

From: [Geraint Hughes \(Siaradwr Cymraeg\)](#)
To: [Wylfa Newydd](#)
Subject: Written Representation relating to Wylfa Newydd Power Station Project
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Attachments: [Written Representation NWFRS Final.docx](#)

Please find attached Written Representation submitted on behalf of North Wales Fire & 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

Ffôn/Tel: 07787578402

Ffacs/Fax: 01248 725144

geraint.hughes@gwastan-gogcymru.org.uk / geraint.hughes@nwales-fireservice.org.uk

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Ymwadiad: Fe allai e-bostio trwy'r We fod yn agored i oedi, rhng-gipio, peidio â chyrraedd, neu newidiadau heb eu hawdurdodi. Felly, nid yw'r wybodaeth a fyngir 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.

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Gwasanaeth Tân ac Achub Gogledd Cymru
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Gwasanaeth Tân ac Achub
Fire and Rescue Service

Written Representation

Impact of Wylfa Newydd Development Consent Order (DCO)

PINs Ref No. EN010007

on

North Wales Fire and Rescue Service

Ref No. 20011615

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1. Overview

This paper identifies the common ground and the key issues where there is justification for Section 106 obligations towards mitigation measures required by North Wales Fire and Rescue Service (NWFRS). The mitigation would be required to reduce the impacts that the Development Consent Order (DCO) may have in relation to the construction of Wylfa Newydd Power Station.

Payments that NWFRS may seek will be specific to cost recovery only and will be based on the increase in resources that NWFRS believes it will need to provide, arising from the proposed new build and associated developments, which NWFRS consider go beyond making provision to meet normal requirements.

All comments and calculations are based on the information available at the time of writing. NWFRS reserves the right to review any proposed measures that may become inadequate in the light of any additional information identified during the period of construction, and consequently to re-calculate the impact on NWFRS.

Key Issues

On the basis of the information obtained to date NWFRS believes that the main works involved in the Wylfa Newydd development go beyond the “normal” requirements that it is statutorily obliged to meet and raise risks that will place additional resource demands on the Service. NWFRS further believes that these additional demands will be of such a scale that, unless the developer can provide funding and/or make alternative provision to mitigate them, there will inevitably be increased costs that could be passed on to public finances. These potential risks include:

- an increase in traffic that will have an adverse impact on the Service’s response times (including the time taken for mobilising of resources) to incidents in and around the developments;
- an increase in the number of incidents the Service attends as a direct result of the new developments;
- new risks requiring the provision of additional training for NWFRS personnel, such as maritime incidents;
- an increase in work associated with business fire safety auditing and enforcement, as a direct result of both the number and types of accommodation that will be occupied by the migrant workforce;
- an increase in work associated with the provision of community-based prevention activity to both settled and migrant communities to mitigate the risks of fire and its consequences;
- a significant impact on managers’ time and resources in order to provide effective liaison with Horizon and to manage the consultation process effectively;
- the loss of NWFRS staff to roles in the new development which could impact both frontline and support functions.

Operational response and preventative community safety work are key priorities for NWFRS, and the development has the potential to have a high impact - especially on Ynys Môn, and more precisely the A5025 corridor from Valley to Amlwch. These impacts will result in an increased demand on NWFRS which it will not be able to meet without the provision of additional dedicated resources. Failure to have appropriate dedicated resources would, in the event that NWFRS has to respond to incidents associated with the main development builds, be at the expense of a reduced service to the community or an additional financial burden to it.

The size, nature, complexity and time constraints associated with the submission of the DCO application makes it difficult for NWFRS to specifically identify all of the proposed mitigation. NWFRS requires that Horizon identifies and presents all the proposed mitigations associated with the impacts highlighted by NWFRS.

The size and scale of the development is larger than any other development experienced in North Wales for some time and NWFRS has liaised with colleagues in Devon and Somerset Fire & Rescue Service (DSFRS), who are currently dealing with the construction of Hinkley C Power Station to identify the impacts which the development, similar in scale to Wylfa Newydd, has had on DSFRS and the steps required to mitigate these.

The resources identified to help mitigate the impact on NWFRS during the construction are:

- the provision of a fully trained, staffed and equipped firefighting resource on site 24/7 during the period of the build;
- development and refresher training for personnel who may be required to engage in dealing with incidents on vessels alongside at the Marine Off Loading Facility (MOLF) i.e. Maritime Firefighting;
- a contribution towards facilitating site familiarisation visits by local crews during the construction period;
- a contribution towards the funding of Community Safety and Business Fire Safety staff due to the additional workload relating to the development;
- a contribution towards funding the Officer Liaison/Incident Planning role for the period of the build.

Table 1 Summary of Impacts

Impact description	Positive/Negative	Impact classification		
		Disagree with HNP	Additional	Agree with HNP
1. Increase in Retained attendance times to stations NWFRS has concerns about the increase in site traffic and commuting construction workers, and the severe detrimental effect that the resulting traffic congestion will have on the ability of Retained firefighting personnel to turn in to their fire station within 5 minutes in response to an emergency call. In such circumstances it is Service policy to alert the next nearest fire station after this time period, causing further delays, incurring additional costs, and increasing the life risk to the local community and the general public.	Negative	√		
2. Increase in attendance times to incidents NWFRS has concerns that the additional traffic – especially HGV's – will lengthen the time it takes for fire and rescue appliances to arrive at emergency incidents. Consequent impacts relate to: increased life risk to local communities and the general public; increased risk to personnel attending the incidents; failure to achieve normal response times; loss of public confidence; increased costs of additional mobilising.	Negative	√		
3. Increase in number of Road Traffic Collisions NWFRS has concerns about the potential increase in the number of road traffic collisions and also about the severity of these incidents, especially given the increased likelihood that such incidents will involve larger, heavier vehicles (HGVs). Apart from the additional risk to life, there would be a direct cost impact for NWFRS of attending more such incidents as well as the associated impact of maintaining sufficient emergency vehicles available whilst dealing with the incidents themselves, further complicated by the effect of the congested road network on being able to respond quickly (life risk) to other incidents.	Negative	√		
4. Increase in the number of incidents as a result of the construction of Wylfa Newydd NWFRS has concerns that the onsite emergency fire and rescue response proposed by Horizon Nuclear Power (HNP) will not be suitable and/or sufficient to provide adequate cover for the site. Any response by NWFRS to the Wylfa Newydd Development Area (WNDA) or associated developments during the build will not only have direct financial implications for NWFRS, but will also have a consequent	Negative	√		

