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Gwasanaeth Tân ac Achub
Fire and Rescue Service

North Wales Fire & Rescue Service

Examining Authority's

Further 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 (ExQ2)

Issued on 30th January 2019

The following table sets out the Examining Authority's (ExA's) written questions and requests for information - ExQ2. Questions are set out using an issues-based framework derived from the Initial Assessment of Principal Issues provided as Appendix 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 2 (indicating that it is from ExQ2) and then has an issue number and a question number. For example, the first question on air quality and emissions issues is identified as Q2.1.1. 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 Wyla@pins.gsi.gov.uk and include 'Wylfa Newydd' in the subject line of your email.

Unfortunately given the timescales, it has not been possible to publish a Welsh language version of the Further Written Questions simultaneously with the English language version. It is our intention to publish a full translation of all Further Written Questions in the Welsh language as soon as reasonably possible. We will advise as and when these are published via the banner on the project website.

Responses are due by **Deadline 5, Tuesday, 12 February 2019**

ExQ2	Question	NWFRS Response
4.0	Development Consent Order	
Q2.4.12	<p>PW2 – Wylfa Newydd CoCP</p> <p>Many IPs have raised concerns that should the detail of the CoCP not be agreed prior to the end of examination, than existing CoCPs and sub codes are treated as statements of principle/parameters and that further detail would need to be approved by IACC using pre-commencement requirements.</p> <p>1) Could this approach create the possibility of an uncertain scheme which hasn't been properly assessed?</p> <p>2) Would this approach to requirements be lawful, given Rochdale principles, and is reasonably intended to fix 'finalised aspects' at a later date?</p> <p>In responding to this question, attention is drawn to paras 103 and 104 of pre-application guidance.</p>	<p>North Wales Fire and Rescue Service (NWFRS) is aware that the applicant proposes to submit a revised CoCP and sub codes at Deadline 5 however this will not allow sufficient time for this to be reviewed and a position agreed prior to the submission of final SoCG at Deadline 6.</p> <p>NWFRS is mindful that agreed documents are fundamental to underpinning the mitigation strategies and that it is the basis on which stakeholders undertake their impact assessments and come to a consensus with the developer where mitigation is required in relation to s106 agreements.</p> <p>Stakeholders cannot be expected to agree to a quantum relating to mitigation when the mitigation strategies and control documents have not been agreed as this has the potential to financially impact organisations in the longer term.</p>
Q2.4.17	<p>PW8 – Code of Conduct</p> <p>IACC, WG, NWP, and others want this to be part of DCO and not 'for information'. WG states "Fundamental importance that the DCO requires all mitigation strategies and control documents to be submitted for approval by the relevant body in consultation with any other relevant body specified so that it covers the right detail to secure mitigation and to be implemented and enforced." It proposes that approval should be via IACC in consultation with GCC and CCBC on basis that some of the mitigation will fall within responsibility of those authorities in addition to IACC.</p> <p>The Applicants position is that this would be prepared in</p>	<p>NWFRS would agree with the position adopted by other key stakeholders that the Code of Conduct should form part of the DCO and thus subject to an approval process by the relevant body – this would ensure that the Code of Conduct delivered the aims of the Workforce Management Strategy. The approval process should include consultation with stakeholders upon whom it may impact.</p>

ExQ2	Question	NWFRS Response
	<p>accordance with the Workforce Management Strategy which would be a certified doc.</p> <p>1) Why does this approach not satisfy IACC, WG, NWP and others?</p> <p>2) Or should PW8 provide details of how the Code of Conduct should be approved, monitored and enforced including in consultation with North Wales Police?</p>	
<p>Q2.4.19</p>	<p>PW11 – Community Safety Management Strategy (CSMS)</p> <p>NWP proposes an amendment to the requirement so that NWP is the body who approves the document and that this needs to be done within 2 months of receiving the draft document.</p> <p>An alternative approach would be that IACC approves the document in consultation with NWP.</p> <p>1) Would IACC and NWP resist this proposal?</p> <p>2) Should the CSMS be included as a Certified document under Schedule 18?</p>	<p>NWFRS recognise that the CSMS is a key document in identifying the approach to ensuring the safety of the community during the construction of Wylfa Newydd. It will set the strategy for mitigating the negative impacts of the development whilst identifying the most appropriate resources to address issues. NWFRS engage with stakeholders, including NWP and IACC, in delivering on Community Safety matters.</p> <p>NWFRS are of the opinion that the CSMS should be subject to consultation and agreement with the Emergency Services Engagement Group (ESEG) prior to IACC granting approval. This would ensure that the expectations on the blue light services were within their statutory responsibilities and deliverable.</p> <p>NWFRS do not consider that the CSMS should be included under Schedule 18.</p>
<p>Q2.4.46</p>	<p>Several IPs have expressed support for an Emergency Services Engagement Group.</p> <p>Do IPs wish to comment?</p> <p>If such a group were to be formed, how could this be secured in the DCO?</p>	<p>NWFRS would welcome the formation of an ESEG which would provide the Blue Light services with the opportunity to engage in the process of reviewing, consultation and agreeing to the content of plans / strategies secured as part of the DCO process.</p> <p>NWFRS consider that the s106 agreement would be the appropriate mechanism to secure the formation of the ESEG and to identify its remit/terms of reference.</p>

