

From: [Marlborough, Neil](#)
To: [Wylfa Newydd](#)
Cc: [Harding, Helen](#); swyddfa@cyngortrefamlwch.co.uk
Subject: Wylfa Newydd Examination Deadline 2: NACP responses
Date: 04 December 2018 20:15:38
Attachments: [image001.png](#)
[NACP Construction working hours.pdf](#)
[NACP Local Opportunities.pdf](#)
[NACP Residential Amenity.pdf](#)
[NACP Suggested site visit locations .pdf](#)
[NACP Temporary workers accommodation.pdf](#)
[NACP Tourism and recreation.pdf](#)
[NACP Traffic and Transport A5025 Treglele.pdf](#)
[NACP Traffic and Transport crosscountry routes.pdf](#)
[NACP Traffic and Transport other matters.pdf](#)

On behalf of the North Anglesey Councils Partnership (NACP), please find within this email and attached their responses to the Deadline 2 requests of the Wylfa Newydd examination.

The responses include the following:

- Written Representations on:
 - Temporary Workers Accommodation
 - Tourism and Recreation
 - Local Opportunities
 - Construction working hours
 - Residential Amenity
 - Traffic and Transport: A5025 Treglele
 - Traffic and Transport: Cross country routes
 - Traffic: other matters
- Recommendations on locations for site visits

In response to the Written Questions posed, two questions were specifically posed to the NACP (referred to as NAP in the WQs):

Q7.0.5: The NACP are surprised that no photomontages have been produced to show the Construction Phase activities at WNDA and request that photomontages are provided from this phase of works. Not showing the predicted impacts from such a major construction exercise, lasting for 9 years, is considered to be a significant omission which risks underplaying the landscape and visual effects from these works in the examination.

Q14.0.10: The NACP have concerns around the focus of temporary worker accommodation on a single campus in the WNDA. Whilst this primarily is due to reasons of worker numbers on one site, and the loss of legacy benefits from using other site(s), the concentration of development in this environmentally sensitive area is also a concern. A smaller scale of development would be less intrusive from an environmental perspective and a better option. Due to the lower numbers of temporary workers which would be able to be accommodated on the WNDA site because of this approach, additional development will be needed elsewhere and can be provided on other site(s) such as Rhosgoch.

Regards

Neil Marlborough
Technical Director, Planning and EIA

Wood Environmental & Infrastructure Solutions UK
Direct: +44 (0)191 2726334
Mobile: +44 (0)7971 337725
www.woodplc.com



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Wylfa Newydd Nuclear Power Station:

NACP Written Representation: Construction working hours

1. Introduction

- 1.1.1 The NACP area has hosted a Nuclear Power Station for over 40 years, with a 9-year construction project preceding this. The NACP support the principle of the Wylfa Newydd project and recognise that the development of this project will require a large-scale construction project with many workers involved. The NACP have concerns about the construction practices, specifically as they relate to worker hours. There is a concern that long worker hours and shift patterns may impact worker's health and lead to an increased risk of accidents both on site and during travel to/from work.

2. Context

- 2.1.1 APP-439 Document 8.24.4 (para 3.2.17 to 3.2.24) confirms that construction workers would have a 10.5 hour working day, excluding transport time which would add 1.5 hours onto the working day for those staff not in the temporary workers accommodation on site. APP-415 Document 8.7 (para 4.3.2) states that the shift patterns would run on a fortnightly basis with 11 days on and 3 days off, with the days off being over a weekend.
- 2.1.2 This approach would result in an average of a 57.75 hour week (only including actual working time), or 66 hours including traveling time (based on those workers staying at the temporary workers accommodation on-site). Horizon has suggested informally that if rest breaks are taken into account average weekly hours will be less than the 48 hour limit stipulated in the Working Time Regulations however the NACP has not yet seen this confirmed in writing.

3. NACP concerns

- 3.1.1 The NACP are concerned over the proposed working practices during the construction phase. It is acknowledged that there are positives and negatives to working long hours, but it is generally considered (Institute for Employment Studies (IES), Working long hours: a review of the evidence, DTI, 2003) that excessive working hours:
- Can lead to poor productivity and quality
 - Are likely to lead to a high incidence of accidents
 - Can lead to poor health and higher absenteeism or staff turnover, and
 - Can lead to social issues such as family break down.

- 3.1.2 It is understood that long hours are part of the culture of the construction industry and it is acknowledged that these working practices are probably endemic amongst sub-contractors. However, the NACP believe this will be driven by short term decision making in order to hit targets and workers maximising reward through overtime (IES, 2003). This does not mean however that the working practices are acceptable, and it is considered no coincidence that the UK construction industry has the highest number of fatal accidents of any industry in the country (HSE, Workplace fatal injuries in Great Britain 2018, July 2018). When the issue of long working hours is combined with matters such as the high prevalence of drug and alcohol abuse in the construction sector (<https://www.ccscheme.org.uk/drugs-and-alcohol-under-the-spotlight/>, accessed 29 November 2018) the concern over safety is further heightened.
- 3.1.3 The NACP are also concerned that at the end of a shift pattern, there will be hundreds if not thousands of workers in a hurry to leave work and get home for the weekend. They will be fatigued from 11 consecutive days of working and there are concerns that there will be many vehicles speeding through the villages on the Island; then the A55 North Wales Expressway before hitting the English Motorway network. Fatigue and excess speed are prime contributors to accidents.
- 3.1.4 In August 2017 ROSPA claimed that fatigue may be a contributory factor in 20% of road accidents and up to one quarter of fatal or serious accidents. These types of crashes are about 50% more likely to result in death or serious injury as they tend to be high speed impacts because a driver who has fallen asleep cannot brake or swerve to avoid or reduce the impact (ROSPA, Road safety Factsheet Driver Fatigue and Road Accidents factsheet, August 2017).
- 3.1.5 Through the SoCG discussions, Horizon have stated that they would be complying with all legal requirements in terms of their working arrangements, and the challenge of changing the embedded culture in the construction industry will be difficult. It will require a major change by sub-contractors in working practices. However, Horizon have also publicly committed to safety being paramount in the Wylfa Newydd project and it is felt that there is more they should be doing, beyond the legal requirements, on this matter.

4. Conclusion

- 4.1.1 The submitted Workforce Management Strategy (APP-413) makes a single reference to the issue of worker hours (bullet point 7, section 2.3) stating that they will comply with relevant standards and legislation. The NACP considers that this is not acceptable for the reasons referred to above. The NACP requests that Horizon review their proposed working practices in this regard and provide a commit to shorter working hours to promote a safer environment for both workers and the public.

Issued by
Neil Marlborough**Approved by**
Sue Birnie**Copyright and non-disclosure notice**

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