

**HORIZON**

NUCLEAR POWER



# Wylfa Newydd Project

## Horizon's Response to North Wales Police Examination Submissions

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# Contents

1	Horizon’s response to North Wales Police Examination Submissions .....	1
1.1	Introduction .....	1
1.2	Summary of engagement .....	1
1.3	Socio economic .....	2
1.4	Traffic and transport.....	4
1.5	The draft DCO .....	4

## Appendices

Appendix 1-1	Gore Appendices
Appendix 1-2	Steer Appendices

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# **1 Horizon's response to North Wales Police Examination Submissions**

## **1.1 Introduction**

1.1.1 Horizon Nuclear Power Wylfa Limited ("Horizon") has reviewed the report submitted by North Wales Police (NWP) at Deadline 4 (17 January 2019) [REP4-043], which included their:

- Written submission of oral case made at the Issue Specific Hearing on 7<sup>th</sup> January 2019 on socio economic matters;
- Written submission of oral case made at the Issue Specific Hearing on 8<sup>th</sup> January 2019 on traffic and transport matters;
- Written submission of oral case made at the Issue Specific Hearing on 9<sup>th</sup> January 2019 the draft Development Consent Order;
- Updated Section 106 Heads of Terms required by NWP.

1.1.2 These topics are summarised in a covering letter from Barton Wilmore dated 17<sup>th</sup> January 2019.

NWP's response at Deadline 4 (17 January 2019) follows the submission of a detailed Police Impact Assessment as part of the Deadline 2 and 3 submissions (4 December 2018 and 18 December 2018) [REP2-345 and REP3-020]. Horizon has been working with expert advisors to understand the implications of the analysis in NWP's analysis.

1.1.3 This document responds to the key issues raised within NWP's Deadline 4 (17 January 2019) submission by overarching topic areas with cross reference to Horizon's responses to the Examining Authorities Second Written Questions (where they are relevant to matters relating to NWP) and to the ongoing dialogue with NWP through the Statement of Common Ground (SoCG) Process.

However, given a number of the matters raised by NWP's Deadline 4 (17 January 2019) response are addressed through emerging modifications to control documents and a redrafted s106 agreement (which will be submitted at Deadlines 5 and 6 ((12 February 2019 and 19 February 2019) and subject to further review and comment by stakeholders) this document and attachments focus primarily on Horizon's responses to NWP's Police Impact Assessment and the ongoing dialogue between Horizon and NWP's respective traffic and transport advisors (Steer and Vectos).

## **1.2 Summary of engagement**

1.2.1 Horizon has engaged proactively with NWP to understand and seek to address its concerns throughout the pre-application process and following the submission of the DCO application.

1.2.2 This has included regular meetings on topics of interest to NWP. Details of this engagement are set out in the draft Statement of Common Ground ("SoCG") between Horizon and NWP submitted at Deadline 2 (4 December

2018) [REP2-053], which is being updated for submission as a final document at Deadline 6 (19 February 2019) in line with the examination timetable.

1.2.3 Most recently, Horizon have met with NWP on the following dates:

23<sup>rd</sup> January 2019 – Traffic and Transport meeting

24<sup>th</sup> January 2019 (am) – NWP Police Impact Assessments

24<sup>th</sup> January 2019 (pm) – the DCO, s106 and SoCG

31st January 2019 – s106 (conference call).

1.2.4 Horizon shared the amended Deadline 5 (12 February 2019) version of the draft Workforce Management Strategy with NWP on 1 February 2019 and the draft Deadline 5 (12 February 2019) version of the Wylfa Newydd Code of Construction Practice with NWP on 5 February 2019. Horizon also shared the latest emerging draft of the s106 Agreement on the 24<sup>th</sup> January 2019. This draft of the s.106 contains significant updates in relation to the obligations and quantum required to address any impacts on police resources. This draft has been submitted into the examination at Deadline 5 (12 February 2019).; a further version is due to be submitted at Deadline 6 (19 February 2019).

## 1.3 Socio economic

1.3.1 NWP's summary of the oral case at the ISH on 7<sup>th</sup> January 2019 makes reference to concerns with regard to the robustness of Horizon's socio-economic assessment, suggesting that it underestimates the potential impact on NWP.

1.3.2 Horizon's position is, as expressed in ES Chapter C1 [APP-088], that the potential increase in crime rate is a negligible impact of the Project with no significant effect. However, as set out in the response to NWP's Written Representations [REP3-020], socio-economic assessments are made on the basis of a number of assumptions about data accuracy and reliability. They relate to a simplified model of a complex reality. Predictions have been made on the basis of worst case scenarios using the best available information.

1.3.3 It is therefore Horizon's position that the conclusions of the ES remain robust, in that the assessment recognises that the Wylfa Newydd Project is likely to create demand on the NWP service. The proposed mitigation through the Emergency Services (Police) Contribution will be secured through the s106 agreement. The scale of this contribution is not, however, currently agreed between Horizon and NWP.

1.3.4 Horizon has appointed Gore Associates, who are experts in policing and public safety matters, to review NWP's Police Impact Assessment – which requested a total financial contribution of £29.3m to mitigate impacts on the police force. The Gore Associates findings are provided in detail at Appendix 1-1.

1.3.5 This concludes that the analysis undertaken by NWP, based on the relationship between population growth and incidents and crime rates, does not represent an accurate method of measuring the workload of policing. As a

result, the resource requirement promoted by NWP is disproportionate for an increase in population of 7,000 workers at peak.

- 1.3.6 The mitigation contribution therefore reflects the Gore Associates expert advice and the Emergency Service (Police) Contribution is set out in the s106 Agreement submitted at Deadline 5 (12 February 2019), as requested by the Further Written Questions. This contribution of £6,170,242 would be available to NWP to fund:
- neighbourhood policing capacity comprising 1 sergeant; 2 constables and 3 PCSOs;
  - road policing capacity comprising 2 constables;
  - operational planning capacity comprising 1 constable; and
  - detective/intelligence capacity comprising 1.25 detective constables.
- 1.3.7 This evidence base for this offer is set out in the report at Appendix 1-1.
- 1.3.8 NWP also note that it needs the ability to monitor the Project through construction to ensure that the impacts of the project have not changed [REP-043]. The use of contingency funds has been reduced across the s106 agreement and Horizon is not proposing a contingency fund for the emergency services. The Emergency Service (Police) Fund would be provided in annual instalments reflective of the stage of the construction works. Horizon also considers that the first payment (at implementation under the draft s.106 agreement) is sufficiently early in the development programme to allow for requisite training, being paid well before the workforce numbers begin to increase sharply.
- 1.3.9 Horizon have accommodated the NWP s.106 requests that:
- It is notified of commencement under the s106 agreement, alongside IACC;
  - The worker accommodation monitoring data from the Workforce Accommodation Management Service must also be shared with NWP.
  - IACC would have to consult NWP on funding applications from the Community Fund which may affect public safety.
- 1.3.10 In response to NWP's specific requests on the scope of its deed of covenant, Horizon notes that that relationship will now be direct as between NWP and IACC.
- 1.3.11 The NWP response also notes that NWP requires control over any plans which are relevant to community safety. As set out in the final SoCG (which will be submitted at Deadline 6 (19 February 2019)), both parties agree that it is appropriate for Horizon and NWP to work together to agree a set of principles for the production of the Community Safety Management Scheme (CSMS) which is secured by a DCO requirement, and progressed in collaboration with an 'Emergency Services Engagement Group (ESEG) constituted under the revised draft s106 Agreement. NWP confirmed at the meeting that NWP's requirements extended only to the ability to agree the

principles of its content rather than just be 'consulted', but that this would not extend to sign off powers or the ability to veto plans. The approach now included in the DCO and control document is set out in para 1.5.4 below.

- 1.3.12 The updated CSMS principles are included within a revised Wylfa Newydd CoCP (submitted at Deadline 5 (12 February 2019)). NWP will have a right to agree the detail of the CSMS under the Wylfa Newydd CoCP. This is addressed in further detail in Horizon's response to SWQ Q2.4.21.

## **1.4 Traffic and transport**

- 1.4.1 NWP's response in the "Transport and Highways response to EiP hearing" document prepared by Vectos on behalf of NWP is broadly broken down into the following topic areas:

- Robustness of the baseline traffic data;
- Consistency with the data adopted by National Grid for the North Wales Connection;
- The scope of the TA;
- The role and function of the WN CoCP and sub CoCPs;
- The siting of the Logistics Centre and Park and Ride;
- Control and monitoring of impacts;
- ANPR monitoring;
- Impact on the Britannia Bridge.

- 1.4.2 Horizon and NWP's respective consultants, Steer and Vectos, met on 23<sup>rd</sup> January to discuss the outstanding traffic and transport matters.