Impact description	Positive/Negative	Impact classification		
		Disagree with HNP	Additional	Agree with HNP
effect on the emergency cover provided to the wider community in terms of reduced/delayed response (increasing the life risk).				
5. Additional risks requiring mitigation During the development of Wylfa Newydd additional risks will be introduced for which NWFRS will need to have made provision e.g. by providing appropriate personnel with relevant training to deal with maritime incidents.	Negative	√		
6. Community Safety and Business Fire Safety NWFRS is looking to recover costs for the anticipated increase in Community and Business Fire Safety work as a result of the new build. Most of the impacts listed above have the potential to increase the risk to life within local communities and NWFRS will be seeking to mitigate the risk through preventative work, including with the construction workforce itself and within the communities where they will be staying. There is also the increase in cost which is not recoverable retrospectively, and which will ultimately be passed on to the community.	Negative	√		
7. Risk Planning and Liaison The development and the constant changes during construction will place additional burdens on NWFRS's maintenance of suitable and sufficient plans for responding to specific risks and locations (including those on-site). Regular review (potentially revision) of its operational plans will be required to ensure their continuing suitability and sufficiency to respond to specific risks on site. Additionally, the wider impact of the development will require regular liaison with the developer and the community. A construction project on the scale of Wylfa Newydd will see considerable changes to both the environmental and geographical landscape of the area, as well as changes to the risks which crews may be exposed to in the event of having to respond to incidents. It is anticipated that both the site layout and the road layout will change on a fairly regular basis, increasing the risk of delay in responding to incidents and of an associated detrimental effect to workers and site infrastructure.	Negative	√		

Impact description	Positive/Negative	Impact classification		
		Disagree with HNP	Additional	Agree with HNP
<p>8. Displacement of staff to Wylfa Newydd</p> <p>Recruiting and retaining staff is a continuous challenge for NWFRS, not least because the majority of its firefighters are employed under the terms of the Retained Duty System (RDS). The RDS is a well-established and nationally recognised system of providing fire cover in more rural locations but is notoriously difficult to recruit to and incurs a high turnover because of the challenges for individuals who balance their availability within close proximity of a designated fire station with their primary employment and personal commitments.</p> <p>NWFRS has concerns that the opportunities available with the development of Wylfa Newydd will place additional pressure on the Service's frontline, support and back office capacity, requiring additional resources to be allocated to attracting, recruiting, training and retaining staff.</p>	Negative	✓		

2. Policy

The Fire and Rescue Services Act 2004

Identifies that Fire and Rescue Authorities (FRA's) must:

- Make provision for the purpose of extinguishing fires in its area and protecting life and property in the event of fire;
- Secure the provision of the personnel, services and equipment necessary efficiently to meet all normal requirements;
- Promote fire safety;
- Rescue people in the event of road traffic accidents and protect people from harm at such events;
- Respond to other emergencies which may include: chemical, biological, radioactive and Nuclear incidents¹, rescues from flooding²; and
- Have regard to Welsh Government – Fire and Rescue National Framework 2016

Welsh Government - Fire and Rescue National Framework 2016

This sets out the Welsh Government's vision and priorities for FRAs in Wales around six key themes:

- Continually and sustainably reducing risk and enhancing safety of citizens and communities;
- Responding swiftly and effectively to incidents;
- Being clearly and publicly accountable for delivery and funding, manifesting the highest standards of governance;
- Maintaining downward pressure on costs taking all opportunities to realise efficiencies;
- Working effectively with partners to improve efficiency and citizen and community well-being;
- Valuing and developing the workforce to the highest standards

The Well-being of Future Generations (Wales) Act 2015

This sets out Welsh Government's goals for and is about improving the social, economic, environmental and cultural well-being of Wales.

FRAs are a public body listed in the Act, and are required to think more about the long-term, work better with people and communities and with each other, look to prevent problems and take a more joined-up approach.

The Regulatory Reform (Fire Safety) Order 2005

This is the principal piece of fire safety legislation and requires that responsible persons in all premises, other than single private dwellings, carry out fire risk assessments and act on any findings in order to reduce the risk to occupant safety. Auditing activity and taking enforcement action in relation to identified failures is the responsibility of Fire and Rescue Authorities so as to ensure people are protected from fire in places such as workplaces, hotels, hospitals, entertainment venues and similar premises.

¹ The Fire and Rescue Services (Emergencies) (Wales) Order 2007, SI 2007 No. 3193 (W. 280)

² The Fire and Rescue Services (Emergencies) (Wales) (Amendment) Order 2017, SI 2017 No. 168 (W. 49)

Civil Contingencies Act 2004

The FRS is classed as a Category 1 responder under the Act which requires them, through local and regional resilience forums where appropriate, to work in co-operation with other emergency services and agencies to ensure an effective response to a full range of emergencies, from localised incidents through to catastrophic emergencies. This Act imposes a range of duties on local resilience forums that include: to have information sharing mechanisms in place between responders; to develop and implement business continuity plans; to produce and publish emergency plans as appropriate; and to agree arrangements for public awareness and information provision.

