

**From:** [Geraint Hughes \(Siaradwr Cymraeg\)](#)  
**To:** [Wylfa Newydd](#)  
**Subject:** Responses to Examining Authority questions regarding Wylfa Newydd Power Station Project  
**Date:** 04 December 2018 21:28:57  
**Attachments:** [Written Questions NWFRS Responses Final.docx](#)

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Please find attached a response to the Examining Authority's first set of questions submitted on behalf of North Wales Fire and Rescue Service.

Please can you confirm receipt by return email.

Kindest regards

Geraint Hughes

Gwasanaeth Tân ac Achub Gogledd Cymru/North Wales Fire and Rescue Service

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Rydym yn croesawu gohebiaeth yn y Gymraeg a'r Saesneg - byddwn yn ymateb yn gyfartal i'r ddwy ac yn ateb yn eich dewis iaith heb oedi.

*We welcome correspondence in Welsh and English - we will respond equally to both and will reply in your language of choice without delay.*

**Gwnewch yn siŵr eich bod yn profi'ch larwm mwg yn rheolaidd. Os nad oes gennych larwm, neu os ydy'ch larwm wedi torri, ffoniwch **0800 169 1234**, anfonwch e-bost i [dtc@gwastan-gogcymru.org.uk](mailto:dtc@gwastan-gogcymru.org.uk) neu ewch i [www.gwastan-gogcymru.org.uk](http://www.gwastan-gogcymru.org.uk) am gyngor ynglŷn â beth i'w wneud nesaf.**

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**Cyfrinachedd:** Mae'r neges e-bost hon ac unrhyw ffeiliau a drosglwyddir gyda hi, yn breifat ac fe allent fod yn cynnwys gwybodaeth sy'n gyfrinachol neu'n gyfreithiol-freintiedig. Os byddwch yn derbyn y neges hon trwy gamgymeriad, a fyddech mor garedig â rhoi gwybod inni a chael gwared arni o'ch system ar unwaith.

**Ymwadiad:** Fe allai e-bostio trwy'r We fod yn agored i oedi, rhyng-gipio, peidio â chyrraedd, neu newidiadau heb eu hawdurdodi. Felly, nid yw'r wybodaeth a fynegir yn y neges hon yn cael cefnogaeth GTAGC oni bai fod cynrychiolydd awdurdodedig, yn annibynnol ar yr e-bost hwn, yn hysbysu ynghylch hynny. Ni ddylid gweithredu o ddibynnu ar gynnwys yr e-bost hwn yn unig.

**Monitro:** Bydd GTAGC yn monitro cynnwys e-byst at ddiben atal neu ddarganfod troseddau, a hynny er mwyn sicrhau diogelwch ein systemau cyfrifiadurol a gwirio cydymffurfiaid â'n polisiau.

Gwasanaeth Tân ac Achub Gogledd Cymru  
Parc Busnes Llanelwy, Sir Ddinbych. LL17 0JJ

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Gwasanaeth Tân ac Achub  
Fire and Rescue Service

# **North Wales Fire & Rescue Service**

## **Examining Authority's**

### **First Written Questions**

Wylfa Newydd Nuclear Power Station Project

PINs Reference: EN010007

NWFRS Examination Reference: 20011615

## **Application by Horizon Nuclear Power for the Wylfa Newydd Nuclear Power Station Project**

### **The Examining Authority's written questions and requests for information (ExQ1)**

**Issued on 06 November 2018**

The following table sets out the Examining Authority's (ExA's) written questions and requests for information - ExQ1. If necessary, the examination timetable enables the ExA to issue a further round of written questions in due course. If this is done, the further round of questions will be referred to as ExQ2.

Questions are set out using an issues-based framework derived from the Initial Assessment of Principal Issues provided as Annexe B to the Rule 6 letter of 25 September 2018. Questions have been added to the framework of issues set out there as they have arisen from representations and to address the assessment of the application against relevant policies.

Column 2 of the table indicates which Interested Parties (IPs) and other persons each question is directed to. The ExA would be grateful if all persons named could answer all questions directed to them, providing a substantive response, or indicating that the question is not relevant to them for a reason. This does not prevent an answer being provided to a question by a person to whom it is not directed, should the question be relevant to their interests.

Each question has a unique reference number which starts with 1 (indicating that it is from ExQ1) and then has an issue number and a question number. For example, the first question on air quality and emissions issues is identified as Q1.1.1. When you are answering a question, please start your answer by quoting the unique reference number.