- 1.4.3 The note prepared by Steer at Appendix 1-2 presents a response to the issues raised in NWP's Deadline 4 (17 January 2019) submission.

## **1.5 The draft DCO**

- 1.5.1 NWP raised a concern in the Deadline 4 (17 January 2019) submission that all plans and strategies that may impact on its statutory functions are adequately secured and should be informed by NWP and the other emergency services. Appendix 2 of NWP's Deadline 4 (17 January 2019) response [REP4-043] sets out a schedule of plans and strategies requiring NWP involvement.

- 1.5.2 This matter was discussed in detail at the meeting between Horizon and NWP on 24<sup>th</sup> January 2019.

- 1.5.3 Horizon confirmed that the WNMPOP would not be progressed and consequently the proposed engagement groups would now be secured through the s106, a revised draft of which was issued to NWP on 24 Jan 2019. This would include the 'Emergency Services Engagement Group' (i.e. no longer a sub group) comprised of the blue light services and Welsh Government.



- 1.5.4 Horizon's response to the Examining Authorities SWQ Q2.4.21 provides a detailed response to the matters raised in NWP's Appendix 2 of REP4-043. In summary, this confirms that Horizon has provided NWP with consultation rights in respect of the CSMS, and other schemes which fall within their statutory function, including the Traffic Incident Management Scheme, AIL Management Scheme, Protest Management Scheme, Operational Travel Scheme and any revisions to the Workforce Management Strategy.
- 1.5.5 NWP also have the right to agree the detail of the CSMS under the Wylfa Newydd CoCP prior to the formal submission under DCO Requirement PW7.
- 1.5.6 Horizon also notes that Schedule 19 of the updated dDCO (Revision 4.0) has been updated at Deadline 5 (12 February 2019). to clarify that the discharging authority has the right to consult any statutory body it considers relevant in the discharge of approval under the DCO, irrespective of whether that consultee has been identified in the Requirement.

## **Appendix 1-1      Gore Appendices**



**Review of North Wales Police Impact Assessment**

**Mark Gore & Martin Stevens**

**Gore Associates**

# **1 Review of the North Wales Police Impact Assessment**

## **1.1 Purpose of this document**

- 1.1.1 This document has been prepared by Gore Associates in response to a request by Horizon Nuclear Power to conduct an independent review of the 'Assessment of the Impact on Police Demand' undertaken by North Wales Police in relation to the Wylfa Newydd Project. The review is evidence based but also combines professional opinion.

## **1.2 Background Gore Associates**

- 1.2.1 The review has been carried out by Gore Associates who are policing and public safety consultants.
- 1.2.2 Mark Gore has over 38 years' experience having served for over 30 years in the Metropolitan Police. Martin Stevens has over 40 years' experience, serving in with both the Sussex and Metropolitan Police. Both have worked nationally and internationally at senior levels and provide the main evidence contained in this report.
- 1.2.3 They have a wide range of experience of:
- Income generation contractual agreements made by way of Section 25 and section 92 Police Act 1996 (The supply of Police Services to third party and Local Authorities), including additional Safer Neighbourhood policing teams and Safer Transport teams deployed across London
  - Management of police resource both within the operational and support context.
  - Transformational change programmes, managing resource allocations in both operational and support roles across the police and wider criminal justice services.
  - Programme management for both public and private sector organisations
  - Identifying 'As Is' cost efficiency processes, identifying cost savings within the business processes for police and criminal justice services resulting in reduction in both capital and revenue costs.
  - Significant operational command experience and the management of critical incidents
  - Working globally with leading management consultants as subject matter experts in the fields of public safety and law enforcement.

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1.2.4 A further independent review and academic validation was conducted by Professor Betsy Stanko, OBE. She has a significant experience of policing:

- Formerly head of evidence and insight in the Mayor of London's Office for Policing and Crime. Worked inside the Mayor's Office and the London Metropolitan Police Service's Corporate Development, establishing a social research function alongside performance analysis for improving crime and justice in London.
- Professor of criminology, teaching and researching at Clark University (US), Brunel University, Cambridge University and Royal Holloway, University of London (where she is an emeritus professor of criminology). Visiting professor at UCL's Department of Crime Science and Security and City University London's Sociology Department.
- From 1997–2002 she was director of the ESRC Violence Research Programme. In 2002, she joined government from academia in the Prime Minister's Office of Public Services Reform.
- Awarded an OBE in 2014 for her services to policing.

### **1.3 Demand for policing services**

1.3.1 In response to the development at Wylfa Newydd, North Wales Police have conducted an impact assessment and issued a request for almost £29.3 million for the ten-year period of the development to mitigate against the increased demand. To conduct this assessment North Wales Police have adopted a crime and incident model based upon an increased population of 7,000 workers in the KSA at the peak of construction.

1.3.2 Having reviewed the methodology and rationale used by North Wales Police to calculate the resource requirements it is our position, based on a detailed assessment, that the approach taken by North Wales Police is fundamentally flawed and not an appropriate model to accurately determine the additional demand.

#### ***Methodology and resource formula used by North Wales Police***

1.3.3 North Wales Police have created a formula using two models, which they refer to as the crime and incident models. The methodology underpinning both formulas is to compare crime and incident data against resident population at ward level across all force areas in Wales. Adopting this method, they have estimated that crime will increase by 7.8% and incidents by 6.1% all due to the additional 7,000 construction workers.

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- 1.3.4 By adopting this methodology in Year 1 and Year 2, when there are less than 500 construction workers on site North Wales Police have requested an additional 24 posts in Year 1 and 36 posts in Year 2 to deal with this demand. In our professional opinion this is disproportionate and inflated, taking into account the demand 500 workers would place on local police services.
- 1.3.5 This methodology of using data from every ward in Wales does not focus on the areas within the KSA. The approach captures data from wards in the more densely populated areas in the cities, which will disproportionately impact on the results from the formula and not accurately determine the impact within the KSA.
- 1.3.6 In addition, the formula takes no account of the annual growth in population within Wales, which has been on the upward trend on a year on year basis for the last decade. No attempt has been made to factor future growth predictions from this upward trend into any part of the formula's calculations. This means that even if the formula was the correct method of predicting increases to crime and incidents, the methodology underpinning its use did not at any stage include the predicted population growth in addition to that of the Horizon workforce.
- 1.3.7 Considering the population of Wales in the last eight years, the percentage of growth is slow but consistent. The percentage growth ranges from 0.32% to 0.96% adding around 10,000 to 30,000 people to the population every year. (UK population.org)

Population Growth in Wales:

Year	Total	Growth
2014	3,120,000	
2015	3,150,000	30,000
2016	3,160,000	10,000
2017	3,170,000	10,000
2018	3,187,203	17,203

### ***Transient Population***

- 1.3.8 North Wales have also not taken account of the transient population coming through the area, that creates an additional demand on core policing services. These include:
- Approximately 1.8 million Passenger journeys made by people travelling into Anglesey through the Holyhead Ferry port.

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- Approximately 400,000 Lorries and trailers pass through the ferry port with over one million tonnes of cargo load annually.
- Approximately 650,000 visitors to Snowdonia National Park entering the eastern area of Gwynedd.
- Approximately 1.5 million tourists together with a year-by-year increase in Passenger Cruise liners visiting the island.
- 16,605 students from both Bangor Universities (most of which maintain their home addresses as their place of residence and therefore not accounted for within the resident population count.)

### ***Crime Data***

- 1.3.9 The transient population amounts to an approximate total of over 3.9 million people that have not been included in the North Wales Police resource calculations.
- 1.3.10 In order to take account of any possible double counting within that total whereby passengers may well be tourists etc., and considering the calculations are based on a 7,000-workforce population at peak: If we were to calculate 7,000 different people entering Anglesey and North Gwynedd each day of the year, the total will be 2.55 million individuals.
- 1.3.11 This vast number of people currently places an unmeasured demand on policing services for which No account has been taken by North Wales Police at any point within their Assessment of Impact report and final calculations.
- 1.3.12 To use recorded crime as a method of predicting future demand is not an accurate method of assessment as it only represents part of the police workload. It indicates a reactive demand but does not fully capture the types of work police are engaged in and undertake. The College of Policing Demand Analysis supports this position and states that different crime types require varying levels of resources depending on the complexity of the crime.
- 1.3.13 In 2016/17 North Wales Police dealt with 407,178 calls of which 204,619 were calls for assistance. (nearly half did not require a resource.) The force recorded 40,871 crimes for the same period, a reduction of 3.5% in crime per 1,000 head of population since 2010/11. The force has the second-lowest risk of household crime nationally.