The Crime and Disorder Act 1998

This Act categorises each Fire and Rescue Authority as 'responsible authorities' who are members of Community Safety Partnerships.

Through the partnerships these organisations collaborate on the development and implementation of community safety strategies to reduce crime and disorder, including anti-social and other behaviour adversely affecting the local environment.

The Equalities Act 2010 (Statutory Duties) (Wales) Regulations 2011

The Act aims to ensure that public authorities and those carrying out a public function consider how they can positively contribute to a fairer society in their day-to-day activities, through paying due regard to eliminating unlawful discrimination, advancing equality of opportunity and fostering good relations.

The Regulations place duties on the devolved public sector covering equality impact assessments, publishing and reviewing Strategic Equality Plans, engagement, pay differences, procurement, reporting arrangements and equality and employment information.

Welsh Language Act

The Welsh Language Act 1993 has had a significant impact on the way that public and Crown bodies provide services to the public in Wales. Since 1993 NWFRS has had a duty to prepare a Welsh Language Scheme which explains in detail how it treats both the English and Welsh languages on the basis of equality. This has included working to ensure that it has the necessary skills and ability to offer a genuine language choice when dealing with the public.

NWFRS is now subject to enhanced Welsh Language legislation. The Welsh Language Measure was given Royal Assent in early 2011. This new law confirms the official status of Welsh in Wales alongside the English language. As well as introducing a number of Welsh language 'Standards' it also created the role of a Welsh Language Commissioner with strong enforcement powers to protect the rights of Welsh speakers to access services through the medium of Welsh.

Response Standards

Following the removal of nationally prescribed response standards the three Fire and Rescue Authorities in Wales have a common aim of maintaining a long term downward trend in the incidence of:

- a) dwelling fires;
- b) dwelling fire casualties; and
- c) serious injury to fire personnel attending dwelling fires

The high level commitments to achieve these are set out in the All-Wales Dwelling Fire Response Charter with NWFRS setting its own local emergency response standards, reflecting both the changing nature of risk at differing times of the day as well as the challenges faced in the recruitment and retention of Retained Duty System (RDS), on-call, firefighters. These local response standards take account of the proactive (education, protection and support) and the reactive (emergency response) service delivery.

The current resourcing strategy ensures that there are a minimum of 20 appliances, strategically located, available at times of relatively lower risk with a minimum of 38 appliances at times of relatively higher risk.

Local Resource Issues

As previously identified (above), NWFRS, like other FRSs in the UK, faces challenges around not only finances but also in recruiting and retaining Retained Duty System (RDS) firefighting personnel.

NWFRS resources on the Isle of Anglesey are located at seven stations, only one of which has whole-time firefighters working the Day Crewed duty system. The current disposition of crews and assets includes:

- Holyhead Fire Station: two watches of 7 (14) working four on/four off with an RDS complement of 11 personnel. Two fire appliances, an Environmental Protection Unit (EPU) and a Technical Rescue Unit (TRU).
- Amlwch Fire Station: 9 personnel working the RDS system. One fire appliance and one dual role appliance.
- Beaumaris Fire Station: 6 personnel working the RDS system. One fire appliance.
- Benllech Fire Station: 13 personnel working the RDS system. One fire appliance.
- Llangefni Fire Station: 8 personnel working the RDS system. One fire appliance and one dual role appliance.
- Menai Bridge Fire Station: 10 personnel working the RDS system. One fire appliance.
- Rhosneigr Fire Station: 8 personnel working the RDS system. One fire appliance.

The two next nearest stations are located on the mainland at Bangor and Caernarfon.

- Bangor Fire Station: Two watches of 7 (14) working four on/four off with an RDS complement of 15 personnel. Two fire appliances, an Aerial Ladder Platform (ALP), an Incident Response Unit (IRU) and a Water Rescue Unit (WRU).
- Caernarfon Fire Station: Two watches of 7 (14) working four on/four off with an RDS complement of 15 personnel. Two fire appliances, a High Volume Pump (HVP) and a Foam/Water Carrier (FOC).

The above assets are used as part of NWFRS's pre-determined attendance (PDA) to any incident at the existing Wylfa Decommissioning Site. The whole Wylfa Newydd development, including the off-site developments, would have an impact on the resources available on Anglesey.

The WNDA and associated sites will become part of the risk profile for the nearest fire stations.

Table 2 – Six year average incident data with projected increase based on population increase due to construction workers for Wylfa Newydd

Financial Year / Area	Rate of Incidents per 10,000 population (based on 2017 population estimates)				Estimate Number of Incidents (based on 2017 population estimates PLUS non-home-based numbers)				Number of Incidents, and Rate Difference			
					- Extrapolated from actual Rate of Incidents -							
2011/12 - 2016/17 Average	Fires	False Alarms	Special Services RTCs	Special Service Other than RTCs	Fires	False Alarms	Special Services RTCs	Special Service Other than RTCs	Fires	False Alarms	Special Services	Special Service Other than RTCs
Anglesey North	47	35	8	34	64.42	47.97	10.96	46.60	17.42	12.97	2.96	12.60
Population of Area	13,557	13,557	13,557	13,557	18,581	18,581	18,581	18,581				
Rate of incidents per 10,000 populatio	34.67	25.82	5.90	25.08	34.67	25.82	5.90	25.08	0.00	0.00	0.00	0.00
Anglesey West	104	127	9	24	107.72	131.54	9.32	24.86	3.72	4.54	0.32	0.86
Population of Area	24,962	24,962	24,962	24,962	25,854	25,854	25,854	25,854				
Rate of incidents per 10,000 populatio	41.66	50.88	3.61	9.61	41.66	50.88	3.61	9.61	0.00	0.00	0.00	0.00
Anglesey South	79	116	13	20	80.60	118.35	13.26	20.41	1.60	2.35	0.26	0.41
Population of Area	31,204	31,204	31,204	31,204	31,837	31,837	31,837	31,837				
Rate of incidents per 10,000 populatio	25.32	37.17	4.17	6.41	25.32	37.17	4.17	6.41	0.00	0.00	0.00	0.00
Menai Mainland	267	397	25	65	268.83	399.72	25.17	65.45	1.83	2.72	0.17	0.45
Population of Area	65,843	65,843	65,843	65,843	66,294	66,294	66,294	66,294				
Rate of incidents per 10,000 populatio	40.55	60.29	3.80	9.87	40.55	60.29	3.80	9.87	0.00	0.00	0.00	0.00