If you are responding to a small number of questions, answers in a letter will suffice. If you are answering a larger number of questions, it will assist the ExA if you use a table based on this one to set out your responses. An editable version of this table in Microsoft Word is available on request from the case team: please contact [Wylfa@pins.gsi.gov.uk](mailto:Wylfa@pins.gsi.gov.uk) and include 'Wylfa Newydd' in the subject line of your email.

Responses are due by **Deadline 2: 04 December 2018**.

ExQ1	Question	NWFRS Response
4.0	<b>Development Consent Order – General Questions</b>	
Q4.0.111	<p>Section 7.4 of the Planning Statement [APP-406] deals with Planning obligations and outlines the proposed heads of terms. Please set out how the proposals would meet with the tests for planning obligations.</p>	<p>In terms of scale North Wales Fire and Rescue Service (NWFRS) provides a Fire and Rescue Service for the area of the six Local Authorities which make up North Wales, and whilst it believes that the impacts of the development will be felt across the whole region, it acknowledges that this will be most acute on Ynys Môn and parts of Gwynedd and Conwy.</p> <p>NWFRS notes that Horizon proposes to have an onsite emergency response unit for the construction site and that financial contributions may be made by Horizon to the emergency services to ensure that adequate resources were available in the locality of the development.</p> <p>In addition to this NWFRS has highlighted a concern that staff may be displaced from a public sector employer to the Wylfa Newydd site in search of better paid employment. Such impacts would detrimentally affect NWFRS’s ability to provide an adequate service to the community – this being as a direct impact of the development.</p> <p>NWFRS considers that the proposed heads of terms meet the tests for planning obligations although it has yet to see any detail.</p>
Q4.0.114	<p>A Programme Board would be responsible for setting and reviewing the monitoring programme and having an oversight of the funding from the Section 106. Can further details be provided as to how this would work in particular what process/mechanism would be put in place in the event of a dispute?</p>	<p>NWFRS understands that the developer will need to ensure that mitigation is in place to off-set known impacts that the proposed development will have on the community and/or existing services. Further additional mechanisms will be required to ensure that the mitigation in place ensures that there is no impact on the community and that funding is available to address unintended or unforeseen impacts in a timely manner.</p> <p>NWFRS considers that an oversight board with responsibility for the monitoring of the impacts is appropriate, however the board should not sit under the auspices of the developer – it should be independent and be proactive in assessing adequacy of mitigation i.e. early intervention could be financially more prudent rather than reacting to a situation that has had a negative effect on the community.</p> <p>NWFRS recognises that the Local Planning Authority has a statutory function in relation to the implementation of section106 agreements and that this cannot be circumvented.</p>

ExQ1	Question	NWFRS Response
<b>10.1</b>	<b>Accommodation</b>	
<b>Q10.1.19</b>	<p>Whilst the availability of accommodation has been looked at with regard to affordability has any assessment of the suitability of accommodation for workers been undertaken? If so what criteria were used?</p>	<p>NWFRS has provided comment to the developer during discussions regarding the importance of ensuring that accommodation made available for construction workers meets acceptable safety standards and that those available for rent must be registered with, and meet the requirements of, the Rent Smart Wales Scheme.</p> <p>NWFRS has posed the question to the developer, how would the proposed Worker Accommodation Management Service (WAMS) be assured, that properties registering with it to provide accommodation meets the standards and have appropriate fire safety measures in place?</p> <p>Whilst housing enforcement is the primary responsibility of the Local Authority, NWFRS has a responsibility to enforce the Regulatory Reform (Fire Safety) Order 2005 which would include reviewing Fire Risk Assessments and the adequacy of provisions made to mitigate any highlighted risks.</p>
<b>10.3</b>	<b>Health</b>	
<b>Q10.3.1</b>	<p>Paragraph 6.3.95 of the Planning Statement [8.1] lists potential adverse impacts on health and well-being. Do you agree and if not, why not?</p>	<p>NWFRS notes the potential adverse impacts listed but considers that Construction Worker Accommodation, and specifically those in the community, should also be included where the risk of displacement of vulnerable citizens from the private rental sector to make way for construction staff may have a detrimental impact on well-being.</p> <p>NWFRS is of the opinion that by ensuring that the proposed site campus is developed fully, in the early stages of construction, that this may reduce the initial influx of construction staff into the community. The displacement of vulnerable individuals and the consequent impact on their well-being would place additional burdens on public services, such as NWFRS, who work to ensure the safety and well-being of vulnerable individuals and the community in which they live.</p>
<b>Q10.3.7</b>	<p>The applicant intends to establish a Health and Well-being Monitoring Group to monitor the implementation of the Health Impact Assessment mitigation. Do you have the</p>	<p>NWFRS regularly engages with other key stakeholders with regards to health and well-being of citizens, particularly where individuals are at risk and/or display risky behaviours requiring multi-agency solutions to address such issues.</p> <p>NWFRS does have the relevant staff who are able to engage both at practitioner and</p>