### ***Crime Rates***

- 1.3.14 North Wales Police have used as a methodology the numbers of total recorded crime and incidents as part of their formula. As a result, the formula includes within its calculations, groups that do not match the demographic profile of the Horizon workforce. The following should not have been included in the calculations:

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- Crimes committed by non-residents (transient population)
- Crimes committed by Juveniles (Across North Wales all local authority areas have seen a reduction in the number of young offenders except for Anglesey).
- Crimes committed by the 65+ age group
- Crimes committed by Females
- Crimes committed by repeat or prolific offenders
- Crimes committed by those currently unemployed

1.3.15 The methodology used to support the formula does not take account of the large percentage of crimes screened out by the force as a method of reducing police attendance and demand. All crimes reported are assessed, but if there is not a realistic prospect of identifying or apprehending the offender it will be screened out and no further investigation conducted. We are awaiting further data from North Wales Police and it is anticipated that this should be provided within two weeks, following which this report will be updated.

1.3.16 The methodology used to support the formula does not take account of the non-emergency calls for assistance from both areas instead it uses data from the total of 999 calls to every force in UK (except Metropolitan Police) and calculates those totals against resident populations to achieve an average. We are awaiting further data from North Wales Police and it is anticipated that this should be provided within two weeks, following which this report will be updated.

1.3.17 The formulas used by North Wales Police for calculating impact do not take account of any of the following facts that would have resulted in a vastly different outcome of predicted demand:

- Both the Isle of Anglesey and Gwynedd North have a larger percentage of females to males counted within the resident population. (2017 figures show Isle of Anglesey as male: 34,361 and female: 35,433 and Gwynedd as male: 61,335 and female: 62,407)
- The Isle of Anglesey has a resident population of 13,429 children and young persons aged 0 to 17. with Gwynedd having 23,410 in the same age bracket
- The population on Isle of Anglesey of those aged 65+ is 17,812 and for Gwynedd 27,971.

These groups are not representative and do not match the demographic profile of the total construction work force that will be employed throughout the development.



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### **Arrests.**

#### **Breakdown of arrests**

The figures below were provided as a response to a Freedom of Information request and we do not believe they are correct. We have asked for further data from North Wales Police and it is anticipated that this should be provided within two weeks, following which this report will be updated.

Year	Number of arrests	In Gwynedd North/ Anglesey	Juvenile	60+	Charged
2016	3462	650	155	137	2386
2017	3528	692	211	77	1900
2018	2538	397	96	82	1316

#### **Victim groups**

- 1.3.18 In 2018 North Wales Police dealt with 9,623 reported crimes of which 7,442 gave their address as within the two areas in question.
- 1.3.19 This resulted in 7442 victims of crime per 132,000 head of population within both the Isle of Anglesey and North Gwynedd. This total calculates to an annual victimisation rate of 394 for a 7,000-population increase. The result being that the Horizon workforce have a far greater chance of becoming a victim of crime than being an offender.

#### **Causes of crime**

- 1.3.20 In trying to establish potential demand its necessary to consider what are the key causes of crime and how this would correlate to the Horizon workforce. Academic research shows that they key causes of crime are:
- Poverty – economic deprivation
  - Drugs and/or alcohol abuse
  - Unemployment
  - Family conditions
  - Job availability
  - Age of population

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- 1.3.21 There are several research papers that find that rising unemployment causes an increase in crime and that reducing poverty and stabilising incomes reduce crime rates.
- 1.3.22 There is clear evidence that there is a correlation between unemployment and crime with joblessness being a major motivator in theft, burglary and violent crimes that can have a monetary motivation. In addition, statistics on offenders show that 51% of offenders claimed out of work benefits in the month before their sentence.
- 1.3.23 As of February 2014, 12.5% of the working age population in Anglesey were claiming out of work benefits. The statistics on offenders suggests that this cohort has a substantially higher propensity to commit crime, a cohort that will not be present in the new workforce.
- 1.3.24 The proportion of people aged 16-64 who are not in employment in Anglesey stands at 28%. This includes both the unemployed and the economically inactive population such as students, early retirees and the long-term sick. (Land and Lakes paper)
- 1.3.25 The nuclear new build workforce will all be economically active. This massively reduces their propensity to commit crime.
- 1.3.26 The new workforce is expected to be higher skilled than the Anglesey population and therefore have a lower propensity to commit crime.
- 1.3.27 The age profile of the nuclear new build has a low proportion of the younger age cohorts who have a high propensity to commit crime.
- 1.3.28 The visiting workers will all be housed in a secure setting, reducing the extent to which they will be targeted for theft/burglary.
- 1.3.29 The Horizon workforce will in the main not fit into any of these categories, thus greatly reducing the chances of being involved in crime or placing any demand on North Wales Police.
- 1.3.30 In using the crime rates for Anglesey and North Gwynedd, North Wales Police have failed to capture the true characteristics of the new workforce and their propensity to commit crime. As a result, it is almost certainly the case that they have overstated the policing costs associated with the new visiting workforce
- 1.3.31 There is clear evidence that there is a correlation between unemployment and crime with joblessness being a major motivator in theft, burglary and violent crimes that can have a monetary motivation.

### ***Crime Prevention***

- 1.3.32 The North Wales Police assessment of impact and formulas do not at any stage fully consider the crime reduction initiatives that Horizon are intending to put in place to mitigate risks which will impact on the predicted increase in service demand. These include:

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- Horizon workers contracts will include dismissal for those arrested and convicted of criminal offences, which by itself should act as an effective deterrent.
- Random drink and drug testing will be carried out on site
- The availability of safe and secure areas for contractor's equipment out of working hours
- Physical security measures compliant with secured by design specifications. *'The principles of the scheme have been proven to reduce the risk of crime and the fear of crime' (Secured by Design Website)*
- 24-hour site security, CCTV and Security patrols
- Additional security measures secure storage, enhanced lighting, CCTV, locking points to immobilise plant as well as heavy-duty barriers and gates.
- Horizon Police liaison personnel
- Information sharing protocols with criminal record checks being undertaken on all staff and contractors at point of employment. The checks will be BPSS for nearly all workers which includes: Identity checks, ID confirmation, right to work check, employment checks over last 3 years and unspent Criminality checks via Basic Disclosure. All of these when put in place would have a significant impact on reducing the potential demand on North Wales Police and none of them have been considered as part of the calculation.

### **Academic assessment of formula**

- 1.3.33 Professor Betsy Stanko, OBE, was asked to evaluate the resourcing models adopted by North Wales Police. In her view the impact assessment demonstrated a very static, 'old-school' view of policing.
- 1.3.34 She stated that the model does not consider any recognition of whether the Isle of Anglesey represents an outlier in terms of 'hot spot for crime'. Strong academic evidence suggests that 'hot spot policing' has reduced crime.<sup>1</sup> North Wales Police have used a generic sweep assumption that more police officers will be needed to respond to an increase in demand without demonstrating a more evidenced understanding of exactly when and where this demand might arise. There is no offered evidence on what might contribute to this demand (except for an increase in population and presumptions that working men will increase issues in the night time economy).
- 1.3.35 There was no presentation of evidence by North Wales Police of the use of proactive crime prevention and problem solving policing
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initiatives, including the use of speed cameras<sup>2</sup> or other technology such as ANPR or CCTV which might be especially useful on the Isle of Anglesey (these may already being used but this was not specified in the submission) as a tactic in managing the prevention of problems.

- 1.3.36 In conclusion she felt that the submission by North Wales Police was curious in its approach to calculate the need for police resources with sole regard to crime and incident demand. She could see no support for the formula for a blanket calculation for resources based on a simple mapping of crime/incidence against population.

### ***Comparative Studies***

- 1.3.37 It is always useful to look for benchmarking cases and the only relevant example within this industry is Hinkley Point. Although the Horizon development is larger in terms of scale and workforce (5600 workers at peak), North Wales Police appear to have adopted a similar approach when looking at demand. At Hinkley Point over £3 million was provided to resource a community safety beat team and a marked police vehicle. North Wales Police have indicated that there are some issues relating to the policing of Hinkley Point but have not made available any details. Taking this into account there is a significant difference between a resourcing request of £3 million compared to £29 million, notwithstanding the difference in the scale and workforce.
- 1.3.38 Crossrail is Europe's largest infrastructure project providing a high capacity railway for London and the South East. It involves 118km of track; 42km of tunnels and at the peak of construction 14,000 people were employed. Despite the significant impact this project had on the roadwork the only police resource funded through the project at the construction stage was one constable, employed as a liaison officer.
- 1.3.39 There are other examples where organisations have funded policing services, outside of core duties, under section 25 Police Act 1996. Westfield Shopping Centre in London have purchased an additional team consisting of one sergeant and five constables. The team provided a dedicated presence within the shopping centre, integrating into existing policing services. The centre is the largest shopping mall in Europe, employing over 7,000 people and dealing annually with 7.8 million shoppers.

