and J9) as well as the majority of the route east of J18 (Llandudno Junction) have ADDT flow approaching or outside the recommended range. At peak of construction, the vehicle movement associated with Wylfa Newydd and normal traffic increase could see the Britannia Bridge at capacity/outside the normal recommended flow.

<sup>1</sup> A55 / a494 Network Resilience Study WelTAG Stage 1 Report – Page 2, 1.4

<sup>2</sup> A55 / a494 Network Resilience Study WelTAG Stage 1 Report – Page 7

<sup>3</sup> A55 / a494 Network Resilience Study WelTAG Impact Assessment Report – Page 55, Table 17



Traffic crossing the Britannia Bridge is currently limited to 50mph and the bridge is subject to partial or complete closure in the event of high winds and adverse incidents.

The bridge is also a single lane carriageway which has the potential risk of capacity issues during periods of high demands. Other adverse incidents have taken place on the bridge with for example a HGV foreign national driver driving on the incorrect side of the carriageway resulting in a fatal collision.

The number of incidents involving individuals suffering from mental health issues has seen a continual increase from 2013. Three key locations were identified with one of these being Britannia Bridge. Adverse incidents have the capability to have significant impact especially on the confines on the bridge.

Typically, it takes RPU Officers on average around 40 minutes to deal with a typical breakdown incident; and dealing with a broken down LGV/HGV can take significantly longer. More vehicles, particularly HGVs related to Wylfa have the potential to worsen the situation and more policing is likely to be required.

### **Highway safety**

NWP is concerned that significant volumes of additional traffic over a substantial construction period of between 9-10 years will have a significant detrimental effect on highway safety through a general increase in the number of vehicles on the road, a significant increase in the number of slow moving HGV's, increased driver delay / frustration and a greater propensity for overtaking manoeuvres. All of this will add to the resourcing required by NWP to manage the network, to reduce the probability of accidents occurring and to deal with emergency issues occurring on the road network.

A review of the existing highway safety issues on the network has been undertaken by NWP using the Kernel Density Estimate Method<sup>4</sup> which depicts accidents using a colour coded heat map with red indicting high density and volume, yellow medium and blue low.

### **Injury and damage only collisions**

The A55/A494 Network Resilience Study WelTAG Stage 1 report<sup>5</sup> highlighted areas with a high level of injury collisions as:

- Britannia Bridge
- J16A – J20
- Rhualt Hill
- J33A-J33B

This is shown in **Figure 3.0**

<sup>4</sup> GIS and Crime Mapping by Spencer Chainey and Jerry Ratcliffe.

<sup>5</sup> A55 / A494 Network Resilience Study WelTAG Stage 1 Report – Page 20



**Figure 3.0 - Road Traffic collision Hotspots<sup>6</sup>**



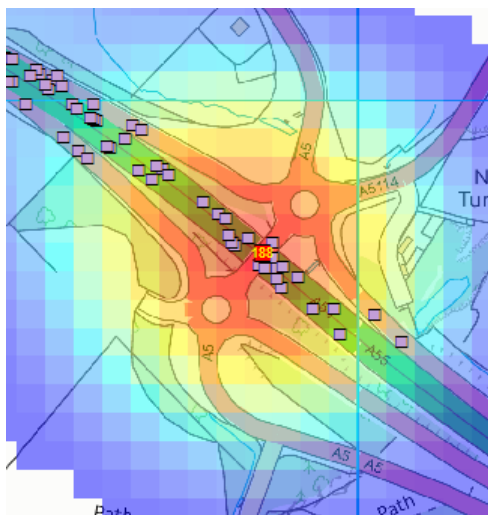
The Horizon Transport Assessment excludes damage only collisions and this raises significant concerns. Operationally, such incidents can take up an equal amount of time and resources to address as the more serious vehicle impacts. Given the importance of maintaining the free flow of traffic on the bridge, this is a considerable oversight.

Cluster Analysis conducted by NWP shows the Britannia Bridge as a site that has a number of injury collisions and damage only collisions. The bridge poses as a risk and sees a number of conflict locations (lane merging from two to one, on and off slips).

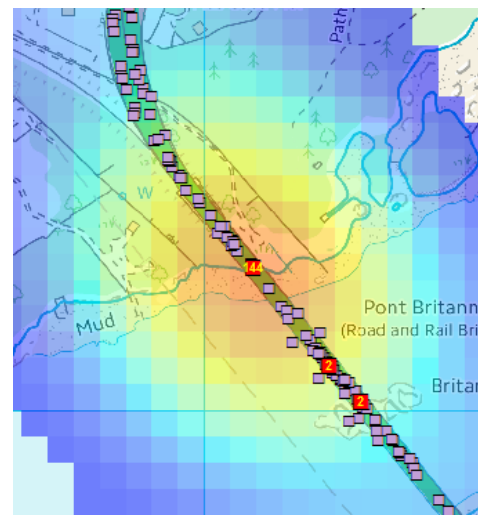
The A55 resilience report had already highlighted the bridge as one of the pinch points along with resilience issues should adverse weather or incidents take place at this location depicted through the heat maps.