ExQ1	Question	NWFRS Response
	relevant staff and resources available to participate in this group?	managerial level, but this would have an impact on current service provision for which mitigation would be required.
<b>10.6</b>	<b>Socio-Economic – General Questions</b>	
<b>Q10.6.3</b>	Paragraph 3.2.15 of the Wylfa Newydd Code of Construction Practice (WNCocP) [APP-414] lists a number of socio-economic impacts that the Applicant considers will need monitoring. Do you agree with this list? Has anything been omitted or should anything be removed?	<p>NWFRS agrees in principle with the list but notes that the final list is to be agreed by the Programme Board.</p> <p>NWFRS would suggest that data relating to all accidents and near misses inclusive of road traffic collisions (RTC's), fires and other injuries which involve construction staff is captured in order that trends or emerging issues directly attributable to this group can be identified. This will ensure that appropriate mitigation can be sought, from the applicant, to address issues.</p>
<b>Q10.6.11</b>	Apart from backfilling positions (Paragraph 1.6.6 of the ES [APP-088]) what other measures are proposed to ensure that there would be sufficient trained volunteers or full time fire and rescue officers available to provide sufficient cover for Ynys Môn?	<p>NWFRS does not have volunteer firefighters. Holyhead Fire Station is a Wholetime Day Crewed Station with optimum crewing of 5 personnel on-station between 12:00hrs and 22:00hrs. At all other times cover is provided by response to alerters from on-call staff.</p> <p>The remaining stations on Ynys Môn operate the Retained Duty System (RDS) - personnel who are either self-employed or have a primary employer who provide on-call cover when available. These individuals can provide cover from their place of employment, with their employers' permission, or from home. RDS personnel must be able to respond to the station within 5 minutes of being alerted to an incident.</p> <p>NWFRS highlights that the recruitment and retention of RDS personnel is challenging as is the management of appliance availability which is dynamic in nature. Constant movement of individuals has to be undertaken to ensure that appliances are strategically available.</p> <p>NWFRS notes the Applicant's Scope of Service document regarding a Fire and Rescue provision at the Wylfa Newydd Development Area (WNDA) for the construction period. Initial assessment suggests that this will be a first strike provision and that there will be a requirement for NWFRS to provide a response and backup to most, if not all, incidents. A further assessment will be required when it is known what level of provision is proposed by the providers.</p>

ExQ1	Question	NWFRS Response
		<p>NWFRS's impact assessment of the development suggests that it will require a constant emergency response provision in close proximity to ensure that it can respond to incidents both within the community and to the site without a detrimental impact to the current fire cover provision on Ynys Môn.</p> <p>There are options on how to best achieve this but given that the impact will be a direct result of the development NWFRS will require mitigation to ensure that it can provide the most appropriate fire cover.</p>
<b>Q10.6.12</b>	<p>The Codes of Construction Practice would rely on an overarching Programme Board and a series of engagement sub-groups (including for accommodation and tourism).</p> <p>(a) How would these boards/sub-groups work in particular who would they be accountable too?</p> <p>(b) Would they have a code of governance?</p> <p>(c) It is indicated that you would be asked to be represented on these boards do you have the resources and the relevant personnel available to attend these boards?</p>	<p>(a) NWFRS is concerned that the proposed board and sub-groups may be overly bureaucratic with the potential for the work of sub-groups to be duplicated given the cross cutting issues that they will be looking at. It is believed that the sub-groups will report to the board which would ultimately have responsibility for taking action where required to address identified issues.</p> <p>(b) NWFRS is of the view that the board and sub-groups would need to have an accepted code of governance together with a mechanism to escalate issues for a resolution where this cannot be agreed.</p> <p>(c) NWFRS has identified that, given the scale of the development, it will require a dedicated resource to work on the project for the duration of the construction phase. NWFRS would need to secure funding from the developer to support this.</p>