### ***Section 106 applications***

- 1.3.40 There are a several developments that have been proposed within the North Wales Police area, which have included:
- £14million Bangor regeneration plans
  - £14 million construction work at Gwynedd A & E department

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- £135 million Caernarfon Bypass (planning obtained through Welsh Government)
- £12.7 million new Bangor primary school
- £56 million Welsh flood defence schemes
- £105 million Bluestone Resort
- £120 million Anglesey Holiday Village
- Multi-million-pound Anglesey Tidal Project (consent obtained but project currently suspended)
- £95 million Deeside development

- 1.1.41 It is likely that all these developments could have had an impact on the policing services in the area, but we have been informed by North Wales police as a result of a Freedom of Information request, that no other Section 106 applications have been made for any other construction work except that of the Horizon build.

### ***Example of Alternative Demand Model***

## **1.4 Rationale**

- 1.4.1 In response to the North Wales Police 'Assessment of Impact on Police Demand' and the identified discrepancies in the formula created and used to calculate their projected resource requirements, an alternative model has been developed. This should better reflect the resources required by North Wales Police to deal with the projected increase in demand for services, caused by the proposed Wylfa-Newydd Nuclear Power Station development and the increase to the local population.
- 1.4.2 The proposed alternative formula is far more realistic in its approach and has been developed with a key focus on preventing and reducing demand for police services rather than one that accepts that demand will increase as a probable consequence of an increase in resident population to the area.
- 1.4.3 The restrictions placed on the police service by way of Police Act 2006 makes it legally binding for funding requests to exclude the current policing resource dedicated to core policing duties before any calculations of growth in resource can be considered. A resource allocation formula has been developed that is reasonable, flexible, rational and one that more accurately assesses the impact of demand outside that of existing core policing operations.
- 1.4.4 In order to create a formula without too many variables, such as numbers of transient populations, which is in the main based on estimated numbers, the following calculations have been adjusted to take account of the recorded resident population of both areas only in

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a similar way to that of the formula used by North Wales Police in their Impact assessment

- 1.4.5 We are awaiting further data from North Wales Police and it is anticipated that this should be provided within two weeks, following which this report will be updated.

### ***Local Policing Services***

- 1.4.6 The delivery of local policing by way of a Safer Neighbourhood Team is one of the key priorities of the North Wales Police service, delivering a visible, accessible and familiar policing service to an additional 7,000 workforce population at peak will require some adjustment to their current structures.

- 1.4.7 An example of a resourcing model based on their current deployment of police resource for Anglesey would be as follows:

- One inspector
- One sergeant
- 18 police community support officers (PCSO)

The sergeant forms part of the supervision model and will be subject of a separate calculation. This means that 18 PCSOs are policing a resident population of 130,000, which calculates to a ratio of one PCSO for every 7,200 residents. Therefore, an increase in population of 7,000 would require an increase of one PCSO.

### ***Custody***

- 1.4.8 An example can be calculated by using data supplied within the North Wales Police Impact assessment document. It should be noted that the deployment of sergeants rather than constables within the post is a legislative requirement.

- 1.4.9 The level of resource dedicated to the Caernarfon Custody Block to deal with the Core Policing is 10 Custody sergeants and 7 Custody Detention Officers. The custody block currently runs at an average occupancy of 34.5% with a total of 2538 detentions (not all from the areas in question) in the year 2018.

- 1.4.10 The resource has capacity to move to a maximum level of occupancy, which would be such a high total, nearly three times the amount, that it would far outweigh the complete population from the construction works. Therefore, common sense would suggest that there would be no increase in resource required.

### ***Operational Planning***

- 1.4.11 Within the operational planning department no resource formula has been undertaken to support their request for two additional posts and there appears to be an expectation by that department that two further staff dedicated to the project are required to meet the needs of the service. At present we believe that there is a dedicated planning

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resource dealing with the on-going work of Magnox, which could naturally transfer to Horizon.

- 1.4.12 No information is contained in the report as to the current staffing levels that North Wales Police have dedicated to dealing with core policing activities. There are twenty-three areas of responsibility covering the whole of North Wales, one of which is defined as Nuclear. There are of course other areas of responsibility such as public order and chemical, biological, radiological and nuclear defence. It should be borne in mind that North Wales Police only have responsibility for off site emergency arrangements, they have no say on any on site emergency arrangements.
- 1.4.13 These responsibilities may well overlap if protests were to occur as a result of the build. It is therefore an assumption that the three areas of departmental work relevant to this bid is only a very small percentage of the total workload within that department.
- 1.4.14 From the available information it is difficult to establish a clear business case necessitating an increase of two posts. Further evidence is required to establish the resource levels as there are staff already deployed as part of the core policing functions.

### ***Force communication centre***

- 1.4.15 Within the North Wales Police impact assessment for the Force Communications Centre the resource allocation model is based on data for total 999 calls for all police force areas in England & Wales (and not localised to Anglesey and North Gwynedd) and calculates those numbers against the current resident population. The formula assumes demand across all force areas to be equal against their respective populations and takes no account of social-economic factors effecting the demand.
- 1.4.16 The formula takes no account of the 101 non-emergency calls or the calls generated by the vast transient population of the area. It makes no attempt to narrow down call demand generated within the Isle of Anglesey and Gwyneth North local authority areas.
- 1.4.17 An example of the formula that should be used is to calculate the total number of calls received from within the Isle of Anglesey and Gwyneth North local authority areas and divide them by the number of staff currently deployed within the control room giving the average calls dealt with per person. Next divide total calls by total population, which will give average calls per person. Multiply this number by 7,000 and this will give the total calls generated by the increase. Divide that by the number each staff member deals with over the year and it will result in number of posts required to meet the extra resource.
- 1.4.18 An example of the formula would be as follows:  
  
24 staff deployed in a 24-hour control room receive 35,0000 calls a year from the designated area. This equates to 1,458 calls per controller to deal with the core policing demand. Then divide 35,000

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by 130,000 population, which gives an average of 0.26 calls per resident. Multiply this by 7000, which results in 1,815 calls, which requires an increase of resource of 1.25 posts.

### ***Crime service***

- 1.4.19 This area of workforce has been split into four areas of responsibility as follows: Managed Response Unit, Investigation Support Unit, Crime Services and Administration of Justice all of which are a force wide resource.
- 1.4.20 The resource formula used by North Wales Police, within their impact assessment, calculates growth in demand across the whole of North Wales, which is calculated against a 1% increase in total population. This takes no account of demand generated by several million people who make up the transient population of the areas.
- 1.4.21 The suggested formula for the departments could be calculated separately and on the following basis:
- The current number of posts deployed in each of the departments divided into the current caseload, which is generated within the two local authority areas concerned. This will produce the number of cases dealt with per post relevant to the area in question.
  - This number should be divided by the number of resident populations from the area concerned which will give you the number of cases per head of population. Multiply this by the predicted increase of 7,000 and calculate the total against caseload to calculate any resource requirement. This formula again takes No account of the transient population and is therefore more favourable to North Wales Police.

### ***In life management: programme management & support***

- 1.4.22 North Wales Police have not conducted any calculations to estimate the numbers of staff being requested and no information is available on the department's current resources and workloads.

### ***Training***

- 1.4.23 The current calculations for training staff are based on an increase in police resources generated by the impact assessment calculations but does not use any formula.
- 1.4.24 The suggested formula is for current number of training posts that North Wales Police have dedicated to training their workforce of police officers, community support officers and civilian support staff to a standard required to deliver core policing services to be divided into the number of total staff to establish how many each post is responsible for training. Then calculate the total staff required against the agreed increase of resource. At the peak demand they have requested five additional posts and it would be unlikely that any calculation adopting this approach would justify that total.



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### ***Overheads and charging costs***

- 1.4.25 This is an area in which the costing is set out in National Police Guidelines on charging for Police Services. The funding levels are set out under cost categories:
- Employable Costs: This represents the basic actual cost of the service providers, including on costs but with no allowance for the recovery of overheads.
  - Direct Costs: This is the cost of an officer including a standard overtime recovery element
  - Operational Resource Cost: This represents the cost of the resource employed in the provision of service; here the direct costs and the direct overheads are included.
  - Full Economic Cost: This calculation includes all property attributable cost
- 1.4.26 It is suggested that all costs are calculated using the full cost recovery model, which incorporates contributions to all support costs.

