

Ms Kay Sully  
The Planning Inspectorate  
National Infrastructure Planning  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

**By email only**

Our Ref: 27102/A3/BL/D7/190417  
17<sup>th</sup> April 2019

Dear Kay,

**The Planning Act 2008**

**The Infrastructure Planning (Examination Procedure) Rules 2010**

**Application by Horizon Nuclear Power for an Order Granting Development Consent for the Wylfa Newydd Nuclear Power Station (Ref: EN010007)**

**Submissions for Deadline 10**

North Wales Police (NWP) is responsible for the provision of policing for and in the vicinity of the Wylfa Newydd Nuclear Power Station including its associated works. If consented, NWP consider that the proposed development will be the most significant policing challenge for North Wales Police for a generation. In this context, NWP registered as an interested party and has participated throughout the examination of the Wylfa Newydd Nuclear Power Station DCO.

It should be made clear that NWP does not object to the principle of the proposed development, it has simply sought to ensure that the anticipated impacts of the proposed development on its services can be effectively mitigated and the force's operational and public service duties are not compromised. To demonstrate the mitigation required, NWP carried out a detailed impact assessment of the proposed development on its operations. This assessment was submitted to the Examination and NWP sought a financial contribution from the Applicant, Horizon Nuclear Power, along with mechanisms to secure ongoing monitoring of all the DCO plans considered relevant to NWP's statutory functions (either through direct consultation with NWP or through an Emergency Services Engagement Group).

There has been a significant amount of dialogue between NWP and Horizon Nuclear Power Ltd (HNP), and between NWP and Isle of Anglesey County Council (IACC), particularly during the closing stages of the Examination. These discussions have been on matters relating to the proposed s106 agreement (its content and quantum), the proposed Deed of Covenant, and the mechanisms for, and role of, the Emergency Services Engagement Group in the approval and change management of DCO plans, strategies and schemes. Following this, we can confirm that NWP has reached agreement with

the Applicant on the matters raised through its previous submissions to the Examination.

We can confirm therefore that NWP has no outstanding objections to the Wylfa Newydd Nuclear Power Station DCO, subject to the conditions set out below. For clarity and the avoidance of doubt, the schedule annexed to this letter lists the versions of all submitted documents on which NWP's position is based, and which NWP would require to remain in its current form (insofar those matters relate to, or impact on NWP), in order to maintain no outstanding objection.

### **The Development Consent Order, Control Documents & Management Strategies**

Throughout the Examination, the interaction of the various plans and requirements proposed by the applicant as a means of securing the delivery of an appropriate form of development and any required mitigation has been a key area of concern for NWP.

In light of this, NWP has worked hard with the Applicant to ensure that all plans and strategies which may impact upon its statutory functions are adequately secured through the DCO and that robust change management processes are in place. NWP now considers that this has been achieved but this position is conditional upon the DCO and its associated s106 agreement including the provisions agreed between the parties prior to the close of the Examination. These agreed provisions are summarised below:

<b>Plan / Strategy</b>	<b>NWP Position at close of Examination*</b>
Wylfa Newydd Code of Construction Practice	NWP has no objection to the CoCP (Rep9-009) subject to the retention of the Requirement PW7 and Schedule 21 of the Order in relation to change management.  There are, however, a number of areas where the CoCP should be amended in the interests of clarity, accuracy and consistency with the Order and the s106 agreement. These were set out in NWP's Deadline 9 submission.
Workforce Management Strategy	NWP has no objection to the revised Workforce Management Strategy subject to the retention of the approval mechanisms set out in Requirement PW8 of the Order.
Wylfa Newydd Code of Operational Practice	NWP has no objection to the CoOP subject to the retention of the approval mechanisms set out in Requirement WN10 of the Order.
Wylfa Newydd Code of Conduct & Supplier Code of Conduct	NWP has no objection to the revised Workforce Management Strategy (REP8-064) subject to the retention of the approval mechanisms set out in Requirement PW8 of the Order.
Traffic Incident Management Scheme	NWP has no objection to the principles set out the CoCP (REP9-009) subject to the approval mechanisms set out in Requirement PW7 and Schedule 21 of the Order.
Protest Management Strategy	NWP has no objection to the principles included in the CoCP (REP9-009) in relation to the Protest Management Scheme subject to the approval mechanisms set out in Requirement WN1 and Schedule 21 of the Order

Plan / Strategy	NWP Position at close of Examination*
Community Safety Management Strategy	NWP has no objection to the principles included in the CoCP (REP9-009) in relation to the Community Safety Management Strategy subject to the approval mechanisms set out in Requirement PW7 and Schedule 21 of the Order.
Abnormal Loads Indivisible Management Scheme	NWP welcomes the introduction of specific reference to an ALL Management Scheme and has no objection to the principles set out in section 5.4 of the Deadline 8 CoCP subject to the approval mechanisms set out in Requirement WN1 and Schedule 21 of the Order.