**Figures 3.1-3.4** show the cluster accident density at A55 junctions 6, Britannia Bridge, A55 J10 and A55 Junction 11.

**Figure 3.1 – A 55 junction 6**

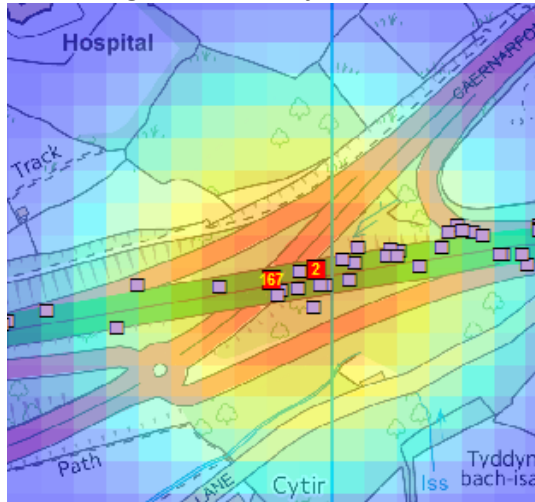


**Figure 3.2 – A55 Britannia Bridge**

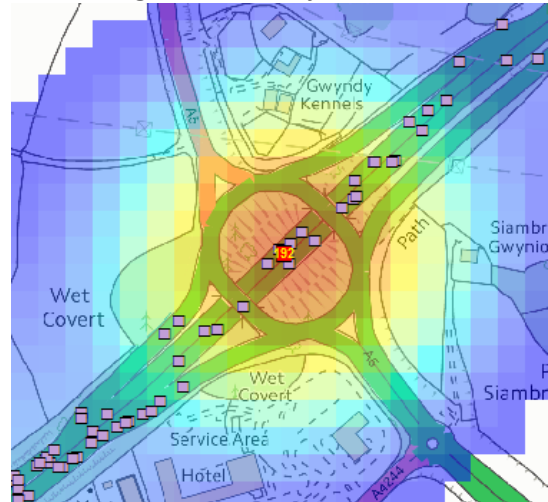


<sup>6</sup> A55 /A494 Network Resilience Study WelTAG Stage 1 Report – Page 14, Figure 2-3

### Figure 3.3 – A55 junction 10



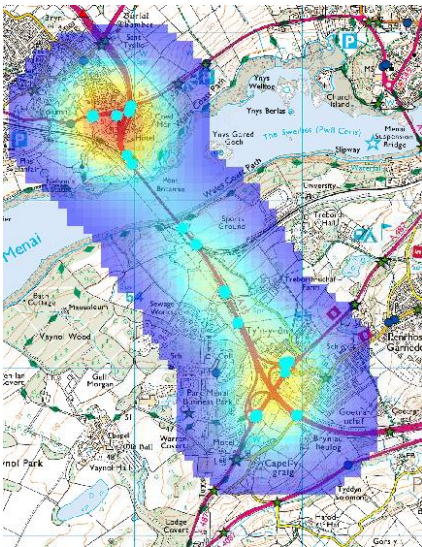
**Figure 3.4– A55 junction 11**



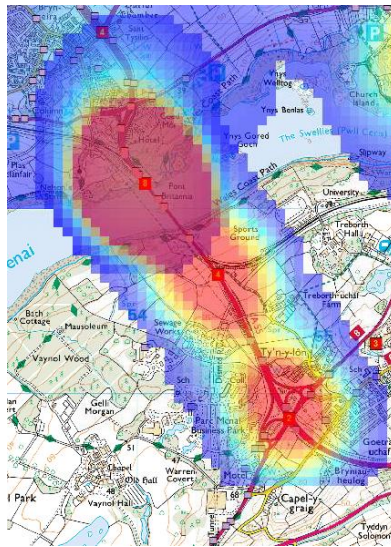
**Figure 3.5** shows the collisions mapped as Injury Only and Damage Only collisions

**Figure 3.5 – Injury only and Damage only collisions Britannia Bridge**

## Britannia Bridge Injury only collisions



Britannia Bridge Damage only collisions



Notably, Horizon's TA only assesses accidents in terms of injury only and does not include damage only. Clearly there is already a serious issue of damage only accidents at and on the approaches to Britannia Bridges which will only be exacerbated by significant increases in construction traffic vehicles and HGVs. Dealing with this issue will require additional police resourcing.

Figure 3.6 shows the Injury and Damage only collisions on Anglesey.

Figure 3.6 – Injury and Damage only collisions Anglesey



The NWP's data shows that the number of Killed or Serious Injury (KSI) collisions on Anglesey has seen a continual increase since 2015 and despite significantly smaller populations and lower traffic levels, Anglesey's KSI stats in 2017 are higher than in Wrexham and on par with the county of Flintshire. In other words, it has a significantly higher proportion of KSI accidents than other adjacent areas.

The increased number of vehicle movements on the A55 and A5025 due to the construction at Wylfa has the potential to increase the risk of accidents occurring attributable to a greater number and slower, larger vehicle movements on the network. This increased risk is made more significant by the change in the profile of the mode of vehicle (HGV and LGV's) and workforce demographics which will pose a greater risk to other road users and the communities along the route.