### ***Roads Policing Unit***

- 1.4.27 On the information provided by North Wales Police it is not possible at the present time to fully consider the impact assessment or consider an alternative model.
- 1.4.28 The assessment undertaken by North Wales Police does however state that they would need an increase in establishment to effectively police the roads on the Isle of Anglesey, the surrounding areas of Gwynedd local authority and the A55 corridor. At the peak they have requested an additional 26 officers, which based upon all current information appears to be excessive when compared to the current strength of the units.
- 1.4.29 As part of the rationale supporting the increase in resources, they have linked this to the increased number of abnormal loads. The duty to escort abnormal loads is not a core function or legislative duty of the police. Routine escorting of abnormal loads is now not carried out by most police forces and they are, subject to authorisation, escorted privately. If the police are required to escort an abnormal load, then a set charge will be applied.
- 1.4.30 North Wales Police informed us that they had agreed with the Welsh Government to be responsible for the escorting of all abnormal loads but were unable to provide details when requested. It was however subsequently discovered that between April 2017 – April 2018 they were a total of 92,031 notifications and 12 AIL police escorts had been undertaken. North Wales Police have also stated that they would only escort two abnormal loads per day, despite requesting an additional 26 officers at peak.

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- 1.4.31 When carrying out the assessment North Wales Police did not take full regard of all the mitigating factors that Horizon had put in place to reduce the movement and volume of construction traffic on the existing road network. Horizon has also offered to pay for all abnormal loads that need to be escorted by the police.
- 1.4.32 The Marine Offload Facility, which, is scheduled to be completed at the beginning of year three, will significantly reduce the number of abnormal loads using the local road network. In the first two years of construction the workforce will be below 500 and the number of abnormal loads will be minimal which raises doubt when considering the amount of roads policing officers requested.
- 1.4.33 The DCO has stated that 60% of all loads will be handled through the MOLF rather than the road network, based on the Environmental Impact assessment that has been carried out. In practice the target is for 80% of loads to be transported through the MOLF with the majority of AILs using the MOLF'.
- 1.4.34 Daily almost 1,200 heavy goods vehicles use the A55 to access Holyhead Port, which is currently managed using existing 'Core policing' resource. Horizon have set a limit of 160 heavy goods vehicle movements per day. through the DCO based on the Environmental assessment and traffic modelling. It should also be borne in mind that the port traffic is only an element of the heavy goods vehicle traffic and does not include general supply traffic to Anglesey or local farm/haulage movements.
- 1.4.35 Other measures have been put in place by Horizon that will limit
- 1.4.36 on the A5025 pre-opening of the A5025 Off-Line Highway Improvements to that assessed in the ES:
- 2,500 per month per direction
  - 160 per day per direction
  - 22 per hour per direction
  - Commitment to limit HGV movements on the A5205 post-opening of the A5025 Off-Line Highway Improvements to that assessed in the ES:
  - 3,500 per month per direction
  - 60 per day per direction
  - 40 per hour per direction
- 1.4.37 Nationally the number of officers employed on roads policing duty had reduced by 25% and we are still awaiting confirmation of the resource levels in North Wales Police to see whether this was the same in the force area. They currently have 56 officers on the roads policing unit and the increase in staff of 26 officers, almost half of their total current

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strength, seems out of proportion to cope with the population increase and construction traffic on the roads.

### ***Summary of Alternative Demand Model***

- 1.4.38 If the alternative demand model was applied, based on the current available data, the additional resources required to police the additional demand created through the development would be:

▪ Local Policing	1 PCSO	
▪ Custody	Nil Growth	
▪ Operational & Emergency Planning	Nil Growth	
▪ Force Communication Centre (estimated)	1.25	Posts
▪ Crime Services	Nil Growth	

- 1.4.39 The above calculations have been based upon estimated data and we are still awaiting full data from North Wales Police when a more accurate assessment could be made

### ***Moderated Resource Model***

#### ***Proposed model of policing for Wylfa Newydd development***

- 1.4.40 There is no doubt that the development of Wylfa Newydd Nuclear Power Station will have an impact on policing in North Wales and the communities on the Isle of Anglesey and Gwynedd North but the challenge is determining the impact and an appropriate resourcing model to mitigate this demand. As outlined earlier to adopt a purely linear model, that only takes account population and incidents, is not an appropriate model as it does not consider the way crime is committed and nor does it take account for new ways of working in policing.
- 1.4.41 Communities are diverse and complex and require a more sophisticated approach and the link between communities and the police continue to form the bedrock of policing. The most appropriate resource model to mitigate any demand build upon the Safer Neighbourhoods Teams adopted by North Wales Police with a hybrid approach allowing connectivity with other specialist policing services.
- 1.4.42 The impact assessment conducted by North Wales Police relies on a linear model mapping crime and incident demand to population. The context of the approach is also reactive rather than preventative not considering the broader community on the Isle of Anglesey, where most of the workforce will live and work.

### **Safer Neighbourhood Team**

- 1.4.43 The Safer Neighbourhoods Model is a well-established and effective community-based policing model that has been the subject of academic validation and forms the basis of the neighbourhood-policing model adopted in most forces. North Wales Police has ten Safer Neighbourhood teams dedicated to improving the quality of life within local communities by working with partners to tackle the issues that matter the most to local people. North Wales Police state that: “Neighbourhood Policing is our approach to fighting crime, addressing community safety issues, tackling anti-social behaviour and reassuring our communities.”
- 1.4.44 Safer Neighbourhood teams adopt a preventative approach to policing and are a dedicated resource that provides a visible and accessible presence within a defined area. Through their knowledge and understanding of an area they have the capability to develop a deep understanding of risk and reduce it. This type of team are also able to identify and respond to potential safeguarding issues, providing connectivity to other specialist policing services. They would also build up the links between the various ‘communities’, including workers, Horizon and the existing community within the area. There is also academic evidence to suggest that these types of teams, increase community confidence, reduce crime and reduce demand on other statutory partners. Adopting this holistic approach will also compliment the role of Community Involvement Officers, employed by Horizon and IACC to conduct outreach work with the community.
- 1.4.45 Community safety relates to a people’s sense of personal security and their feelings of safety in relation to where they live, work and spend their leisure time. Feeling safe influences how people value their community and is important to people’s quality of life. It is fair to say that there is an equal responsibility to achieve this state of safety for both the existing resident population as much as it is for the temporary Horizon workforce.
- 1.4.46 In the recent guidelines on Neighbourhood Policing recently published by the College of Policing they defined the features of neighbourhood policing:
- Police officers, staff and volunteers accessible to, responsible for and accountable to communities
  - Community engagement that builds trust and develops a sophisticated understanding of community needs
  - Collaborative problem-solving with communities supported by integrated working with private, public and voluntary sectors
- 1.4.47 It is proposed that the most effective response to manage the potential impact of 7,000 workers into the existing communities is to enhance the existing neighbourhood-policing model operated by North Wales Police. The teams need to be integrated into the existing model of

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policing coming under control of the sector inspector. To provide the capability the best model to deal with the increased demand created by 7,000 workers, at the peak build, is:

- One sergeant
- Two constables
- Three Police Community Support Officers

There is evidence available that confirms that a team of this size and composition can adequately deal with a community of this size.

The table below shows the total number of resources and how they develop over the construction of Wylfa Newydd against the increase in workforce.

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
Total Workers	500	500	2000	5000	6000	7500	9000	8500	6200	2500
Sergeant	1	1	1	1	1	1	1	1	1	1
Constables	1	1	1	2	2	2	2	2	2	1
PCSOs	1	1	2	3	3	3	3	3	3	2
Operational Planning	1	1	1	1	1	1	1	1	1	1
Detective/ Intel	1	1	1.25	1.25	1.25	1.25	1.25	1.25	1.25	1.25
Roads Policing	0	0	2	2	2	2	2	2	2	2
Total	5	5	8.25	10.25	10.25	10.25	10.25	10.25	10.25	8.25

- 1.4.48 The team need to be based locally to be visible and effective and the intention is that Horizon will make available suitable accommodation for the team within the development. In the impact assessment conducted by North Wales Police they have under capital requirements requested a new police station in Amlwch. It is strongly

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felt that this would not be suitable as experience and evidence dictates that Safer Neighbourhood Teams need to be located within their designated area to provide the connectivity.

- 1.4.49 The table below provides the breakdown of costs for the policing resources under this model across the lifespan of the development. The costs are based upon full cost recovery, which incorporates the overhead charges. The overall cost of the resources amounts to £6,170,242.