*\*All references to 'the Order' and specific parts of the Order relate to the Horizon Nuclear Power Deadline 8 Submission - 3.1 Draft Development Consent Order (REP8-029)*

For the avoidance of doubt, we can confirm that NWP has no outstanding objections to any control documents or management strategies submitted by the Applicant but not listed in the above table.

### **DCO s106 Agreement**

On behalf of NWP, we can confirm that we received a final composite version of the draft s106 agreement on 8<sup>th</sup> April 2019. This has been duly reviewed, and agreement has been reached between NWP and the Applicant with respect to the content and quantum of contribution included within the DCO s106 agreement. It is understood that the applicant submitted the final composite draft s106 agreement at Deadline 9 (REP9-004), and on the basis that no further changes have been made to the agreed version, NWP confirms it has no objections to the quantum of contribution or the wording set out in the final s106 agreement.

### **Deed of Covenant with IACC**

We can confirm that NWP is content with the draft form of deed of covenant set out in the DCO s106 agreement and is hopeful that a final draft can be agreed with IACC and executed before the close of the Examination or shortly afterwards.

### **Statement of Common Ground between Horizon Nuclear Power and North Wales Police: Deadline 8 Submission (Ref: REP8-020)**

By way of an update, we can confirm that the Statement of Common Ground (Ref: REP8-020) submitted by the Applicant at Deadline 8 is a fair reflection of the matters discussed between the 2 parties up to Deadline 8. NWP has not been contacted by the Applicant to seek further amendments to the SoCG in advance of Deadline 10.

### **Conclusion**

NWP maintains its position that if mitigation is not properly secured for the purposes of the proposed development, the impact on community safety will be unacceptable and constitutes an unacceptable risk, such that NWP does not feel it will be able to properly protect the public. In the event, that any aspect of the DCO, the s106 agreement or the control documents and management strategies is amended prior to the Secretary of State's decision on the application, there is a potential risk that this could have a detrimental effect on police services and public safety. Therefore, NWP formally requests that it is re-consulted accordingly on any changes to the DCO, the s106 agreement or the control documents and management strategies following the close of the Examination.

We trust this submission clearly sets out NWP's position prior to the close of the Examination. Should you have any queries, please do not hesitate to contact me.

Yours sincerely,



**Ben Lewis**

Infrastructure & Energy Director

**Annex A****Schedule of all submitted documents subject to no objection by NWP**

<b>Title of document</b>	<b>Version</b>	<b>Application Reference Number</b>	<b>Examination Library Reference</b>	<b>Examination Deadline submitted on</b>	<b>Date of document</b>
Draft Development Consent Order	Revision 5.0	3.1	REP8-029	Deadline 8	25 <sup>th</sup> March 2019
Draft Development Order S106 Agreement	Revision 4.0	No reference provided	REP9-004	Deadline 9	10 <sup>th</sup> April 2019
Deed of Covenant, Schedule 19 of Draft Development Order S106 Agreement	Revision 4.0	No reference provided	REP9-004	Deadline 9	10 <sup>th</sup> April 2019
Wylfa Newydd Code of Construction Practice	Revision 5.0	8.6	REP9-009	Deadline 9	10 <sup>th</sup> April 2019
Workforce Management Strategy	Revision 3.0	8.17	REP8-064	Deadline 8	25 <sup>th</sup> March 2019
Wylfa Newydd Code of Operational Practice	Revision 5.0	8.13	REP9-023	Deadline 9	10 <sup>th</sup> April 2019
Wylfa Newydd Code of Conduct and Supplier Code of Conduct	Revision 3.0	8.17	REP8-064	Deadline 8	25 <sup>th</sup> March 2019
Traffic Incident Management Scheme	Revision 5.0	8.6	REP9-009	Deadline 9	10 <sup>th</sup> April 2019
Protest Management Strategy	Revision 5.0	8.6	REP9-009	Deadline 9	10 <sup>th</sup> April 2019
Community Safety Management Strategy	Revision 5.0	8.6	REP9-009	Deadline 9	10 <sup>th</sup> April 2019
Abnormal Indivisible Loads Management Scheme	Revision 5.0	8.6	REP9-009	Deadline 9	10 <sup>th</sup> April 2019