3. Identified Impacts on North Wales Fire and Rescue Service and the Local Community

Impact No.1: Potential increase in Retained attendance times to stations
<p>Impact Assessment</p> <p>Of the forty-four fire stations in North Wales, thirty-six are Retained Duty System (RDS), five are Wholetime Day Crewed with RDS complement and three are Wholetime Shift (24-hour) with RDS complement. Of the seven fire stations on Anglesey, six are RDS and one is Day Crewed. RDS firefighters respond to their station when alerted to calls. They have no dispensation from road traffic regulations and must proceed to their station under normal driving conditions.</p> <p>The accommodation strategy for construction workers identifies, through gravity models, areas where it is likely that workers will reside. The areas highlighted are also those where NWFRS RDS stations are located.</p> <p>NWFRS has concerns that the increased traffic associated with the development will have a detrimental effect on the ability of personnel to be able to respond to their stations within the appropriate time i.e. within 5 minutes of being alerted. If the nominated first fire appliance has not turned out within this time it is service policy to alert the next nearest fire station, with associated response time and financial impacts – i.e. with increased risk to the public due to delayed turnout and additional financial burden on the public purse.</p> <p>Apart from appliances failing to turn out, or to be significantly delayed, there is also a reputational impact to be considered, especially in the investigatory aftermath of an incident that has had an adverse outcome where questions would normally be raised about the time that it took to respond and the cause of any delay.</p> <p>As previously stated, recruiting and retaining RDS firefighters is challenging. It should be noted that during day time hours there are some employers whose staff are also retained firefighters who will permit those members of staff to respond from their primary work to attend emergency incidents, so helping to maintain availability of a complete RDS crew. However, this cannot be assumed in all cases, and is not common to all NWFRS stations.</p> <p>There is a link between this impact and Impact 2 (Increased attendance/response times) and Impact 8 (Displacement of staff). The potential for fewer staff being available would result in the need to mobilise appliances from further afield thereby increasing response times, and risking even greater delay closer to the development site because of the presence of construction traffic.</p>
<p>Adequacy of HNP mitigation proposals</p> <p>The documentation submitted by Horizon identifies that it proposes to provide transport for construction workers to travel to the site from their residence or, by encouraging car sharing construction workers can either use the park and ride facility or park at the site.</p> <p>Horizon has undertaken a Traffic Assessment of the A5025 from Valley to the WNDA and has proposed a Traffic Incident Management Plan (TIMP). Although an assessment of the A5025 from WNDA east has been provided, Horizon has not proposed any mitigation.</p>
<p>Mitigation proposed by NWFRS</p> <p>NWFRS considers that it may be necessary to have a resource available in an area close to the WNDA which can respond in a timely manner to both the local community and to WNDA.</p> <p>The most appropriate means of securing this would be by providing a 24-hour fire station, but this would mean a significant financial impact on the Service and would necessarily be subject first to an extensive piece of work to clarify the exact requirements (meeting both community needs and expectations for site incidents) and fully cost the proposal.</p>

Impact No.2 : Potential increase in attendance/response times to emergency calls

Impact Assessment

NWFRS has concerns that the additional traffic associated with the development will potentially have an adverse influence on attendance/response times of appliances responding to emergency calls. This will impact the A5025 in either direction of the WNDA however it will be most evident on the A5025 between Valley and the WNDA due to the constant flow of HGVs.

The communities along the A5025, or served via the A5025, between Valley and Amlwch are normally covered by fire stations at either Holyhead or Amlwch. Responding appliances from either station would have to negotiate Wylfa Newydd construction and/or contractor traffic in order to attend incidents in these areas.

NWFRS notes that Horizon has notified the Examining Authority (ExA) that it intends to submit what it considers to be a Non-material Change to the hours of HGV movements to and from the site. This will increase the time window where delays may be encountered in responding to either the communities along the A5025, especially between Valley and Amlwch, or to an incident on site.

Adequacy of HNP mitigation proposals

It is noted that the developer has been granted planning permission for on-line improvement works to the A5025 between Valley and the WNDA, and is seeking, as part of the DCO approval, for off-line improvements. This, the developer suggests, will improve road safety and provide increased opportunities for overtaking. NWFRS notes, however, that there will be HGV movements in both directions along the A5025 in addition to existing traffic, and therefore does not consider that this will actually improve overtaking opportunities.

Additionally, Horizon is proposing that the use of the TIMP and managing the release of vehicles from the logistics centre, Parc Cybi, will avoid the formation of convoys to the site, or from the site back to the A55 once they have completed their deliveries.

Whilst the TIMP is intended to manage construction traffic in the event of a traffic-related incident, or may be utilised should there a site-related incident, it will not ensure a clear run for fire appliances in the event of a response is required to communities.

Mitigation proposed by NWFRS

As identified in Impact No.1 NWFRS considers that it may be necessary to have a resource in an area close to the WNDA which can respond, in a timely manner, to both the local community and to the WNDA.