	Year1	Year2	Year3	Year4	Year5	Year6	Year7	Year8	Year9	Year10
Total Workers	500	500	2000	5000	6000	7500	9000	8500	6200	2500
<b>Police Team</b>										
Sergeant	£4,454	£4,454	£4,454	£4,454	£4,454	£4,454	£4,454	£4,454	£4,454	£4,454
Constables	£3,101	£3,101	£3,101	£46,202	£46,202	£46,202	£46,202	£46,202	£46,202	£3,101
PCSO	£5,427	£5,427	£14,854	£72,281	£72,281	£72,281	£72,281	£72,281	£72,281	£14,854
Operational Planning	£3,101	£3,101	£3,101	£3,101	£3,101	£3,101	£3,101	£3,101	£3,101	£3,101
Detective/Intel	£3,101	£3,101	£1,376	£1,376	£1,376	£1,376	£1,376	£1,376	£1,376	£1,376
Roads Policing			£46,202	£46,202	£46,202	£46,202	£46,202	£46,202	£46,202	£46,202
<b>Total Cost</b>	<b>£61,184</b>	<b>£61,184</b>	<b>£83,088</b>	<b>£13,616</b>	<b>£13,616</b>	<b>£13,616</b>	<b>£13,616</b>	<b>£13,616</b>	<b>£13,616</b>	<b>£83,088</b>

10 year total: £6,170,242

### Academic review of the moderated resources solution

- 1.4.50 As part of this process [Gore] engaged Professor Betsy Stanko, OBE, to independently validate the proposed resourcing model adopting a Safer Neighbourhoods approach.
- 1.4.51 In her opinion the Safer Neighbourhood approach is already well established according to North Wales Police own website. The police service provides the names of local officers and invites the public to contact them concerning local problems. As the evaluations of Safer Neighbourhood approaches in London and nationally demonstrates, this approach leads to higher levels of public confidence. The resource model used to calculate the number of officers and PCSOs working in a local area have also been tested over time. Assigning such a team directly to the build site, and the workers, is a bonus for the existing Safer Neighbourhood team currently covering the Isle of Anglesey. This would allow both teams to draw upon the local expertise and knowledge, which would be built up over time. These teams would adopt a problem-solving approach, which is recognised by the 'What Works in Crime Prevention' College of Policing as having a positive impact on crime prevention.
- 1.4.52 The Safer Neighbourhood approach allows the team to develop an enhanced local knowledge, particularly on safeguarding and sexual exploitation, which will allow them to identify any notable changes in the local environment. The North Wales Police assessment reads like a passive document waiting for newcomers to cause problems. North Wales Police have time to plan and to build scenarios and key

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indicators for monitoring whether and how that change has impacted local communities or on the trafficking of women for sexual exploitation. The knowledge of this change is very much engrained within the communities and they can identify this at an early stage and pass this information onto the local dedicated policing team. This makes it even more important that planning in advance can anticipate issues. anticipate issues. The traditional approach of the threats and risks outlined by North Wales Police lack up to date knowledge about the benefits of pro-active and community embedded policing.

- 1.4.53 The proposal for an onsite office for policing, within the development, should provide a central location for police advice, without having to invest in a new station that might have to be closed following the build.
- 1.4.54 Problem solving policing is the most robust approach to proactive, crime prevention and public safety. Police should also be proactive in identifying whether issues around the exploitation of local young women or women moving to the area to provide sexual services for the purposes of early intervention. These can be problem solved, but only if good relations are built between the workers, the community, and the police, something the Safer Neighbourhood team would have the best opportunity to do.

### **Detective Capability**

- 1.4.55 In addition to the Safer Neighbourhood Team it is also recognised that there is a need to increase the detective capacity to deal with a potential increase in intelligence, investigation, and safe guarding issues generated through the community team and the development of Wylfa Newydd. It should be borne in mind that some of the demand can be dealt with by the Safer Neighbourhood Team, but more serious issues will be dealt with by a detective. To cope with this, it is recommended an increase of 1.25 detectives; this will also cater for the increased demand generated by traffic using the new MOLF.
- 1.4.56 **Operational Planning**
- 1.4.57 In the impact assessment conducted by North Wales Police they requested two additional members of staff to deal with the increased demand placed on them due to the development. Whilst it is recognised there will be some additional work it is strongly believed that one post could deal with the demand without being at the detriment of North Wales Police or the public.

### **Conclusion**

- 1.4.58 The impact assessment conducted by North Wales Police adopted a linear model based upon population growth determining how this would increase both incidents and crime rates. This approach, utilising data across Wales and not data just within the KSA, is not an accurate method of measuring impact. Incidents and crime rates are not an accurate method of capturing the workload of policing. As a result of

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adopting this model the resource requirement is disproportionate for an increase in population of 7,000 workers

- 1.4.59 The new workforce is employed under strict contract clauses and should have a reduced propensity to commit crime and have a higher likelihood of being a victim of crime.
- 1.4.60 Whilst we have considered an alternative model based on the available data the most appropriate model is to develop a specific dedicated policing team adopting a more holistic approach. This will integrate into the local policing structures and have enough resources to make a difference to the safety and wellbeing to the residents and workers within the area.



## **Appendix 1-2      Steer Appendices**

To North Wales Police

Memo

Cc

From Steer on behalf of Horizon

Date 28 Jan 2019

Project Wylfa Newydd

Project No. 23056007

## Response to NWP DL4 Submission

### Introduction

This document aims to provide a response to the issues raised within the “Transport and Highways response to EIP hearing” document produced by Vectos on behalf of North Wales Police (NWP), dated 17 January 2019, received 23 January 2019.

Each item included in the “Transport and Highways response to EIP hearing” document is repeated below with an initial response provided by Horizon below each point in turn in blue text.

### Comments and Responses

#### Comment 1

Whilst the scope of the TA and its various components may have been agreed by Isle of Anglesey County Council (IACC) and Welsh Government (WG) some time ago, that does not mean that using 2014 Manual Classified Count (MCC) data is now the correct basis on which to assess the effect of the proposals in 2019. It is fundamental to the various assumptions and traffic modelling relied upon to gauge the effect of this nuclear Power Station, that correct and up to date base traffic data is used rather than traffic data which is five years old (2014). NWP appreciates that the project started a long time ago but given the scale and magnitude of the proposal this is not considered to be an onerous request.

In order to confirm the accuracy of the traffic data used to underpin the TA and traffic modelling, NWP have compared the Wylfa Newydd and North Wales Connection (NWC) TAs which it is considered are intrinsically linked. However, both TAs use different traffic data. Notably, at some of the key junctions highlighted in Horizon's TA, observed traffic volumes in 2017 from the National Grid TA are significantly higher – up to 11% than used in the Wylfa assessment.

As such, NWP contends that the assessment of the proposals has significantly underestimated the base position at key junctions and links and renders the future predictions of traffic and effect questionable.

#### Response 1

*The traffic surveys that inform the baseline traffic flows reported in the Wylfa Newydd TA were undertaken in 2014, 2015 and 2016. This data was then standardised to a 2016 baseline for all areas following the industry standard practice of using DfT and TEMPRO growth factors as set out in the TA [APP-101].*

*The comment above suggests that a comparison has been undertaken between the 2014 Wylfa Newydd traffic survey data and the NWC 2017 baseline flows. This is not a valid basis for comparison. The 2016 Wylfa Newydd baseline traffic flows should be compared to the 2017 NWC baseline traffic flows.*

*A comparison of NWC and Wylfa Newydd baseline traffic figures has been undertaken by Jacobs across several key areas of highway network which both projects have effects upon. In almost all cases, the Wylfa Newydd baseline flows are higher.*

*Note that all Highway Authorities agree with the baseline data submitted as part of the Wylfa Newydd DCO Application.*

*Horizon requests the that comparison undertaken by NWP be made available so Horizon can assess any differences and provide a full response.*

## **Comment 2**

Horizon state in their SoCG with NWP, reproduced in NWP DL3 submission, REF REP2-044, that it acknowledges that NWC TA has used more recent traffic data. This is an acknowledgment that the submitted TA is not an accurate reflection of the NWC TA i.e. that the Wylfa Newydd TA used the best available information at the time of its assessment to inform the TA. NWP is concerned that no further action is proposed to address this shortcoming.

## **Response 2**

*Horizon disagrees with the above assumption stated in the comment. The SoCG between National Grid Connection and Horizon does not state that the NWC has used more recent traffic data. It states that It is agreed that Horizon used the best available information at the time of its assessment to inform the Wylfa Newydd Project TA [APP-101]. This is in regard to the assessment of the cumulative impact of NWC on the Wylfa Newydd Project only and is not related to baseline flows.*

*As stated above, in the majority of cases, the Wylfa Newydd DCO baseline traffic flows are higher than those reported in the NWC TA. The baseline traffic and data collection has been undertaken in a clear and accurate way for the Wylfa Newydd Project and has been agreed by all Highway Authorities.*

## **Comment 3**

The scope of the TA was agreed by IACC and WG some time ago and updated traffic data needs to be acquired or sensitivity testing should be undertaken to understand the implications of this oversight. This will allow NWP to quantify the implications in terms of congestion, delay on the network. In turn this will enable NWP to proactively manage highway safety by providing the appropriate level of police resources to maintain existing service levels. Note that, depending on the level of effect, this may be different to what has previously been set out within the RPU Police Impact Assessment

## **Response 3**

*Horizon disagrees with the above statement. The TA submitted as part of the Wylfa Newydd DCO Project [APP-101] provides an accurate robust assessment of the traffic and transport impacts of the Project. Note that sensitivity tests on the impact of traffic on the Britannia Bridge have already been undertaken at the request of the Welsh Government. This information was provided to NWP in December 2018. This shows that even with a doubling of the proportion of construction workers living on the mainland, the impacts on Britannia Bridge are considered acceptable. This is owing to the fact that worker shift timings (which are controlled via the CoCP [REP2-031] to be further updated at Deadline 5) are set to avoid travel during peak traffic times across the Britannia Bridge.*

## **Comment 4**

Moreover, NWP considers that too much reliance is afforded to the Code of Construction Practice (CoCP) and the sub-CoCPs to control the assumptions made within the traffic forecasts and logistics management.