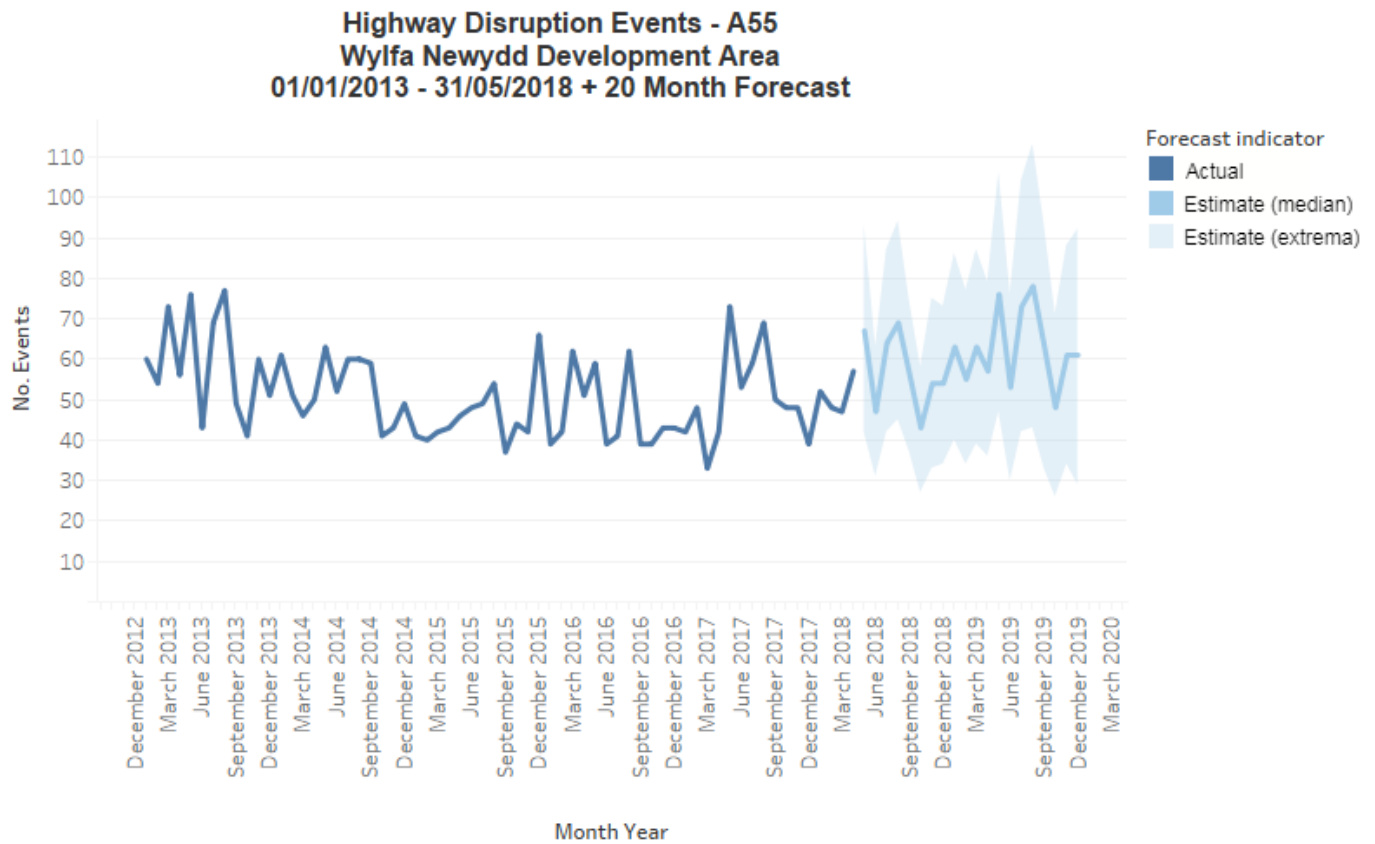
The improvements to the A5025 once completed may also allow motorised traffic to travel at a higher average speed and would require enforcement to ensure compliance.

Figure 3.7 sets out forecast of highway disruption events by NWP<sup>7</sup>. It was generated by NWP to predict any future patterns for Highway Disruption events for the section of the A55 that falls within the Wylfa Newydd Development Area. The time period for the baseline data used was 01/01/2013 – 31/05/2018 and the forecast was generated for 20 months until the end of December 2019.

<sup>7</sup> ICAD incidents NWP



**Figure 3.7 Highway Disruption Events**



This prediction infers the volume of highway disruption is likely to increase without any change in the flow of traffic i.e. background traffic growth. The significant quantum of additional traffic associated with Wylfa Newydd is likely to further increase this volume of disruption.

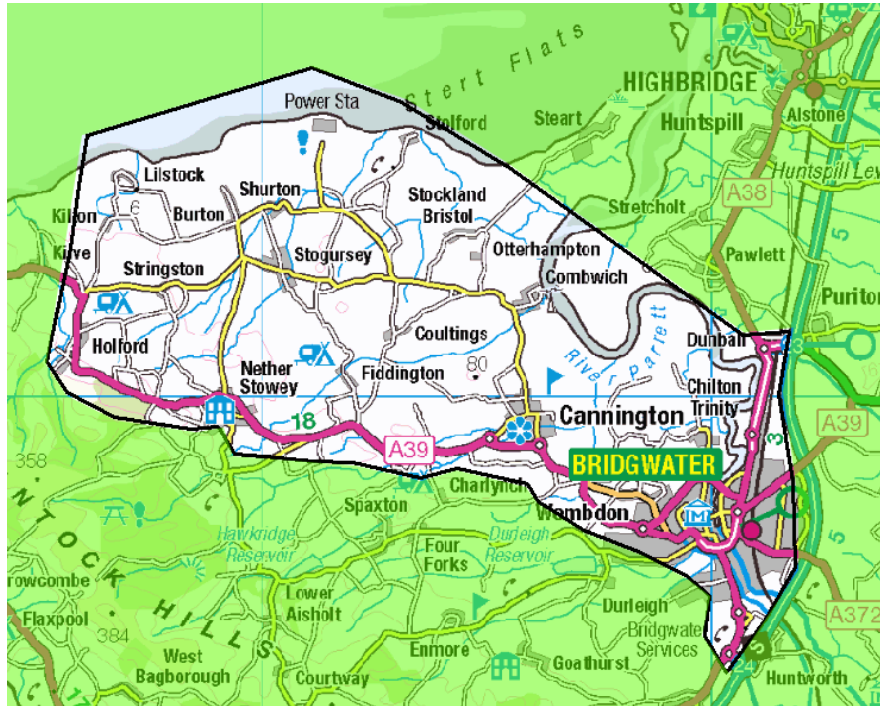




### Injury Collisions Area Hinkley Point – Avon and Somerset Police<sup>8</sup>

As a comparison, Avon and Somerset has provided details of all injury collisions that have occurred within the area of Hinkley Power Station over the last five years. The request was made specific to the polygon area illustrated in **Figure 3.8** and covered an area of approximately 40 sq. km.

