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**To:** [Wylfa@pins.gsi.gov.uk](mailto:Wylfa@pins.gsi.gov.uk)  
**Subject:** Deadline 7 Submission  
**Date:** 14 March 2019 21:55:45  
**Attachments:** [Cover Letter and Submission\\_DL7.pdf](#)

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Please find attached Post Hearing submission and response to Hearing Action Points arising from the draft DCO Hearing held on Wednesday 6<sup>th</sup> March. This submission is made on behalf of North Wales Fire and Rescue Service.

I would be grateful if you could confirm receipt of this email and the attachment.

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 siwr 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 ynglyn 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 fyddch 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, rhng-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 ynghyllch 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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Gwasanaeth Tân ac Achub  
Fire and Rescue Service

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GBH/DL7  
14<sup>th</sup> March 2019

By email to: [Wylfa@pins.gsi.gov.uk](mailto:Wylfa@pins.gsi.gov.uk)

Dear Madam

Response to Deadline 7

Please find enclosed the submission for Deadline 7 on behalf of North Wales Fire and Rescue Service which comprises of Post Hearing submission of the oral case presented at the Issue Specific Hearing on the draft Development Consent Order (DCO) and draft s106 Agreement on the 6<sup>th</sup> March 2019.

In addition a response is provided to Hearing Action Point 37 arising from the draft DCO hearing on the 6<sup>th</sup> March 2019.

Yours sincerely

Geraint Hughes  
Wylfa Newydd Project Manager

ATAL AMDDIFFYD YMATEB  
PREVENTING PROTECTING RESPONDING



Gwasanaeth Tân ac Achub  
Fire and Rescue Service

# North Wales Fire & Rescue Service

Wylfa Newydd Nuclear Power Station Project

PINs Reference: EN010007

NWFRS Examination Reference: 20011615

Deadline 7 Submission

## Post hearing submission of oral case

North Wales Fire and Rescue Service (NWFRS) was represented at the Issue Specific Hearing (ISH) by Assistant Chief Fire Officer Kevin Roberts and Group Manager Gwyn Jones.

NWFRS have submitted to Horizon Nuclear Power (HNP) their Mitigation Business Case which is based on a worst case scenario. Cognisance is made to the DRAFT Wylfa Newydd Fire and Rescue Scope of Service (WNFRS) which was shared with NWFRS and agreed with in principle subject to further detail being provided by the potential service provider.

NWFRS identified that the proposed WNFRS was intended to control major events until off-site assistance could arrive which given the proposed shift strengths and the need to operate in safe manner would inevitably require NWFRS to attend incidents.

In the absence of appropriate mitigation this would have a financial impact on NWFRS which would be felt across the service area and not confined to the Isle of Anglesey. Any detriment to NWFRS budgets would require it to seek additional funding from its six constituent authorities with the consequential impact on the public purse.

In relation to the Statement of Common Ground (SoCG) the position currently adopted by NWFRS, SoCG not endorsed by NWFRS, is due to the link between the areas not agreed and documents which are to be developed post Development Consent Order (DCO) and prior to construction.

NWFRS are in agreement with the proposed Emergency Services Engagement Group (ESEG) being established with NWFRS being a constituent member. It is imperative that the Constitution and Governance role of the ESEG is clear with the Emergency Services having meaningful input in the development of, and the approval process of future documents.

The documents, which must be developed with and agreed by the ESEG, must include the Community Safety Management Strategy (CSMS), Code of Construction Practice (CoCP) including sub-codes where appropriate, Traffic Incident Management Strategy (TIMS), Construction Traffic Management Plan (CTMP).

NWFRS are confident that an appropriately constituted ESEG with meaningful consultation/approval of relevant documents that its concerns would be alleviated and that it would be in a position to agree the SoCG.

## Post hearing note

NWFRS have a Level 2 meeting scheduled with HNP on the 21<sup>st</sup> March 2019 to discuss s106 agreement and the difference in quantum between NWFRS Mitigation Business Case and the sum allocated by HNP in the s106 agreement. NWFRS note that the sum allocated in the s106 was identified by HNP and no discussion has been had with NWFRS in identifying costs.

As identified at the hearing on the 6<sup>th</sup> March 2019 NWFRS Mitigation Business Case is predicated on a worst case scenario with the proposal for the WNFRS being in draft form. Given the current position of the development no further information has been provided with no possibility for NWFRS to engage with potential service provider to further review/develop HNP proposals.

NWFRS operational activity is undertaken in line with National Operational Guidance (NOG) with particular reference to Incident Command, Breathing Apparatus (BA) and Environmental Protection. The NOG documents identify safe systems of work which ultimately identifies the number of personnel required and given the current HNP proposals this would undoubtedly require NWFRS to attend incidents at the site. Whilst NOG documents are primarily focused towards local authority Fire and Rescue Services they should be considered as guidance and best practice by which both public and private bodies may be judged.

NWFRS are prepared to discuss its mitigation case with HNP to identify areas where the opportunity exists to make appropriate changes. Alternatives to the NWFRS proposals do exist however this must be viewed within the current challenges in the recruitment and retention of Retained Duty System (RDS) personnel and the requirement to reside/work in close proximity to NWFRS fire stations.

The majority of the required contribution identified within the Mitigation Business Case relates to the provision of operational fire cover however it has been identified that there will also be a demand in relation to Project Management/Liaison and Business Fire/Community Safety which themselves are greater than the sum allocated. There may be scope in reviewing the duration of impact on Business Fire/Community Safety it should be noted that the sum identified in the s106 is insufficient.

NWFRS are clear that in the event of it regularly being required to attend incidents at the site that the allocated sum within the s106 Agreement would be insufficient considering the demands of the project on the service. This could result in NWFRS having to request additional funding from its constituent authorities which would place further pressures on public services.

In relation to the s106 Agreement NWFRS do not agree with the conditions that HNP will direct where the allocated mitigation will be spent. NWFRS are of the opinion that the monies shall be secured with the stipulation that they are to be spent as a direct result of the impact of the Wylfa Newydd development. NWFRS are best placed to identify the impacts of the development and the demands placed upon the service and thus allocate financial resources appropriately.

NWFRS, as a public body, would ensure that it provided auditable accounts on an annual basis of the monies received and corresponding expenditure relating directly to that provided under the s106 agreement.

It is recognised that it may not be possible to agree all matters prior to the s106 agreement being finalised. NWFRS's priority is to serve the communities within its area with regards to Prevention, Protection and Response. The Draft WNFRS Scope of Service provides a basic outline of what is proposed and should this be realised it is inevitable that there would be a demand placed upon NWFRS resources.

NWFRS would propose that those areas not included in the s106 Agreement should be costed and be subject to review and negotiation when the project is reinvigorated. This would provide HNP with some certainty of potential additional mitigation and protect the public purse from an identified risk for which mitigation was not secured. This could be secured as a requirement should the DCO be granted.