PINS: WYLFA NEWYDD DCO APPLICATION OPEN FORUM 25 OCTOBER 2018 Statement by Roger Dobson, Llanbadrig Community Council

First, I must declare a personal and prejudicial interest in that my property is adjacent to the Development Area. The Standards Committee of IACC has given me special dispensation to speak on Horizon matters.

I propose to cover 9 items and with your permission Madam Chair I predict this will take about 14 minutes. The items are:

A general comment about the Project
Site visits
Information (or lack of)
Blasting (variation recent submission)
Marine Off-Loading Facility (variation recent submission)
Mitigation – for Nearby residents
Mitigation – for local communities
Roads
and finally Working hours of construction workers

1. General comment:

Llanbadrig has hosted a Nuclear Power Station for over 60 years. In that time Wylfa A has been a good neighbour employing significant numbers of people many of whom continue to reside within our community. Wylfa A had an exemplary record of efficient generation and safety. Impressively, it generated beyond the original design life by some 20 years. In principle we support the Wylfa Newydd project. We believe it will be very important in meeting the UK's future energy demands whilst making a much-needed contribution to the local and wider North Wales economy.

2. Information:

There have been references to Horizon not providing adequate information or failing to provide information in a timely manner. This has been our experience and I will cite an example shortly but first I would like to make a general point. We recognise the complexity and scale of this project; we are conscious of the considerable burden placed upon the hard working and talented managers of Horizon. I have dealt directly with Horizon managers for some ten years. I have found them courteous, professional and competent. Unfortunately, there is a perception that Horizon gives greater priority to bats, owls and sea birds than it does to people. I hope the panel will encourage Horizon to place a greater priority on people. Now an example: document 6.10.2 ES Volume J2 describes effects upon receptors in Tregele and between Tregele and Cemaes. The document refers to 55 receptors experiencing major adverse effects; it states intra-project cumulative noise effects due to interactions are identified to occur for a period of 32 quarters commencing in Year 1 and 100 quarters commencing in Year 11. It then goes on to state that for commercial and office properties high noise levels during construction could cause annoyance and reduce speech intelligibility. For properties close to the development boundary vibration during construction could cause annoyance, feelings of alarm and, in the most severe cases, could cause damage to structures. Predictably the people I represent are concerned. I wrote to Horizon on the 1st July requesting that they identify affected properties and asking what Horizon intended to do to communicate this to affected residents. I have raised this at several SOCG meetings since and have not received an answer, save clarification that some of the receptors are not residential properties. In summary after 15 weeks we are still no clearer and there are only 5 weeks and 3 days to deadline 2. This jeopardises the SOCG

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process. I accept that on our side we need to bring more urgency to the SOCG process but so does Horizon.

3. Site visits:

Madam Chair - on Tuesday you referred to site visits that you had carried out and intended to undertake. I also understood that you are open to suggestion about visits. I would encourage you and your colleagues to specifically visit Tregele, Cemaes and Llanfechell. As you travel to site you may also wish to note the 60mph speed limit reducing to 40mph on the A5025 as you approach the Tregele Garage and road junctions. I believe it would also be helpful for you to experience the minor road through Tregele and Llanfechell. You would also be welcome to visit my own property which overlooks about 2/3rds of the development and has been described by an Officer of the County Council as a 'viewing platform'.

4. MOLF – increased movements:

I referred yesterday to my role as Chair of the Cemaes Harbour Committee. Recorded history of Cemaes Harbour goes back to medieval times. It has been in the ownership of Llanbadrig Community Council since 1965. The harbour is tidal but when tides permit its acts as a harbour of refuge. In recent times we have facilitated crew transfers for Horizon's off shore drilling activities.

We continue to be committed to help Horizon for the construction and operation of the MOLF and other Horizon marine activities. We support the plan to increase movements for the MOLF because it will reduce road traffic and is environmentally the best logistic solution.

5. Blasting:

Similarly, we support Horizon's proposal to extend the permitted hours for blasting subject to the evening limit being 7 p.m. and not dusk where that is later. We believe that most children should be in bed by that time.