**Figure 3.8 – Hinkley Point accident request polygon**



It is clear from the figures provided, that Avon and Somerset have seen an increase in the number of injury collisions and in particular the number of fatal collisions. These fatalities occurred on the A class roads namely the A39 and A38, which are the primary route to the power station.

Since the start of construction, road fatalities have also increased on minor routes as staff members who work at Hinkley Power Station have deviated from the specified routes that are part of the requirements for Hinkley staff.

The peak workforce at Hinkley is significantly lower than that expected to be seen at Wylfa, with staff at Hinkley amounting to some 5,600 people employed on site at peak of construction, compared with Wylfa seeing 9,000 people being employed on site at peak construction. It is presumed that without the proposed proactive increases in policing measures during the construction at Wylfa Newydd collision numbers will be higher than currently seen at Hinkley.

<sup>8</sup> Appendix A Freedom of Information Avon & Somerset Police



## Abnormal Indivisible Loads – AILs

The construction of Wylfa Newydd will require Abnormal Indivisible Load (AIL's) road network transportation and their movement will require adherence to the specific legislation.

Any intended Abnormal Load movement 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 advance working days (including Saturdays) notification is required.

It is anticipated that the largest AILs, such as Power Station components, are to be delivered using the MOLF during the nine-year construction programme. A further 1,150 AILs are likely to be transported via the road network. Of this number, Horizon estimate 650 would require an 'abnormal load order'<sup>9</sup> but not an escort, and the **remaining 500** would require an 'abnormal load order' and special arrangements including escort. These arrangements are considered in the Code of Construction Practice (see Chapter 13).

It is expected that the peak in AIL by road activity would occur in the **first two years of construction (i.e. 2019-2021)**, when an average of approximately **12 AILs are expected per week**.

It should be re-iterated that the off-line highway improvement works are not scheduled to be complete until Quarter 4 2020, meaning AILs will use the existing A5025 for two years. Any overrun on builds/delays for the A5025 works (on-line and off-line) will cause extra congestion and significant risk to road users in that time.

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.

NWP 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.

Road safety is a shared responsibility between Welsh Government, the Unitary Authorities, Fire/ Rescue Service and Police.

In order to ensure the safe movement of abnormal loads associated with the Wylfa project, North Wales Police needs to be in a position to have suitably trained staff and equipment to meet those demands.

Abnormal loads present an increased risk due to their size and/or weight. Where a load is of an exceptional dimension, or the route poses greater risk to other road users, police escorts may be provided.

Only specially trained police officers with a sound knowledge of escorting or convoy duties are permitted to be used to assist in the movement of AIL's.

In North Wales it has been recognised by NWP, the Welsh Assembly Government and private industry, including the energy sector, that it is an established practice for AILs to be escorted by the Police.

NWP needs to provide fully trained resources to cover the cost of ensuring that AILs are transported across the local / strategic highway network will as efficiently as possible to mitigate against delay and highway safety.

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<sup>9</sup> Horizon Transport Assessment 7.6.12



## **Drug / Drink Driving offences**

### Drug Driving Offence<sup>10</sup>

The number of arrests has seen a continual increase on the Island since the introduction of new capabilities of assessing a suspect/s abuse of illegal drugs whilst driving.

The number of suspects arrested for a Section 5a drug offence residing within the postcode area of LL65 (Holyhead / Cemaes) on Anglesey currently ranks 5<sup>th</sup> highest in North Wales, with the third highest within the postcode area of LL57 in Gwynedd North.

The use of cannabis for recreational purposes is prohibited in most countries; however, many have adopted a policy of decriminalisation to make simple possession a non-criminal offence (often similar to a minor traffic violation). Others have much more severe penalties such as some Asian and Middle Eastern countries where possession of even small amounts is punishable by imprisonment for several years. An influx/ increase of construction workers from other countries could therefore see a dramatic escalation in arrests and road accidents associated with drivers being under the influence of drugs.

### Drink Driving Offence

Horizon estimates that there will be in the region of 1700 staff who will come from outside the UK. Drivers from Eastern European countries or other parts of the world may be less aware of drink-driving laws in the UK. An FOI request made in 2016 to the Driver and Vehicle Licensing Agency (DVLA) revealed that a total of, 273,498 drivers have been banned from the nation's roads over the previous five years after being convicted of a drink-driving offence. The worst drink driving areas were linked to towns with large number of migrants. The penalties are also much stricter in the UK, which deters people from drink-driving. The severity of punishment is not the same in some European countries. Research has shown that a large influx of foreign nationals can contribute to a substantial increase in drink-drive offences an example of which occurred in Cambridgeshire<sup>11</sup> which saw an increase of 381% from 2005-2008.

The then Chief Constable of Cambridgeshire Julie Spence OBE QPM sought an upturn of 100 police officers as a consequence of the influx of foreign nationals in to the county and the significant impact to policing that they created. She subsequently gave evidence at the Home Affairs Select Committee (HASC) on this subject following a surge of media and political interest at the time.

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<sup>10</sup> North Wales Police RMS arrest figures

<sup>11</sup> Drink Driving UK FOI to DVLA. [Boston](#) (PE21) in Lincolnshire came second, with 598 drivers being stripped of their licence. The town has been dubbed "the most segregated in the UK" after a census revealed the town has the most Eastern European population in the UK. Also in the top 10 was Peterborough (PE1), which has a large migrant community from Lithuania, Latvia and Poland, with 589 banned motorists. Cambridgeshire market town Wisbech (PE13) rounded off the list with 470 losing their driving license. Around one third of the town is from Eastern Europe. East Anglia has a lot of manual worker and agricultural works from Eastern European. There are cultural factors in the way people approach drink driving and Europe has a different approach to enforcement compared to the UK

[http://news.bbc.co.uk/1/shared/bsp/hi/pdfs/19\\_09\\_07\\_camb\\_police.pdf](http://news.bbc.co.uk/1/shared/bsp/hi/pdfs/19_09_07_camb_police.pdf)

<https://publications.parliament.uk/pa/cm200708/cmselect/cmhaff/364/8060303.htm>



## Driver Fatigue<sup>12</sup>

Driver fatigue is a serious problem resulting in many thousands of road accidents each year. It is not possible to calculate the exact number of sleep related accidents but research shows that driver fatigue may be a contributory factor in up to 20% of road accidents, and up to one quarter of fatal and serious accidents.