The most appropriate means of securing this would be by providing a 24-hour fire station, but this would mean a significant financial impact on the Service and would necessarily be subject first to an extensive piece of work to clarify the exact requirements (meeting both community needs and expectations for site incidents) and fully cost the proposal.

Impact No.3 : Potential increase in the number of Road Traffic Collisions (RTC)

Impact Assessment

A development on the scale of Wylfa Newydd will inevitably increase the number of vehicles on the roads leading to the development area. Furthermore, given the numbers of vehicles involved this is expected to lead to a change in the commuting patterns and daily travel plans of local residents, using alternative routes to avoid congestion.

It is inevitable that the increase in traffic will lead to an increase in the number of RTCs which NWFRS will have to respond to. Horizon's application documentation indicates that there will be an increase in the number of cars, HGVs and buses on the road network associated with the development.

Horizon's assessments indicate that at peak there will be 40 HGVs per hour travelling to and from the WNDA, which is a considerable increase on the existing situation. RTCs involving large vehicles can result in complex, and at times lengthy, extrications which will have resource and cost implications on the service.

NWFRS note that the impact of construction related traffic will not be confined to the Wylfa Newydd Power Station but will also include National Grid's North Wales Connection project (directly linked to Wylfa Newydd), Welsh Water Wylfa Potable Water Scheme as well as other potential developments.

In analysing the potential increase in the number of RTC's that NWFRS may have to attend, NWFRS has reviewed its own incident data for the 6 year period 2011/12 – 2016/17 and the Traffic and Transport Assessments undertaken by Horizon.

Whilst the extrapolation of data does show an increase it does not take account of the types of vehicles which may be involved. Given the increase in numbers of HGVs and buses moving staff between WNDA and the park and ride, any incident involving large vehicles will undoubtedly be more serious with consequent impact on NWFRS resources.

Adequacy of HNP mitigation proposals

Horizon has undertaken a Traffic Assessment of key roads, however this is primarily concerned with the A55 from Junction 11 up to Junction 2 (Parc Cybi) and the A5025 from Valley up to WNDA.

Construction traffic and construction workers travelling to the site, other than home-based workers, may be travelling long distances and, if involved in RTC's on the wider road network will have an impact on NWFRS, as well as other agencies, in an area wider than the one that has been assessed.

The documents identify that proposed improvements along the A5025 between Valley and WNDA will provide a legacy benefit, with the road meeting current standards and increased opportunities for overtaking.

The application documentation sets out Horizon's Integrated Travel and Transport Strategy (ITTS) which covers both construction worker travel and construction traffic.

Horizon proposes a Traffic Incident Management Plan (TIMP) which is to be implemented through its supply chain to manage construction traffic movements in the event of an incident on the road network. It is noted that the CoCP is light on detail with regards to the TIMP and that the final version will need to be agreed with all parties.

The application documentation indicates that in relation to construction traffic deliveries to the site will be managed via the logistics centre, using an integrated Distribution Management Asset Tracking System (DMATS), with vehicles being held there until their allotted time slot to proceed to the site. Once they have completed their delivery they will then be released to return along the A5025 to the A55 at Valley before returning to their original location. As with the TIMP there is little detail on the DMATS and it is that this is the basis of a Construction Traffic Management Plan (CTMP) which will need to be agreed by all stakeholders.

It is noted that although construction workers will be expected to adhere to codes of conduct the developer will have no control over construction staff either commuting on a daily basis or travelling

to/from Anglesey at the start/end of their 11 day shift. . There is the potential for these individuals to be involved in RTC's during such journeys.

Mitigation proposed by NWFRS

NWFRS has duties relating to responding to RTCs when called but is also committed (in the best interests of the community as a whole) to reducing the frequency and seriousness of such incidents. This involves educating members of the community about the risks and the five contributory factors associated with RTCs. NWFRS considers that a programme of proactive prevention engagement, involving all construction workers and the community, would have a positive effect on road safety.

Following a review of specialist appliance distribution, NWFRS relocated a Technical Rescue Unit (TRU) to Holyhead fire station to provide strategic cover to both the A5025, Valley to WNDA, and the A55. This has entailed a cost implication for the Service due to the training required for the personnel located at Holyhead in the use of the specialist equipment carried on the appliance.

Impact No.4 : Potential for increase in incidents as a result of the construction of Wylfa Newydd

Impact Assessment

NWFRS has identified that a development on the scale of Wylfa Newydd and the construction workforce required will inevitably lead to an increase in the number of incidents it will have to attend during the construction phase. To understand the potential increase in numbers of actual fires and of false alarms generated by automatic fire alarms (AFAs), NWFRS has analysed existing incident data.

This analysis has considered:

- incident data for the 6-year period April 2011 to March 2017 considered in the key socio-economic area (KSA) as identified by Horizon i.e. Anglesey North, Anglesey West, Anglesey South and Menai Mainland;
- KSA population based on 2017 population estimates;
- the increase in the population, as a result of the development, as identified in Workforce Accommodation Strategy (8.4) (WAS).

Horizon's Workforce Accommodation Strategy identifies some key locations where it is anticipated that non-home based workers are expected to seek accommodation i.e. the larger centres of population in the KSA. An estimate for the increase in the number of incidents can only be based on a simple extrapolation of existing data.

The KSA has a population of approximately 135,566, with the Fire and Rescue Service attending an average of 1,370 incidents per annum.

The WAS is predicated on 3,000 workers residing within the KSA in private rental, tourist or latent accommodation, with up to 4,000 accommodated in campus style accommodation blocks on site. The site campus, if fully realised, will be the third largest centre of population on the Isle of Anglesey. An extrapolation of the current incident data against the increased population profile suggests an estimated 1,436 incidents per annum which the FRS will be required to attend.