Given the potential implications on highway safety and police resources, it is not acceptable to rely on CoCP to do the job of sensitivity testing after the event has occurred – this is reactive and not proactive planning.

Consequently, sensitivity tests should be undertaken on the network – links and junctions to ensure that:

- The effect of any additional HGV movements arising from overestimated / changes in MOLF proportions, can be quantified.
- To appraise the effect of changes in shift patterns / operating hours.
- The effect of NWC Traffic (40, 2-way HGV movements per day) for 6 years on sensitive parts of the network (not just at Britannia Bridges) can be understood in delay and capacity terms.
- The proportion of car sharing at both Park and Ride and the development site car parks and the general effect of the Travel Plan principles can be tested.
- Flexibility of alternatives for the Temporary Workers Accommodation (TWA) to be located off site (as discussed at day 1 of the EIP) – what effect of housing these workers offsite would have on the local / strategic highway network.

NWP confirmed during the hearing that if the TA is revised, this may have an impact on the impact assessment carried out by NWP and this may need to be revised to take into account the revised TA.

#### **Response 4**

*The CoCPs are legally binding control documents. Failure of the applicant to adhere to these documents would be a breach of the DCO consent. Therefore these documents offer the highest level of commitment to controlling the Project within the presented limits. These limits include:*

- *Commitment to the worker shift timings which avoid travel over the Britannia Bridge during peak periods*
- *Commitment to include within the Code of Conduct for construction workers clauses on fly-parking and rat-running, with enforcement action taken if workers breach these clauses*
- *Commitment to deliver at least 60% of all construction materials via the MOLF, as assessed in the ES*
- *Commitment to control worker vehicle numbers by committing to an average vehicle share ratio of 2.0 workers per vehicle across the project in the peak construction year, as assessed in the ES.*
- *Commitment to limit HGV movements on the A5025 pre-opening of the A5025 Off-Line Highway Improvements to that assessed in the ES:*
  - *2,500 per month per direction*
  - *160 per day per direction*
  - *22 per hour per direction*
- *Commitment to limit HGV movements on the A5205 post-opening of the A5025 Off-Line Highway Improvements to that assessed in the ES:*
  - *3,500 per month per direction*
  - *160 per day per direction*
  - *40 per hour per direction*
- *Further changes coming in the next version of the CoCP to be submitted at Deadline 5 include:*
  - *Mode share targets for worker travel for each year of the construction programme in-line with assumptions made in the ES*
  - *More detail on how construction traffic will be managed, including ALLs*
  - *More detail on how traffic impacts will be monitored*
  - *More detail on enforcement*

*The Phasing Strategy [REP4-014], which is also a control document, commits Horizon to providing key mitigation such as the Temporary Workers Accommodation and MOLF at specific times. Any delay in the provision of mitigation would not enable Horizon to increase HGV flows above the caps already stated in the CoCP [REP2-031].*

*Therefore these documents are considered prescriptive and proactive, not reactive.*

*No revisions are proposed to the TA.*

#### **Comment 5**

Given the current uncertainty on the traffic modelling as forecasting as set out in response to 4b (i), NWP reserve the right to comment on this further subject to the detail of the response received from Horizon.

## Response 5

*See responses above.*

## Comment 6

Justification needs to be provided in relation to the strategy for locating the Logistics Centre and P&R at A55 junctions 2 and 4 respectively as both of these are key to the overall transport strategy and both have the ability to attract a significant quantum of traffic.

For example, NWP question the rationale for locating the logistics centre at A55 junction 2 compared to junction 3 at Valley. This means that for every HGV journey to Wylfa there is an unnecessary, additional 12km per vehicle in additional mileage with corresponding effects of congestion, noise and air quality issues. Given the volumes of HGV proposed and taken over 9 years this is a considerable effect.

## Response 6

*The justification of the siting of the Park and Ride Facility and Logistics Centre is provided in the corresponding Site Selection Reports [APP-440 and APP-441] submitted as part of the DCO. The rationale was also discussed at the Hearing on Traffic and Transport which was attended by Vectos.*

## Comment 7

In addition, NWP question why only one Park and Ride site has been chosen to accommodate some 26% of the projected workforce living offsite given the dispersed /rural nature of the catchment area. For example, 1600 workers (35%) living off site are stated not to use Park and Ride because of their location. It would be more appropriate to have numerous, smaller Park and Ride sites to maximise the efficiency and to limit the amount of private vehicle mileage (and hence effect) for the Park and Ride strategy.

## Response 7

*Park and Ride is one element of the transport strategy. As can be seen from Figure 7-3 of the Transport Assessment [APP-101], the majority (4,000) of the 8,600 construction workers in the peak year will walk/take internal transport within the site to get to work owing to the Site Campus. It is expected that a further 1,630 construction workers will access the WNDA via Shuttle Buses, 1,190 via park and ride (at 1.5 per vehicle), 1,550 to WNDA (at 3.0 per vehicle) and 230 will park and share en-route. Overall 66% of construction workers travelling to/from the WNDA site daily in the peak construction year will do so by non-car modes.*

*Horizon is confident that its DCO application contains all of the necessary parking (onsite and at Dalar Hir) to meet the requirements of the Wylfa Newydd Project and minimise the traffic and transport impacts. However, Horizon will consider the use of the proposed Park and Share facilities at Four Crosses, Gaerwen, Bangor and Caernarfon, on the basis that these Park and Share facilities are delivered by others, as a complementary component of the transport strategy for the Wylfa Newydd Project.*

## Comment 8

Given the concerns surrounding the TA, NWP need to have an element of control, or consultation, in relation to certain plans and documentation, or parts of certain plans, which are important in the context of transport.

Therefore, in order to secure adequate control and monitoring of the impacts on traffic and transport caused by the Project, the following Plans need to be prepared and secure through requirements in the DCO or the section 106 agreement (more details is included in Appendix 2 of the ISH2 DCO submissions made by NWP, also submitted at deadline 4):

- A Construction Traffic Management Plan

- An Operation Traffic Management Plan
- A Traffic Incident Management Plan
- A MOLF Operational Plan
- An AIL plan (See Reps DL2 – Page 37) and (DL3 reps, page 22)
- Monitoring and Manage the Approach to Car Parking: The updated CoCP at 3.4.20 proposes a "monitor and manage" approach to car parking. NWP consider this will be ineffective in requiring workers to utilise the alternative provision available. NWP submit that it would be necessary to secure a commitment to car sharing, including a specific number of car sharing parking spaces on site. Non-compliance of this should be managed more robustly than simply stating that spot checks could result in refusal of entry to the site.
- An Early Years Strategy to minimise effect on the network and ensure highway safety is not compromised prior to the MOLF and proposed bypasses.
- A Strategy for returning empty HGVs, particularly on the A5025 eastbound towards Amlwch.

## Response 8

*The current version (V2) of the CoCP (submitted at Deadline 2 – [REP2-031]) contains:*

- *a commitment to achieve a vehicle share target of 2.0 workers per vehicle across the Project in the peak year, in line with the ES assessment.*
- *a commitment to manage, monitor and regulate the availability of car parking spaces to reflect the number of workers on the Wylfa Newydd DCO Project, balancing an over-provision of car parking (which could encourage car travel) with an under-provision of car parking (which could encourage fly parking).*

*The next version of the CoCP to be submitted at Deadline 5 will contain more details on the management of construction traffic, including AILs, monitoring, and enforcement.*

*The next version of the CoCP to be submitted at Deadline 5 will also contain early-years HGV caps on the A5025 (before the Off-Line Highway Improvement Works are open) in line with the ES assessment as follows:*

- *2,500 per month per direction*
- *160 per day per direction*
- *22 per hour per direction*

*The next version of the CoCP to be submitted at Deadline 5 will contain mode share targets, how they will be monitored and reported and action to be taken if targets are not being met.*

*The current version (V2) of the Main Power Station Site sub-CoCP [REP2-032] contains a commitment to hold and release at regular intervals HGVs to avoid convoying, as far as practicable, from the Wylfa Newydd Development Area.*

*The CoOP contains the traffic management plan for the operational phase of the Project. Note that the next version of the CoOP to be submitted at Deadline 5 will include a commitment to provide a target of 1.5 permanent workers per vehicle in the Operational phase to align with ES assessment assumptions.*

*Note that it is not envisaged that any empty HGVs would route east on the A5025 via Amlwch. The prioritised route is the A5025 to the south and A55.*

## Comment 9

NWP consider a full monitor and manage section is required within the section 106 agreement, which provides the ability for NWP to monitor traffic data to check that the assumptions contained within the transport assessment are robust.