These types of collisions are approximately 50% more likely to result in death or serious injury as they tend to be high speed impacts as a driver who has fallen asleep cannot brake or swerve to avoid or reduce the impact. The main collisions caused by tiredness include:

- on long journeys on monotonous roads, such as motorways
- between 2am and 6am
- between 2pm and 4pm (especially after eating)
- after having less sleep than normal
- after drinking alcohol
- if taking medicines that cause drowsiness; and
- after long working hours or on journeys home after long shifts, especially night shifts.

Drivers who are most at risk and who form part of the workforce profile for Wylfa are:

- young males
- HGV drivers; and
- shift workers who are the most at risk of falling asleep whilst driving

It is difficult to quantify the full impact fatigue has had within North Wales. However it was possible to determine that between 2013-2018 there were 106 injury collisions of which 36 drivers were either killed or seriously injured. Of these, 39% of injury collisions were attributed to the driver commuting to or from work or the journey as part of work. 22.2% of those (commuting) figures were killed or seriously injured.

As such, the additional traffic, HGV movements and composition of HGV drivers and shift patterns may lead to an increasing number of Personal Injury Accidents on the local and strategic road network all of which will contribute to a greater propensity for accidents and greater levels of policing.

## Level of Crime Increase<sup>13</sup>

A North Wales Police Analysts Model<sup>14</sup> estimates that the population increase associated with the Wylfa Newydd project will result in a 7.8% increase in crime and 6.1% increase in incidents and non-crimes across the area of Anglesey and Gwynedd North by 2023.

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<sup>12</sup> ROSPA – Royal Society for the Prevention of Accidents

<sup>13</sup> C01 Socio-economics, 1.3.16,

<sup>14</sup> Appendix A LPS Assessment of Impact Demand





RPU constables deal with investigations relating to both crime and non-crime occurrences, with road offence process (speeding, use of mobile phone, using vehicles without insurance etc.), RTCs and drink/drug driving offences accounting for the majority of active investigations. However, RPU officers are also dealing with fraud, vehicle crime, and violence investigations.

The projected increase in crime and incidents would therefore require additional resources within RPU, as the additional investigative workload could not be absorbed by RPU without detriment to other areas of roads policing, nor could any spill over be absorbed by the Local Policing Services frontline.

## **4 REMEDIAL MEASURES**

The following section sets out what NWP require in order to mitigate the effect of the problems identified in the previous section relating to the construction of Wylfa Nuclear Power Station

### ANPR

Automatic Number Plate Recognition (ANPR) technology is used to help detect, deter and disrupt criminality at a local, force, regional and national level, including tackling travelling criminals, Organised Crime Groups and terrorists. ANPR provides lines of enquiry and evidence in the investigation of crime and is used by law enforcement agencies throughout England, Wales, Scotland and Northern Ireland. In addition to being mounted within police vehicles.

Some average speed cameras are now also equipped with ANPR capabilities and could be located in areas that will ensure the compliance of safe driving speeds and also the compliance of workers in following the contractors agreed route in and out of the Wylfa Newydd site as per the planning application.

Some other benefits that will derive from the use of ANPR cameras:

1. Reduces risk and harm to local communities.
2. Reduce risk and harm to the Wylfa site with regards to possible threats around terrorism and protests
3. Reduce criminality use of the roads

### Camera locations

National guidelines state that, 'if a police force proposes to install additional ANPR cameras, an assessment must be conducted that demonstrates a clear need, taking account of the following factors':

- National security and counter terrorism;
- Serious, organised and major crime;
- Local crime;
- Community confidence and reassurance, and crime prevention and reduction.



### Proposed Locations

Having considered counter terrorism, road safety and criminality, twenty (20) camera locations have been identified for the installation of ANPR and average speed cameras (with ANPR capability) in order to reduce the risk to the residents of North Wales. The installation cost varies per location and is dependent on what services and structures are available or required.

Public disclosure of existing and proposed ANPR camera locations would reduce their effectiveness, therefore that detail has been removed from this report. NWP is willing to share the proposed locations with HNP and the Examining Authority under a separate restricted security classified document if requested.

Average speed camera locations have been based on collision data on the roads leading to the new Wylfa site, predominately the A5025 Valley to Wylfa Newydd site and the A5025 Amlwch to Wylfa Newydd site. However it should be noted that only a small number of the historic collisions have been attributed to 'speed' along the A5025, and this report does also take into account the improved road infrastructure, increase of traffic movement and compliance of those drivers as a result of the new development; Therefore in addition to the collisions data, the average speed cameras have also been suggested in areas that will ensure the compliance of safe driving speeds and also the compliance of workers in following the contractors agreed route in and out of the Wylfa Newydd site as per the DCO application.

Average speed cameras along the length of the A5025 will ensure safer roads for both contractual workers and local residents. No off line work is scheduled to take place along the A5025 between Cemaes and Amlwch, this section of road has claimed the lives of a number of people over the years and is still recognised as a location where serious and slight injury collisions are taking place. Robust enforcement through the use of technology is required to negate this risk and also to minimise the amount of construction workers using non specified routes to the site.

### Calculating Resource Requirements

North Wales Police utilise a number of resource modelling methods and tools to calculate resource requirements for the different functions of the organisation.

These can be used to forecast changes to resource requirements given an anticipated change in policing demand.