ExQ2	Question	NWFRS Response
	Part 1 - Section 106	
Q2.4.51	<p>In the long term there would be an increase in revenue from Council and Business Tax should the DCO be consented. Would this be used to fund additional services required as a result of the development? At the ISH on the 7 January it was indicated that this would be reflected in the S106 as a number of the contributions sought would be for short term and/or interim measures to cover any shortfall in service provision that might arise before the increase in revenue could be delivered. Indicate which contributions this would apply to. Where a contribution is being sought to cover an existing service long term, why would this be necessary?</p>	<p>NWFRS is financed by each of its constituent authorities (Isle of Anglesey County Council, Gwynedd Council, Conwy County Borough Council, Denbighshire County Council, Flintshire County Council and Wrexham County Borough Council) who contribute, in respect of each financial year, a sum equal to its appropriate portion of the net expenses. The contribution made by the Local Authorities is dependent upon the population numbers - the population in any area being the number of persons usually resident in that area. It is noted that any increase in Council and Business Tax revenues would only go to IACC, therefore IACC would benefit from any future increase in revenue however all LA's would be expected to increase their contribution to cover any increased activity.</p> <p>In the long term, Operational phase of the proposed development, it is probable that the vast majority of, if not all, staff will reside within North Wales and therefore any increase in the population will reflect on the contributions from the relevant constituent authorities.</p> <p>During construction, given the transient nature of the majority of the construction workforce, it is unlikely that the population increase will be realised in its impact on the budget of NWFRS and hence the requirement for mitigation to be secured through the s106 Agreement for the duration of the construction phase.</p>
10	Socio Economic	
	Employment	
Q2.10.27	<p>Can you indicate what specialist support you would provide for organisations to back fill positions in key worker roles such as health and social care, language specialists or the emergency services that could be created by the displacement of staff to work on the project?</p>	<p>NWFRS note that HNP refer to the Jobs and Skills Implementation Plan (JSIP) and to the Wylfa Newydd Employment and Skills Service (WNESS) and that it believes that this will provide a supply of job ready people equally skilled to back fill any vacancies.</p> <p>NWFRS are of the opinion that should the WNESS identify individuals with the requisite skills, as a competent operational FF, that it is inevitable that they will be</p>

ExQ2	Question	NWFRS Response
		<p>considered for roles within the Wylfa Newydd Fire and Rescue Service. Given the detail within the Scope of Service Document WNFRS staff will be expected to reside within the Temporary Worker Accommodation (TWA) and thus not available as potential RDS FF for NWFRS as they will be too far from the nearest NWFRS fire station.</p> <p>As has been previously identified in NWFRS Written Representation (REP2-344) Impact No.1, Page 12 RDS staff are required to be able to respond to their nearest station within 5 minutes of being alerted to an incident. The employment of individuals as RDS FF is based not only on their proximity to their local fire station but also takes into consideration their availability i.e. the number of hours they are available.</p>
Q2.10.28	Can you outline how you would work with/support NWFR to ensure that the fire service provision for Ynys Môn currently delivered through the retained fire crews could be maintained throughout the construction and operational phases of the scheme.	<p>NWFRS have provided an initial indication to HNP as to the proposed mitigation in order to ensure a fire and rescue provision on Ynys Môn focusing on the communities impacted by the development and the requirement to respond to incidents at the site.</p> <p>Further work is being undertaken to refine the proposal however this is being completed at a time when the required detail is not available and the proposed on-site provision may change when the project is re-established.</p>
	Health	
Q2.10.34	An on-site paramedic, ambulance and firefighting team are proposed at WNDA. Who would be responsible for responding to incidents off site (eg at the Park and Ride or the logistics centre)?	<p>NWFRS acknowledge that the Scope of Service document for the WNFRS identifies the need for an on-site provision with the capability of being able to effect a rescue within 15 minutes of a suspension trauma.</p> <p>The proposed locations of the Park & Ride and the Logistics Centre, is a considerable distance from the WNDA and therefore an attendance by the WNFRS would not be appropriate. NWFRS have fire stations located closer to these sites and would be a more appropriate response.</p> <p>It is noted that HNP have suggested that WNFRS would respond to the proposed Off-site Power Station Facilities (MEEG/AECC/DSL) at Llanfaethlu whilst recognising that should this be the case that appropriate cover would need to be provided at</p>