The assessment undertaken considered the KSA in its constituent parts i.e. Anglesey North, Anglesey West, Anglesey South and Menai Mainland. Given the anticipated increase in population per area it is not surprising that the impact will be felt the greatest in Anglesey North. It should be noted that NWFRS is unable to identify the potential increased demand being placed on it as a result of having to respond to incidents at the WNDA.

This assessment considers the impacts and mitigation required during the construction of Wylfa Newydd. Once constructed and in operation there will be a continued requirement to have contingency plans in place for dealing with emergency incidents, which may not involve a Nuclear Emergency. NWFRS would expect Horizon to have in place developed and tested emergency arrangements, not solely reliant on NWFRS, prior to commissioning of the station.

Adequacy of HNP mitigation proposals

Horizon, through its Project Management Contractor (PMC) Bechtel, is proposing to have a Fire and Rescue Service on site. At the time of writing NWFRS has had sight of a Scope of Service document and, based on the information provided and initial discussions, does not believe that this will be a stand-alone provision on the site i.e. there will be a requirement for NWFRS to respond in support of, or to ultimately deal with, incidents.

The Scope of Service document identifies that there will be a requirement for both Rope Access and Confined Space capability on site, further compartment fire capability including searching smoke filled compartments is required. NWFRS believes that given the proposed staffing numbers there will be a requirement for NWFRS to attend incidents on site which will have both a resourcing and financial impact on the Service.

Whilst NWFRS is satisfied with the content of the Scope of Service document it will only be possible to fully assess the adequacy of the provision and thus demand on NWFRS once potential providers

can provide detail as to what the service provision will be.

NWFRS understands that in the event of an incident on site work activities would be suspended pending resolution of the incident. It is anticipated that any emergency response required to either the logistic park (Parc Cybi), the park and ride (Dalar Hir) or the Off-Site Associated Developments (MEEG/AECC/DSL) will be undertaken by NWFRS.

Mitigation proposed by NWFRS

As identified above NWFRS considers that it may be necessary to have a resource available in an area close to the WNDA which can respond, in a timely manner, to both the local community and to WNDA.

The most appropriate means of securing this would be by providing a 24-hour fire station, but this would mean a significant financial impact on the Service and would necessarily be subject first to an extensive piece of work to clarify the exact requirements (meeting both community needs and expectations for site incidents) and fully cost the proposal.

Impact No.5 : Additional risks which may require mitigation

Impact Assessment

The proposed Marine Off-Loading Facility (MOLF) will provide facilities to enable Horizon to meet its commitment to deliver a minimum of 60% of construction materials by sea thus reducing the impact on the road network. Over the course of the development this will see a large number of vessels being utilised, some for the construction of the MOLF, with the majority using the MOLF during construction of the Power station. While the proposal is welcome in reducing traffic numbers it is introducing additional risks, up to eight vessels per day, and which will require local fire stations to be developed in the necessary skills for dealing with an incident aboard vessels.

It is reasonable to foresee that the addition of the MOLF and the risks of a fire on-board a vessel present risks for which those personnel who will be expected to respond to such incidents will need to be adequately trained and have the appropriate skills.

It is noted that an incident aboard a vessel in the MOLF could have serious consequences in terms of risks to personnel, risks to the environment and potentially cause delays in the build programme of Wylfa Newydd. NWFRS does not have the capability for dealing with an incident involving a vessel out at sea, and any incident alongside could have resource implications for the Service.

Adequacy of HNP mitigation proposals

A review of the DCO application documents does make reference to incidents involving vessels alongside, however this is primarily concerned with vessels either losing power or coming into contact with the proposed breakwaters. The documentation does make reference to emergency equipment being provided for the use of the emergency services but it is not specified what the equipment is, what it will be used for or who will be trained to use it.

Horizon's documentation does not consider the impact of a fire on-board a vessel alongside or how it would be dealt with.

Mitigation proposed by NWFRS

NWFRS would propose that Horizon either makes suitable arrangements to secure resources to deal with an incident on board a vessel alongside without the need to request assistance from the Service or to make a contribution, via a section 106 agreement, for the development of a cadre of NWFRS personnel (including managers) with the necessary skills and knowledge for dealing with such incidents. Any such training should be delivered through an accredited training centre. In addition to the provision of training, an assessment will be required of the equipment the developer proposes to provide and what NWFRS considers is required for the risk - a financial provision must be made for any reasonably required equipment.

Impact No.6 : Increased workload relating to Community Safety and Business Fire Safety

Impact Assessment

NWFRS anticipates that both its Community Safety and Business Fire Safety activities will increase significantly during the build period of Wylfa Newydd. NWFRS considers that whilst the focus of the impact may be local to the Wylfa Newydd Development Area (WNDA), the development will have an impact on the whole of Anglesey and beyond given that construction workers and materials will have to travel through North Wales to get to the site.

As identified elsewhere in this document Horizon's application is predicated on a workforce of 8,500 (up to 9,000) with 2,000 being home based, 3,000 in the PRS/tourist/latent accommodation and up to 4,000 in an on-site campus.

The on-site campus is proposed to be provided in three phases with an initial 1,000 bed spaces in phase 1, phase 2 to be the addition of 1,500 further bed spaces with phase 3 realising the total of 4,000.

At the time of writing NWFRS understands that Horizon will cap the number in the PRS/tourist/latent accommodation at 3,000.

Given the workforce requirements of the site, and in considering the demands on the construction industry within the UK, it is foreseeable that there is likely to be a need to employ construction workers from outside of the UK on this project. It is NWFRS's experience when engaging with migrant workers that some of their cultural practices present increased risks of fire to themselves and those around them.