For frontline officers and staff, resources levels are required to meet four fundamental criteria:

- Ensure public safety
- Maintain officer safety
- Deal with incoming demand
- Deliver proactive activity.

These criteria fall under two key categories; coverage and demand as set out in **Figure 4.0**.



**Figure 4.0 Frontline Resource Requirements.**



At the most basic level, resources are required to provide adequate coverage in order to maintain public and officer safety. This level of resource ensures the police can respond as required to emergency calls for service from the public, and that rotas can be staffed appropriately to mitigate risks to officers.

The level of resource required to provide suitable coverage may not be the same as the level required to deal with overall demand.

This level of resource is what is required to deal with incoming demand over and above immediate and priority calls for service, taking into account the workload generated by slow time demand, investigative demand and the delivery of proactive tasks such as patrol, stop search and community engagement.

Separate resource models are built to assess coverage and to assess demand, but their results are evaluated concurrently in order to recommend an overall resource requirement.

#### Wylfa Newydd Roads Policing Deployment Requirements

A number of requirements have been identified to continue to facilitate RPU cover across the North Wales Police area to effectively deal with the additional volume of traffic, congestion and inherent associated road safety issues, incidents and road delays associated with large numbers of additional vehicle movements associated with Wylfa. These requirements have been identified using a robust evidence base supplemented by professional judgement.

The Unit would seek to increase the Operational Roads Policing establishment (excluding dedicated Abnormal Loads Team which would require 1 Sergeant and 6 Police Constables) at peak to consist of 1 Inspector, to oversee the unit, 24 Police Constables and 1 Police Support Staff.



This option would see a four team rota system which would consist of a total of 24 Police Constables who would be amalgamated within the current rota system in place meaning it would not require any additional supervisors. These officers would be overseen by an additional Inspector post and supervised utilising the current structure of 2 Sergeants per rota. Within each of the four rotas there would be a Police Constable dedicated as a 'Commercial Vehicle Officer' who would ensure the compliance of HGV associated with the build. The Commercial Vehicle Officers should be in place prior to peak HGV movements in year 2. This process will allow the Officers to be mentored and integrated with the experienced Roads Policing Officers as a one team ethos.

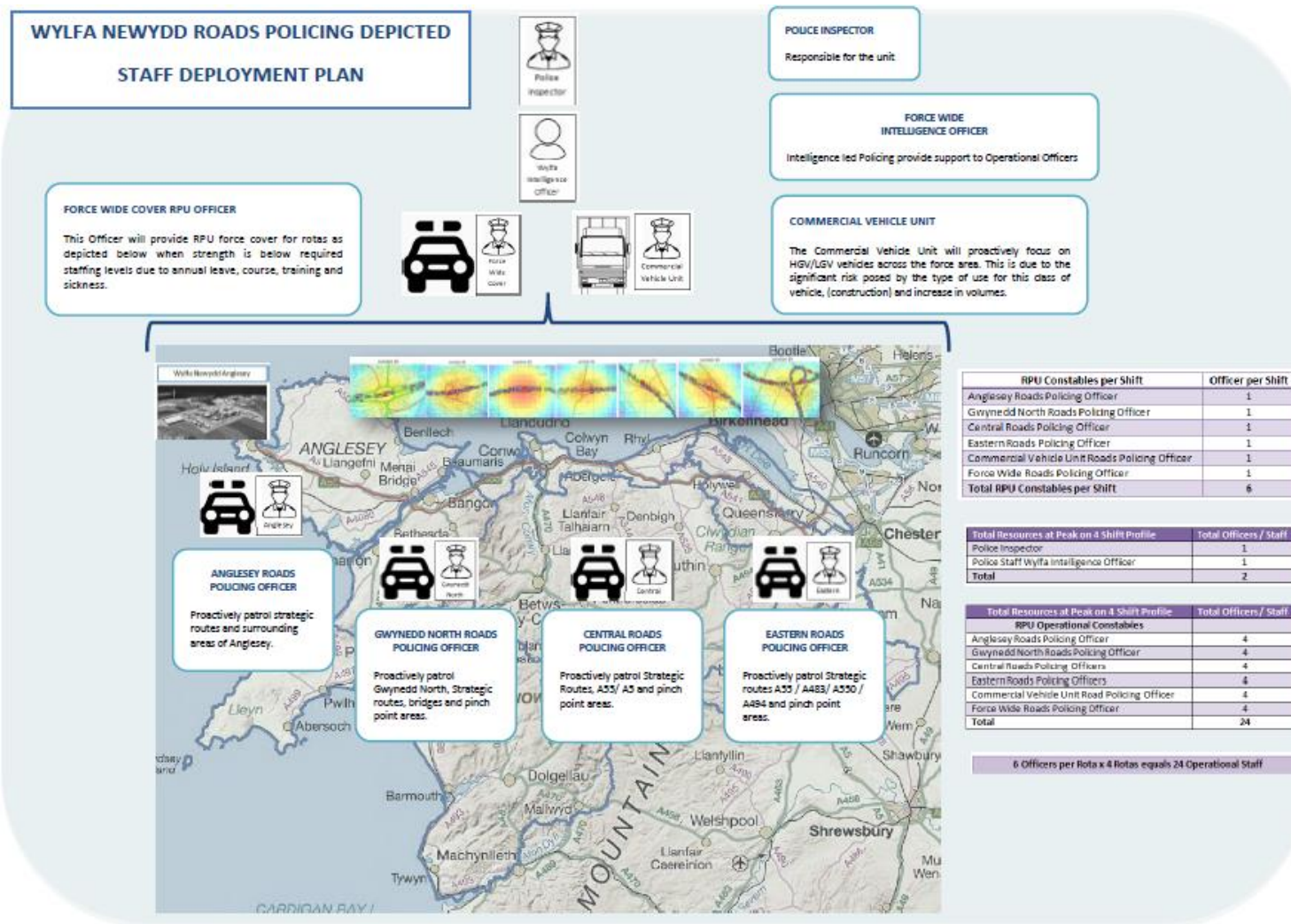
The additional RPU officers will be trained to the required national standard and their numbers being dictated by a demand led tapering process peaking at year 5 as per **Figure 6.1**.