As stated above, if anything the assessment NWP has undertaken is based on a TA that may have underestimated the impacts, NWP have concerns that the quantum and therefore level of resource set out in the police impact assessment as being required to mitigate the impacts of the Project may be inadequate. This means that ongoing monitoring and management of the impacts on the road network is imperative. NWP need to be able to monitor the impacts against those proposed by the TA and must be able to revise its impact assessment and the quantum of mitigation required if the impacts caused by the Project are in fact greater than those set out in the TA. The details of this mechanism are set out in NWP's Section 106 Heads of Terms (Appendix 5 of NWP written representations REP2-345).

#### **Response 9**

*See above comments regarding changes to the CoCP on monitoring of traffic and transport impacts.*

#### **Comment 10**

In addition, and as previously set out in the NWP RPU Police Impact Assessment report, NWP request that extensive Automatic Number Plate Recognition (ANPR) is provided in addition to the DMATS monitoring system for HGV proposed.

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. ANPR has a wider safety role and is vital to maintaining community safety. This type of technology plays a fundamentally different role to the DMATS monitoring system proposed by the Applicant and is therefore needed as well as, rather than instead of, the DMATS system.

ANPR has wider benefits to the community other than monitoring HGV / construction traffic, and as such, is better suited to the wider security of North Wales. ANPR provides live data for all emergency services and can be used to track all vehicles. ANPR can also be used in connection with average speed cameras to ensure that vehicle speeds are kept to the prescribed limit to improve road safety particularly on the A5025.

NWP's RPU report has outlined the suggested locations for ANPR.

#### **Response 10**

*ANPR is not proposed to monitor vehicle movements. The DMATS system is more accurate and efficient than ANPR at tracking the Wylfa Newydd Project vehicles. Note that Hinkley Point C are intending to apply to remove the ANPR system in place in Somerset and switch this to a DMATS based system owing to the increased accuracy and efficiency of DMATS vs ANPR.*

#### **Comment 11**

NWP are concerned as to the robustness of the Applicant's TA, in that it may have underestimated the effect of this project from a highway and transport perspective.

The effect of the development on highway safety is a key issue for NWP in terms of the prevention and treatment of accidents occurring on the local / strategic highway network. Indeed, NWP take a proactive approach to highway safety as can be seen with improving highway safety records. Put another way, the fact that improving highway safety records exist show that NWP are doing their job properly, as accident prevention, rather than reacting to accidents. Maintaining the free flow of traffic on the roads and



junction is fundamental to this and the ability (or lack) of the highway network to accommodate significant, material increases in traffic should not be overlooked.

NWP is 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.

#### **Response 11**

*All impacts of the Wylfa Newydd DCO Project, including on accidents, have been assessed on the local and strategic highway network in Anglesey and Gwynedd. See Appendix E of the TA [APP-106].*

#### **Comment 12**

The Britannia Bridge is a critical pinch point on the network during peak times and whilst Horizon have considered traffic capacity, they have not considered the effect of highway disruption or damage only accidents resulting from large increases in HGV movements attributable to the proposed development.

Over the past 5 years NWP have been involved in dealing with 500 highway disruption and 23 damage only accidents at the Britannia Bridges. Importantly, and from an operational perspective, dealing with these events can take equal amount of NWP time and resources as some of the minor Personal Injury Accidents (PIA), particularly if a carriageway is blocked or an accident involves a HGV. Chief Superintendent Harrison submitted the bridge is closed a few times a month due to an incident.

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.

In addition, unfortunately, 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.

#### **Response 12**

*The Welsh Government is the highway authority responsible for the A55 including Britannia Bridge. The Welsh Government's response to the ExA's first written question regarding bridge closures (Q11.1.5) indicates that on average the Britannia Bridge is closed once per year which is not deemed substantial in terms of frequency of major disruption.*

*It is not required as part of the ES process to assess damage only accidents. The TA follows DfT best practice guidance on Transport Assessment and therefore any additional work in this area is not considered to be required.*

#### **Comment 13**

Due to the frequency of incidents, there needs to be a robust plan for the stacking and storage of HGVs during periods when the Britannia Bridge is closed.

#### **Response 13**

*At the request of NWP some 18 months ago, no Traffic Incident Management Plan was submitted as part of the DCO process despite Horizon having drafted one at this time. The actions Horizon will take in the event of an incident are included in V2 of the CoCP submitted at Deadline 2 [REP2-031]. Notwithstanding this, Horizon is offering a commitment to produce a Traffic Incident Management Scheme to be agreed by*



#### **Comment 14**

Given that NWP's concerns bring into question the validity of the applicant's TA in underestimating the effect of this project from a highway and transport perspective, it reserves the right to revise its police forecasting requirements, should the counter evidence provided by Horizon not be sufficiently robust.

Importantly, many of NWP's concerns are shared with various other statutory consultees.

As stated above NWP therefore require a review of the TA to be undertaken in order to address the concerns raised by NWP, followed by an updated assessment to be produced. In that regard, given, if anything the assessment NWP has undertaken is based on a TA that may have underestimated the impacts, NWP have concerns that the quantum and therefore resource that it has set previously in order to maintain the current level of policing on Anglesey will not be sufficient.

#### **Response 14**

*The additional information provided in this note should give NWP comfort that the traffic and transport impacts of the Project on the highway network are suitably controlled to the levels assessed as part of the ES.*

#### **Comment 15**

NWP agree that a cumulative assessment would need to be undertaken but do not consider there is sufficient information available at the moment to undertake a robust assessment that is underpinned by firm design proposals and an effective baseline on which to base it.

National Transport Guidance contained in the National Planning Policy Framework and Transport evidence bases in plan making and decision taking, clearly states that there should be consideration of the cumulative impacts of existing and proposed development on transport networks.

NWP agree with the submissions from WG and IACC that the cumulative effects of the NWC projects has not been assessed correctly. As such NWP cannot determine its resourcing requirements accurately.

Horizon's TA only assesses the effect of the NWC proposals at the Britannia Bridges REP3/020.

This is a fundamental oversight as the NWC proposals are inextricably linked and further more propose some 40 two-way HGV movements per hour over a period of 6 years. Whilst Horizon dismiss this effect as relatively small, the HGV forecasts from the NWC proposals are now commensurate with the revised hourly HGV profile for the Wylfa nuclear power station and so must be assessed correctly particularly on the A55 corridor.

It is also noted in the SoCG between the Applicant and NWC— REP2-044, there is an acknowledgment by the Applicant that the submitted TA is not an accurate reflection of the NWC TA and therefore this must be updated. NWP is concerned that no further action is proposed to address those shortcomings.

#### **Response 15**

*There is no acknowledgement in the SoCG between National Grid and Horizon that Horizon have included an inaccurate reflection of the NWC TA.*

*The Wylfa Newydd TA [APP-101] assesses the impact of National Grid Connection traffic across the Britannia Bridge using the most up to date traffic figures supplied to Horizon by National Grid at the time the TA was finalised. These were based on average flows per hour in the peak year of construction. Since Horizon submitted their DCO application, National Grid have submitted their own DCO application for the NWC scheme which assesses development traffic assuming 100% of LGV movements and 40% of HGV movements occur in two peak hours. This is highly unlikely to occur in reality.*

*Since the submission of the NWC DCO, NG have further refined their traffic estimates and will be submitting in the near future a VISSIM model of the Britannia Bridge using more accurate and up to date traffic flows which are aligned with the assumptions made in the Wylfa Newydd TA in relation to impacts on Britannia Bridge. Therefore Horizon is confident that the cumulative assessment submitted in the DCO TA is robust.*

*Regarding cumulative impacts away from Britannia Bridge, given the NWC DCO was submitted some three months after the Wylfa Newydd DCO, the NWC cumulative assessment is a more robust reflection of the cumulative impacts of the NWC and Wylfa Newydd projects. Therefore please see the NWC TA for further details. In addition, as report at the Hearing. NWC traffic is not expected to use the A5025 until after the completion of the A5025 Offline Highway Improvements.*

**End**