6. Mitigation: -

For Nearby residents within 1 kilometre of the new station boundary. Horizon published a Neighbourhood Support Scheme in 2014 which has only had minor changes since. The plan has two components: mitigation for property owners who remain and Property Price Support for those who leave. Horizon has argued that their plan draws upon relevant precedent from other similar projects. Relevant precedent in 2014 is probably not relevant today or indeed in 2020. We believe that HS2 and Heathrow Third Runway are relevant precedents. In addition, the plan refers to the area being close to an active Wylfa A – which has been dormant since December 2015 and is scheduled to complete de fuelling by the end of 2019.

7. Site Campus:

There are conflicting views in our Community Council about the merits of concentrating temporary Worker Accommodation on one site as opposed to across several sites, which could have a legacy benefit. My personal view based on commercial experience is that Horizon's arguments about impact on the Welsh language, traffic, travel time of workers and importantly cost are very persuasive.

If the 4,000- bed campus becomes reality we are concerned that Horizon brings forward some plan including contingencies for mitigating the effect on local communities. There are residents of Cemaes who lived through the Wylfa A construction. They liken Cemaes at that time to the Klondike gold rush. The equivalent of the 'Wild West saloon' was a hotel called

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the Faraway which was at the bottom of my garden. As a community we want the best of all worlds. We are keen that Horizon workers patronise our local businesses and inject some welcome prosperity. At the same time, we don't want any anti-social behaviour or even worse criminal activity. We accept there is no easy answer to this conundrum, but we wonder whether the North Wales Police should consider a temporary police station in one of Horizon's empty properties. Horizon might fund extending CCTV in the villages and possibly deploy its mobile security personnel in a deterrent role.

8. Roads:

We have heard that road management is the responsibility of the County Council. We have been lobbying the IACC for over six months on the matter of reducing speed limits on the A5025 at Tregele with installation of a pedestrian crossing; and the speed limit on the minor road through Tregele and Llanfechell because we believe they are unsafe now. Increased Traffic resulting from the SPC activity will make matters worse and traffic associated with the main construction will make matters very much worse. We believe Horizon should prohibit workers from using the minor road as a 'rat run' and monitor use of the rat run by workers. We believe that given our frustrations with the County Council that body may listen to you and Horizon more than they have listened to us.

9. Workers hours:

Horizon are currently proposing that construction workers should be employed on a variety of shifts. The underlying concept is that they work 10 or 10.5-hour shifts timed from passing through turnstiles at the site and not accounting for travel time. This equates to people working on average 57.5 hours a week. This is legal in the UK because we allow individuals to opt out of the working time regulations. It would not be possible in most European countries.

I am interested in this because of a potential adverse impact upon my community. I am also very concerned because of my experience as an HR professional. For 30 years up until retirement I held several HR Director positions in National and International businesses. On three occasions I have been directly involved in moving organisations away from a long hours culture: in domestic appliance manufacturing, Scotch Whisky distilling and coal mining. I am horrified that Horizon plan to construct a nuclear power station in the 21st century using 19th century Victorian working practices.

It is now well established that excessive working hours results in

- poor productivity and quality
- a high incidence of accidents
- poor health and high absenteeism
- and social issues such as family break down

I understand that long hours are part of the culture of the construction industry and I accept it is probably endemic amongst sub-contractors. The reasons for this will be un-enlightened managers and senior managers taking short term decisions to hit targets and workers maximising reward through overtime. It is no coincidence that the UK Construction industry has the worst record for fatal accidents of any industry.

Let us also imagine the end of shift on a Friday night when hundreds if not thousands of workers will hit the road in a hurry to get home. They will be fatigued from 11 consecutive days of working and many will drive too fast through our villages on the Island; then the A55 North Wales Expressway before hitting the English Motorway network.

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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.

I cannot imagine that Horizon intends to operate the new power station with employees working excessive hours. I am told that 38 hours per week was the norm at Wylfa A. At Sellafield there is a special procedure for approval of working beyond 48 hours per week. It seems to me very unwise to assume that excessive hours for workers is the only way to deliver this project.

I can imagine that reducing working hours for construction workers on the project will be quite a challenge. It will require a major change by sub-contractors in working practices. This will not be easy. However, if Horizon is true to its commitment to safety being paramount they should at least try.