In order to support this increase in resources, additional vehicles, training staff and associated costs will be required. The total requirement to deliver the RPU response including FTE and infrastructure is detailed in the tables in **Section 6**.

The deployment of the required additional resources are summarised in **Figure 4.1**.



**Figure 4.1 Staff Deployment Plan**





In addition, there will be additional NWP resource requirement to support AILs.

There are two options available to deal and resource with movement of AILs that require a police escort, Option A - a dedicated AIL team, or Option B, based on a NWP cost per day

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

1 x Sergeant

6 x Police Constables

1 x Police Support Staff

The Abnormal Loads Team (ALT) would be dedicated to the movement of any abnormal indivisible load required as part of the Wylfa Newydd work, on and off site. The team would consist of five Police Constable Motorcycle Riders, one Police Constable Vehicle driver and a Sergeant. This Team would need to be in place at the commencement of the build with an initial tenure in post until peak construction. The newly formed ALT would be solely responsible for all requisite AIL movements with no additional costs being incurred. The annual costs for the team would be in the region of £608,638<sup>15</sup>

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.

It is important to note that this option would require a minimum of 12 months' notice in order to adequately train and recruit the required number of ALT Officers to be simultaneously in place and ready for the projected AIL movements.

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

The movement of any abnormal indivisible loads under police escort costs in the region of £5,126<sup>15</sup> per movement (Day/2). The cost of establishing a dedicated team would be a more cost effective option for Wylfa weighed against the cost per movement, based on an average movement of 2 abnormal loads a day.

With this option, NWP could not guarantee that the resources would be available when required as there are already substantial contractual arrangements in place for projected AIL movements outside of the Wylfa Newydd building programme with the current limited existing resources and predicted time scales of the construction.

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<sup>15</sup> Costs are based on the 2018/19 prices and will need to be uplifted for inflation





## 5 SUMMARY AND CONCLUSION

Road Safety is of paramount importance, together with ensuring that local communities are safe and reassured during the duration of construction. The construction of Wylfa Nuclear Power station will give rise to a significant amount of HGV and construction worker traffic over a period of 9 years thereby significantly increasing the risk to highway safety.

The NWP RPU will provide the much needed visible policing presence as a preventative measure first, together with a robust enforcement strategy which is required to mitigate any risk and ensure compliance on the road network, and compliance of the Wylfa Newydd workforce in accordance with the planning application.

In summary, NWP require an operational roads policing establishment at peak to consist of 1 Inspector, to oversee the unit, 24 Police Constables and 1 Police Support Staff as set out in **Figure 6.1**. In order to support this increase in resources, additional training staff and associated costs will be required. The total requirement to deliver the RPU response including FTE and infrastructure is detailed in the tables in **Section 6**.

In addition, there are two options available to Horizon to deal with and resource and movement of AILs that require a police escort:

1. Option A: Dedicated Abnormal Loads Team
2. Option B: Cost per day

Support of this reasoned recommendation will result in the NWP RPU being in a position to continue to effectively police the road networks and communities of North Wales. It will also ensure a prompt and professional response in dealing efficiently and expertly with the significant increase in vehicle movements and the indisputable projected unforeseen temporary road network delays, whilst concurrently providing the specialised and necessary speedy and safe escort of the substantial anticipated increase in wide load movements.



## 6. SUMMARY OF REQUIREMENT TABLES (including FINANCIALS)

### Assumptions

Capital has been broken down into four separate elements:

- a. Facilities
- b. Vehicles
- c. Equipment
- d. IT

#### **a. Facilities**

No facilities costs for RPU

#### **b. Vehicles**

One types of vehicle will required to be purchased for RPU/Driver Training:

- i) RPU BMW Marked with a Replacement Cycle of four years

The following table highlights:

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





**Figure 6.0**

	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>										
RPU BMW Marked	5	4	2	2	0	0	0	0	0	0
<b>Initial Vehicles Purchased</b>	<b>5</b>	<b>4</b>	<b>2</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Replacement Vehicles</b>										
RPU BMW Marked	0	0	0	0	4	4	2	1	0	0
<b>Replacement Vehicles</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>4</b>	<b>4</b>	<b>2</b>	<b>1</b>	<b>0</b>	<b>0</b>
<b>Overall Vehicles Purchased</b>	<b>5</b>	<b>4</b>	<b>2</b>	<b>2</b>	<b>4</b>	<b>4</b>	<b>2</b>	<b>1</b>	<b>0</b>	<b>0</b>
<b>Total Vehicles Available</b>	<b>5</b>	<b>9</b>	<b>11</b>	<b>13</b>	<b>13</b>	<b>12</b>	<b>12</b>	<b>11</b>	<b>7</b>	<b>3</b>

The RPU BMW Marked requirements are based on existing RPU Vehicles to Staff ratio of 1 to 2.5 FTE members of staff with two vehicles each designated for the Commercial Vehicle Unit and Driver Training.

### c. Equipment

RPU have evaluated the number of ANPR Cameras and Average Speed Cameras with ANPR capability across the Isle of Anglesey to for both Counter Terrorism, road safety and to combat criminality.

Requirement specified is 20 cameras @ indicative cost of £30k to procure and install each camera (location dependent), significant upfront investment but replacement cameras running at £6-10k. Build in replacement in Years 6.