Some of the accommodation being proposed has the potential to have an impact on local resources from both an operational response perspective and on a legislative basis.

Community Safety

NWFRS has identified (see Impact 3 above) that there is likely to be a marked increase in areas concerning road safety and traffic. This relates to the strategic road network across Anglesey (A55), the A5025 between Valley and the proposed Wylfa Newydd, the A5025 to the east of Wylfa and the minor roads from various part of the island to the site. This concern is not only related to construction related traffic (including commuting) but also how this will impact and change the nature of non-Wylfa related travel by the residents of the island.

Impact 4 identifies that there will be an anticipated increase in incidents as a result of the population increase resulting from construction workers taking up accommodation within the KSA. Horizon has used gravity models to anticipate the potential likely areas for the uptake of accommodation, NWFRS have assessed the increase based on 4000, in the on-site campus, located in Anglesey North with 3000 as identified in the remaining KSA.

In relation to Community Safety activity NWFRS works with other key stakeholders to provide advice, signpost access to other services or support not provided by NWFRS and where required to fit smoke detectors. The Service prioritises the most vulnerable, key target groups having been identified following a Chief Fire Officer's Task Group 'Report into Accidental Dwelling Fire Deaths' published in 2007 and a subsequent review undertaken in 2009, however Safe and Well Checks are provided for all on request.

NWFRS is concerned that the potential opportunities being offered by the development may lead to vulnerable individuals in private rented accommodation being displaced to make way for construction workers, and consequently being exploited by rogue landlords letting accommodation of a poor standard.

NWFRS currently has an Arson Reduction Team (ART) which works in conjunction with the police, local authorities and other stakeholders to tackle issues relating to arson, whether due to anti-social

behaviour or targeted deliberate fire setting. Given the scale of the development it is expected that engagement between ART and stakeholders including Horizon will be necessary to reduce the potential of arson or to tackle issues should they arise.

Business Fire Safety (BFS)

Engagement with BFS will commence when detailed plans of the site campus, as well as other developments (buildings at Dalar Hir, Parc Cybi, etc.) will require Building Regulations approval either through the Local Authority Building Control or the Approved Inspector process. This is likely to require consultations, meetings and site inspections.

The proposed site campus will be subject to the Regulatory Reform (Fire Safety) Order 2005 (RRO), as do all premises other than single domestic dwellings. As identified above NWFRS is the enforcing authority for the legislation with an auditing strategy based on risk. Although peak workforce is expected to be between 8,500 – 9,000, it is understood that the churn for the whole construction period will be approximately 45,000. Given the potential turnover of workers using the site campus it is anticipated that NWFRS will need to audit the site on a six-monthly basis, however this would also depend on the management of the campus and on incident statistics.

As stated above other accommodation used by construction staff will also be subject to the requirements of the RRO, with a need to undertake audit and where necessary investigate areas of non-compliance with legislation.

Adequacy of HNP mitigation proposals

Horizon is proposing to have a Community Safety Management Strategy (CSMS) with the main area of focus in a 2.5km radius of the site. Very little detail regarding the CSMS has been shared with key stakeholders and consequently at the time of writing NWFRS is not able to provide comment on its adequacy in relation to community safety issues.

The approach to road safety appears to be through the application of Workforce Management Strategy and the Code of Construction Practice with information being disseminated by means of internal media e.g. App or internet.

NWFRS is of the view that the provision of Temporary Worker Accommodation will contribute to ensuring that the impact of construction workers on the community will be mitigated although the timing of the delivery of the campus will play a key role.

Horizon is proposing to have a Worker Accommodation Managements Service (WAMS) which is intended to have a register of available accommodation, which meets relevant safety standards as applicable in Wales, through which it will match construction staff to suitable accommodation. NWFRS understands that the service is intended to ensure that there is not a disproportionate number of construction staff in one area which could impact upon the local community.

Furthermore, Horizon proposes that the proposed Code of Construction Practice will be the mechanism to ensure that construction staff adhere to acceptable behavioural standards including being safe from fire.

Horizon recognises that displacement of vulnerable individuals is possible however proposed mitigation is based on monitoring and reacting when issues become evident.

The DRAFT Wylfa Newydd Fire & Rescue Scope of Services which has been shared with NWFRS by Bechtel identifies that the service will deliver fire prevention training and surveillance ensuring work areas are compliant with UK legislation, perform fire safety education campaigns both on and off site and provide certified fire extinguisher training.

Mitigation proposed by NWFRS

In relation to Community Safety, NWFRS would seek to have funding for a Community Safety Officer whose role would be to work with the communities impacted by the development to deliver prevention and education. This would include engagement with construction staff living at either site

campus or in the community to reduce the risk of unwanted fires and their devastating consequences.

NWFRS is of the opinion that in order to mitigate the impact of construction workers on the communities and to avoid the potential displacement of vulnerable citizens that the on-site campus should be developed in its entirety as early as possible once construction commences and that full occupancy should be the aim as soon as would be practicably possible.

NWFRS believes that it is essential that Horizon identifies the anticipated migrant population, which would allow stakeholders and the developer, to ensure that strategies can be agreed to ensure that adequate engagement takes place.

Additionally there would be the potential to deliver road safety education to construction staff and locals. This would benefit young drivers especially given the marked increase in road traffic and the potential for the use of back roads as rat runs to avoid congestion. Delivery of road safety initiative would be multi agency and funding over and above that for a Community Safety Officer would be required.

In relation to Business Fire Safety the work demand associated with the development, including use of non-site accommodation is such that it will justify a full time member of staff who is suitably qualified and competent to address building regulations applications, undertake audits and where appropriate issue prohibition and enforcement notices.