ExQ2	Question	NWFRS Response
		the main site in order to meet requirements as identified above. NWFRS personnel are not currently trained to effect suspension trauma rescues especially considering the potential height of the proposed cranes on site. Any expectation on NWFRS to provide such cover will require agreement and that personnel are adequately trained to undertake such rescues.
13	Deadline 4 Change Requests	
	Worker Shift Patterns	
Q2.13.8	1) Any comments with regards to the proposed change to workers shift patterns? 2) With regards to the proposed change would it result in a material or non-material change to the application? Please explain your reasoning.	NWFRS provided a response at Deadline 4 (REP4-042) and have no further comment to make.
	HGV Movements	
Q2.13.16	1) Any comments with regards to the proposed change to HGV movements? 2) With regards to the proposed change would it result in a material or non-material change to the application? Please explain your reasoning.	NWFRS provided a response at Deadline 4 (REP4-042) and have no further comment to make.
	Working Hours	
Q2.13.22	1) Any comments with regards to the proposed change to working hours? 2) With regards to the proposed change would it result in a material or non-material change to the application? Please explain your reasoning.	NWFRS provided a response at Deadline 4 (REP4-042) and have no further comment to make.
14	General Questions	

ExQ2	Question	NWFRS Response
<p>Q2.14.10</p>	<p>The ISHs in March will consider the proposed WNDA and its constituent spatial elements in particular what is proposed for the site; what mitigation would be required and how this would be secured through the dDCO, CoCP and subCoCPs or the S106.</p> <p>The ExA propose to consider the WNDA as a whole but also propose on an individual basis to address the Marine Off Loading Facility and Breakwater; the Main Power Island Site; the Site Campus/Temporary Workers Accommodation and the other on-site developments. In considering these elements particular attention will be paid to issues in relation, but not limited, to the following effects individually and in combination:</p> <ul style="list-style-type: none"> • Landscape and visual; • Historic environment; • Good design; • Lighting; • Noise and Vibration; • Air Quality and Dust; and • Waste management and radioactive waste management. <p>A second ISH on 'Other Sites' will consider the same range of issues on a similar basis for:</p> <ul style="list-style-type: none"> • Off Site Power Station Facilities site; • Dalar Hir Park and Ride site; • Parc Cybi Logistics Centre; • A5025 Off-line Highways Improvements; and • Ecological Compensation sites. <p>With reference to the emerging SoCG are there any</p>	<p>NWFRS have provided HNP with an initial indication of the likely quantum required during the construction phase to mitigate for the potential impact of the development on its ability to provide appropriate Fire and Rescue Service for the communities in the vicinity to the site or served by the main construction routes. In addition the proposed WNFRS Scope of Service recognises that there will be an expectation on NWFRS to support it as and when required which will need to be mitigated for.</p> <p>NWFRS are reviewing its assessment however it is noted that there is a significant difference in the calculated required mitigation and the quantum being suggested by HNP.</p> <p>With the current status of the project no further detail on the scope/provision of the WNFRS is forthcoming and it is likely that agreement will not be reached by the end of the examination.</p>

ExQ2	Question	NWFRS Response
	areas/topics in relation to the WNDA or the Other Sites where you consider agreement may not be reached before the end of the examination, bearing in mind the evidence both oral and written that has been submitted to date, and which you would wish the ExA to consider at these ISHs?	