The equipment costs predicated on requirement for ProLaser (speed measurement) equipment within the Road Policing vehicles

### d. IT Costs

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 built into Ex-RPU element



**Figure 6.1 - 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
d. Road Policing Unit - RPU and Commercial Vehicle Unit	9	18	22	26	26	26	26	22	9	9
k. Training	2	3	2	2	1	1	1	1	1	1
<b>Total Core Policing Requirement FTE</b>	<b>11</b>	<b>21</b>	<b>24</b>	<b>28</b>	<b>27</b>	<b>27</b>	<b>27</b>	<b>23</b>	<b>10</b>	<b>10</b>

**Figure 6.2 - Core Policing Resourcing 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
d. Road Policing Unit - RPU and Commercial Vehicle Unit	455	868	1,059	1,250	1,250	1,250	1,250	1,059	455	455	<b>9,351</b>
k. Training	96	143	96	96	48	48	48	48	48	48	<b>717</b>
<b>Resourcing Costs £k</b>	<b>551</b>	<b>1,011</b>	<b>1,154</b>	<b>1,346</b>	<b>1,298</b>	<b>1,298</b>	<b>1,298</b>	<b>1,107</b>	<b>503</b>	<b>503</b>	<b>10,068</b>
Overheads @ 30%	165	303	346	404	389	389	389	332	151	151	<b>3,021</b>
Exit Costs								130	130	130	<b>389</b>
<b>Total Costs £k</b>	<b>716</b>	<b>1,314</b>	<b>1,501</b>	<b>1,749</b>	<b>1,687</b>	<b>1,687</b>	<b>1,687</b>	<b>1,568</b>	<b>784</b>	<b>784</b>	<b>13,478</b>

**Figure 6.3 - 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	0	0	0	0	0	0	0	0	0	0	<b>0</b>
b. Vehicle Costs	209	167	84	84	158	158	80	38	0	0	<b>978</b>
c. Equipment Costs	642	0	0	0	0	300	0	0	0	0	<b>942</b>
d. IT Infrastructure	17	15	5	6	15	15	5	0	0	0	<b>77</b>
<b>Total Costs £k</b>	<b>867</b>	<b>182</b>	<b>89</b>	<b>90</b>	<b>173</b>	<b>473</b>	<b>84</b>	<b>38</b>	<b>0</b>	<b>0</b>	<b>1,996</b>



**Figure 6.4 - Core Policing Resourcing Requirement (FTE and Capital/One) - £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
Core Policing Resourcing Requirements	716	1,314	1,501	1,749	1,687	1,687	1,687	1,568	784	784	13,478
Capital/One Off Requirements	867	182	89	90	173	473	84	38	0	0	1,996
<b>Total</b>	<b>1,583</b>	<b>1,496</b>	<b>1,589</b>	<b>1,840</b>	<b>1,861</b>	<b>2,161</b>	<b>1,772</b>	<b>1,606</b>	<b>784</b>	<b>784</b>	<b>15,475</b>
<b>Resourcing FTE Requirements</b>	<b>11</b>	<b>21</b>	<b>24</b>	<b>28</b>	<b>27</b>	<b>27</b>	<b>27</b>	<b>23</b>	<b>10</b>	<b>10</b>	

**Appendix 2: Updated 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.

#### 2. HEADS OF TERMS

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

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: £2,511,000</p> <p>Year 1: £2,428,000</p> <p>Year 2: £2,735,000</p> <p>Year 3: £3,422,000</p> <p>Year 4: £3,775,000</p> <p>Year 5: £4,076,000</p> <p>Year 6: £3,639,000</p> <p>Year 7: £2,924,000</p> <p>Year 8: £1,608,000</p> <p>Year 9: £1,499,000.</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	<p>NWP must provide HNP with a report setting out:</p> <p>how the payments received to date have been spent; and</p> <p>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.</p>	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 Costs (the costs in relation to maintaining increased resource for the proposed period that development will</p>	-

	<p>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 comments applies throughout these Heads of Terms where a referral to this mechanism is mentioned.</i></p>	<p>Following the first payment and no more than once a year.</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> <li>• Nuclear site security plan; and</li> </ul>	



	<ul style="list-style-type: none"> <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>The relevant plans are:</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>

	<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 be appointed as one of the bodies responsible for</p>	-

	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	FTE	£k	FTE	£k	FTE	£k	FTE	£k	FTE	£k	FTE	£k	FTE	£k	FTE	£k	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	2	96	1	48	1	48
Road Policing Unit – RPU and Commercial Vehicle Unit	9	455	18	868	22	1,059	26	1,250	26	1,250	26	1,250	26	1,250	22	1,059	9	455	9	455
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	5	239	4	191	3	144	3	144	2	96	2	96	2	96	2	96	2	96	2	96
Overheads		351		508		603		762		815		815		815		603		308		283
Exit Costs		0		0		0		0		0		0		0		272		272		272
<b>Total Requirement</b>	<b>24</b>	<b>1,523</b>	<b>36</b>	<b>2,201</b>	<b>43</b>	<b>2,615</b>	<b>55</b>	<b>3,302</b>	<b>59</b>	<b>3,533</b>	<b>59</b>	<b>3,533</b>	<b>59</b>	<b>3,533</b>	<b>43</b>	<b>2,886</b>	<b>21</b>	<b>1,608</b>	<b>19</b>	<b>1,499</b>

### 3.2 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> (Based on three models currently used by NWP, a full breakdown is	285	184	110	101	199	224	95	0	0	0	1,237

Function	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Total
available in the Impact Assessment)											
<b>Equipment Costs</b> (ANPR cameras, average speed cameras and ProLaser)	642	0	0	0	0	300	0	0	0	0	942
<b>IT Infrastructure</b> (Laptops, desktops, tablets, airwave radios, mobiles etc)	62	43	11	18	42	18	11	0	0	0	204
<b>Total Costs £k</b>	<b>1671</b>	<b>227</b>	<b>121</b>	<b>119</b>	<b>241</b>	<b>542</b>	<b>105</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>3,065</b>