Impact No.7 : Risk Planning and Liaison

Impact Assessment

During the pre-application and DCO application phase Horizon has entered a Planning Partnership Agreement with NWFRS, which has enabled a dedicated Fire Service Manager to review, assess and respond to consultations as well as engagement with both the developer and key stakeholders.

It is anticipated that should the DCO be granted, the developer will commence work on the site. The works to be consented through DCO, and those consented through Town and Country Planning Act (TCPA), will have an impact not only at the WNDA but also on a large part of Anglesey and beyond.

The scale of the development and the works required will see changes over a large area, some of which will change the landscape, and happen over a relatively short time period. Whilst it is anticipated that some response plans will be developed ahead of work commencing regular reviews, including for changes in the works, will be required to ensure that the plans are fit for purpose and are in a format which meet the needs of all agencies. In addition to the work associated with construction there will be a need to engage in the work associated with the development and testing of Emergency Preparedness plans in meeting the needs of the REPPIR regulations.

In addition to the work associated with response plans, there are proposals for key stakeholders to be represented on Governance boards covering a range of topic areas. In addition to this there will be a need to engage in the proposed Community Safety Management Strategy (CSMS) and it is anticipated that NWFRS will have to utilise its staff to assist in delivering the safety messages to the community.

To ensure suitable and sufficient plans are in place it will be necessary for operational crews, who are likely to attend incidents at the site, to be familiar with the site layout to include access points, RVPs, high risk areas etc. This requirement can only be met by ensuring crews have the opportunity to visit the site on a regular basis and that this will also foster good working relationships between the site FRS and NWFRS personnel.

Adequacy of HNP mitigation proposals

In the Scope of Service document it is proposed that the site Fire and Rescue Service will contribute to the development of emergency response plans as well as organising and facilitating on and off site emergency drill with key stakeholders.

Given the breadth of documents associated with the DCO documentation NWFRS is unable to specifically identify all the proposed mitigations.

Mitigation proposed by NWFRS

It is NWFRS's understanding that during the current construction of Hinkley C power station that Devon and Somerset Fire and Rescue Service has an Emergency Services Liaison Officer, costs covered by EDF, working on the project for them.

NWFRS proposes that a similar arrangement be entered into between the Service and Horizon, in order that a suitably qualified and experienced manager can undertake such a role. NWFRS believes that the need for a Liaison Officer is essential and that the engagement required is to be agreed, with a review on an annual basis by all parties to ensure that needs are being serviced adequately.

In relation to site visits NWFRS proposes that during initial ground works and the development of the MOLF a minimum of three site visits are undertaken per 12 months and that on the commencement of the main construction this is revised to a minimum of 10 per 12 months. This to be regularly reviewed and where appropriate if additional visits are required, due to changing risks, this to be agreed between the parties.

NWFRS proposes that an annual bond be secured against which payment for the risk visits can be drawn down on a cost recovery basis.

NWFRS recognises the benefits of regular exercises but where these are to be arranged there will be a need for NWFRS and HNP to agree the costs prior to the exercise.

Impact No.8 : Displacement of staff to Wylfa Newydd

Impact Assessment

NWFRS recognises that a development on the scale of Wylfa Newydd will provide opportunities for employment which will potentially be at rates of pay above that available in the local economy. This may lead to staff seeking employment either at Wylfa Newydd or potentially with an employer in the supply chain.

NWFRS provision on Anglesey is predominantly RDS with some personnel being able to provide cover from their place of work, with their employer's consent, and others being available either as they are self-employed or shift workers on days off. NWFRS is concerned that these staff members may find alternative employment at Wylfa Newydd and may not wish to, or be available to, continue providing the RDS cover.

This is also a concern from the perspective of the proposed Wylfa Newydd FRS which could see RDS personnel being employed as firefighters at Wylfa Newydd – working shifts – and not being available at their local fire station for NWFRS.

As identified above recruitment and retention of personnel is an on-going challenge for NWFRS and any loss of staff has a resource and cost impact on the organisation.

Adequacy of HNP mitigation proposals

HNP is proposing a Jobs and Skills Strategy which will include establishing the Wylfa Newydd Employment and Skills Service (WNESS) – the process by which vacancies in the economy as a result of Wylfa Newydd can be filled. It has been suggested that this could be a means of tackling any recruitment issues in the FRS.

NWFRS understands that in relation to the proposed Wylfa Newydd FRS that the PMC Bechtel does not intend to detrimentally impact NWFRS by employing its personnel on site, but despite this it is also clear that its selection processes cannot discriminate against local people with the requisite skills.

Horizon has indicated that some of its construction staff may wish to undertake the role of RDS firefighters but NWFRS would have to assess each application on its merits and the individual's availability to provide cover. This would have a significant cost impact on NWFRS with regards to developing an individual to be a firefighter with all the requisite skills.

Mitigation proposed by NWFRS

As identified above NWFRS considers that it may be necessary to have a resource available in an area close to the WNDA which can respond, in a timely manner, to both the local community and to WNDA.

The most appropriate means of securing this would be by providing a 24-hour fire station, but this would mean a significant financial impact on the Service and would necessarily be subject first to an extensive piece of work to clarify the exact requirements (meeting both community needs and expectations for site incidents) and fully cost the proposal.

4. Related Requirements (Conditions)

1. NWFRS requires that a Traffic Incident Management Plan (TIMP) is agreed with the Local Authority and emergency services prior to the commencement of the main works.
2. NWFRS requires that the Construction Traffic Management Strategy (CTMS) which will include the Distribution Management Asset Tracking System (DMATS) is agreed with the Local Authority and emergency services prior to the commencement of the main works.
3. NWFRS requires that the Community Safety Management Strategy (CSMS) is agreed with the Local Authority, the emergency service and other stakeholders.