

**From:** [Geraint Hughes \(Siaradwr Cymraeg\)](#)  
**To:** [Wylfa Newydd](#)  
**Subject:** Comments on Responses to ExA First Written Questions  
**Date:** 17 December 2018 23:43:21  
**Attachments:** [NWFRS Comments on Responses to First Written Questions.docx](#)

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Good evening,

Please find attached comments, submitted on behalf of North Wales Fire and Rescue Service, to responses to the Examining Authority's First Written Questions.

Kind 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 fydddech 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, rhygipio, 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.

**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 cydymffurfiad â'n polisiau.

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

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# North Wales Fire & Rescue Service

## Comments on Responses to Examining Authority's First Written Questions

Wylfa Newydd Nuclear Power Station Project

PINs Reference: EN010007

NWFRS Examination Reference: 20011615

ExQ1	Question	Responder & Response – NWFRS Comments
<b>Q10.1.19</b>	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><b>Applicant</b></p> <p>Although the suitability of accommodation has not been part of the pre-DCO assessment, the intention is that the Workforce Accommodation Management Service (WAMS) will be a tool used to ensure that properties are suitable and safe for workers to use.</p> <p>In order to offer property through the WAMS, landlords will need to demonstrate that their property is safe for anyone to live in and has the necessary licenses and safety certificates (eg gas safety). This will include being registered with Rent Smart Wales in the case of Private Rented Sector landlords.</p> <p>Horizon has also offered annual funding in the Draft DCO s.106 agreement to support IACC with the potential for increased licensing and enforcement work.</p> <p>The WAMS will also help to match workers with accommodation that best meets their needs in terms of location, facilities, cost and length of stay.</p> <p><b>NWFRS comment</b></p> <p>It is noted and commended that the Applicant has offered annual funding in the Draft DCO s.106 agreement to support IACC with potential increase in licensing and enforcement work however no provision has been identified for the potential impact that this will have on auditing and enforcement work under the Regulatory Reform (Fire Safety) Order 2005 (RRO) on NWFRS.</p>
<b>Q10.3.4</b>	The Emergency Services have concerns regarding the pressure that could be placed on the services they provide and the potential loss of experienced/skilled staff to the project. How would this be addressed?	<p><b>Applicant</b></p> <p>Horizon are committed to working with the emergency services during the construction and operation of the Wylfa Newydd development. Horizon is working with the Welsh Government and members of Team Wales through the Statement of Common Ground process in respect of this topic (including training and service provision). Mitigation in this respect will be included in the Draft DCO s.106 Agreement as it develops.</p> <p>The Draft DCO s.106 provides that WNESS will assist in the recruitment of new employees to the labour market; train and upskill both new entrants and others; and provide a brokerage service by filling vacant posts to support businesses which</p>

		<p>encounter difficulty finding appropriate replacements when workers move on to the Wylfa Newydd DCO Project. Through the WNESS, Horizon will seek to (among other matters) support any employers who lose employees to the Wylfa Newydd Project to backfill their roles.</p> <p>A Jobs and Skills Implementation Plan is being agreed with stakeholders and will be attached to the Draft DCO s.106. The Jobs and Skills Implementation Plan will (among other matters) require monitoring of labour displacement</p> <p>Finally, a Skills Fund is proposed in the Draft DCO s.106 to fund employment and training initiatives.</p> <p><b>NWFRS comment</b> Please see NWFRS comments on Applicants response to Q10.6.11 below.</p>
<b>Q10.6.11</b>	<p>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>	<p><b>Applicant</b></p> <p>Horizon are committed to working with the emergency services during the construction and operation of the Wylfa Newydd development. Horizon is working with North Wales Fire and Rescue Service through the Statement of Common Ground process in respect of this topic (including training and service provision). Mitigation in this respect will be included in the Draft DCO s.106 Agreement as it develops.</p> <p>Horizon acknowledges that some people may choose to move from other sectors to work on the Wylfa Newydd DCO Project and intends to support backfilling of any vacancies through Wylfa DCO Newydd Employment and Skills Service (WNESS). The Draft DCO s.106 provides that WNESS will:</p> <ul style="list-style-type: none"> <li>· will seek to (among other matters) support any employers who lose employees to the Wylfa Newydd DCO Project to backfill their roles</li> </ul> <p>A Jobs and Skills Implementation Plan is being agreed with stakeholders and will be attached to the Draft DCO s.106. The Jobs and Skills Implementation Plan will (among other matters) require monitoring of labour displacement.</p> <p>Finally, a Skills Fund is proposed in the Draft DCO s.106 to fund employment and training initiatives.</p> <p><b>NWFRS comment on Applicants response to Q10.3.4 &amp; Q10.6.11</b> NWFRS acknowledge that Horizon are proposing that the WNESS will assist backfilling</p>

	<p>roles lost due to employees taking up opportunities by the development and that the issue is within the SoCG discussions with NWFRS.</p> <p>The wider concern for the emergency services is the lead in times to ensure that new staff are suitably trained and qualified for the roles which they undertake.</p> <p>As identified in our response to Q10.6.11 operational fire cover on Ynys Môn is predominantly Retained Duty System (RDS) and the recruitment and retention of personnel is an ongoing challenge. There is a requirement for personnel to be able to respond to their station within five minutes of being alerted to an incident.</p> <p>NWFRS do not believe that the WNESS will be able to respond to the potential displacement of staff especially those in operational front line roles or with key skills.</p> <p><b>Land and Lakes (Anglesey) Limited (L&amp;L)</b></p> <p>The L&amp;L s106 secures Fire Services Contribution to contribute towards the cost of meeting additional demand on the fire service and mitigation against the impact on fire service capacity as a result of the increase in population arising from the Nuclear workers during their occupation of the development.</p> <p><b>NWFRS comment on Land and Lakes response</b></p> <p>The Impact Assessment (IA) undertaken by NWFRS for the s106 with L&amp;L identifies the costs relating to the engagement and work required in undertaking consultation, audit and potentially enforcement activities under the RRO during construction and occupation of the development when housing Nuclear construction workers. The IA identifies that the development would have an impact in relation to increased response activity and that a further assessment would be required once details of occupation and use were known.</p>
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