

From: [REDACTED]
To: [Stephens, Jake](#); [Wylfa Newydd](#)
Subject: Written Representations
Date: 04 December 2018 11:42:56
Attachments: [Written Representation deadline 2 Introduction.docx](#)
[Shipping and navigation Written Representation.docx](#)
[A5025 changes FINAL.docx](#)

Bore da Kay a Jake,

Please find attached three documents:

1. Written Representation and summary of Shipping and Navigation and Traffic and Transport (NMU)
2. Written Representation Shipping and Navigation
3. Written Representation Traffic and Transport (NMU)

Cofion,
Dafydd

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Wylfa Newydd DCO Examination

Written Representation at Deadline 2 – Dafydd Griffiths

Traffic and Transport – Non-Motorised Users (NMU)

Introduction

I was born in north Wales and have lived and worked in Wales, England and abroad. For the past 30 years my home has been on Anglesey. I have been a member of Llaneilian Community Council continuously for close to 30 years. I currently represent the community council on the Wylfa Newydd Project Liaison Group (WNPLG) and the North Anglesey Councils' Partnership (NACP).

I own a vehicle and living in a rural area use it frequently. However, I also enjoy cycling and walking and am currently walking the Anglesey Coast Path. I have advocated, supported and participated in active travel for work and leisure for about half a century. This was well before the term was popularised by the Welsh Government by the passing of the Active Travel (Wales) Act 2013.

I am a fluent Welsh speaker but I have chosen to submit this written representation in English as I will frequently be referencing documents submitted by the applicant in that language.

This written representation represents my personal views on specific elements of the Transport and Traffic proposals within the DCO documentation and the changes to the A5025. It focuses, in the main, on provision for cyclists but I recognise that any joint use provision is also likely to benefit walkers / pedestrians. I have no experience and am in no position to comment on the requirements of horse riders. Any underlining is my emphasis.

Wylfa B / Wylfa Newydd

Perhaps I could start with a little context from the point of view of a local resident. The Wylfa B / Wylfa Newydd Project has been on and off for most of the time I have lived on Anglesey. Abandonment of the original Wylfa B project in the late 80s early 90s resulted in a quiet period but around 2009 Eon/RWE formed Horizon and purchased the Wylfa site with a view to developing a Nuclear Power Station. Once again this came to nothing with Eon/RWE abandoning the building of nuclear facilities. Horizon was purchased by Hitachi in late 2012 and a series of informal and formal pre-applications consultations have taken place since then, finally culminating in the DCO application.

Provision for NMU and the need for sustainable travel in rural communities.

For shorter journeys, non-motorised forms of transport can provide environmentally friendly, low cost, independent and flexible travel options to all sectors of society and are especially important for those with little or no access to motor vehicles – the young, job-seekers and people on low incomes.

The Pre-Application process

When the formal Pre-consultation stages began I was reassured to see references similar to the following recorded in APP-040 5.1 Consultation Report Appendix A.1 to A.7:

INTEGRATED TRAFFIC AND TRANSPORT STRATEGY

“We are committed to ensuring that the transport needs of the Project are managed to reduce effects on the communities of Anglesey. We want to do this by moving people and goods efficiently,

managing environmental impacts, ensuring user and community safety and presenting solutions that offer some potential legacy benefits.

The principles of the draft ITTS seek to:

- *Ensure the safety of roads for all types of users, including pedestrians and cyclists;”*

(First bullet point of 10. On page 25 of the original document and page 89 of APP-040)

“We consider the following to have the potential to deliver a positive legacy for Anglesey:

- *Sustainable transport options, such as improvements to walking, cycling or bus routes that will improve the long-term connectivity on Anglesey for residents and visitors.”*

(Fifth bullet point of 7. On page 33 of the original document and page 98 of APP-040)

However, with each iteration of the pre-application consultation, I began to feel less and less reassured that sufficient weight was being given to these original principles. I am also aware that the issue of provision for NMUs was raised by myself, other individuals and a County Councillor at the Wylfa Newydd Liaison Group (WNLG) meetings on a number of occasions. The applicant ‘noted’ the comments but gave little in the way of specific commitments or details of any schemes that had been discussed with the IACC.

I would also draw the panel’s attention to responses during the lengthy consultation period from various stakeholders and members of the public who, whilst welcoming improvements to the A5025, also highlighted the lack of provision for NMUs particularly cyclists and pedestrians and at each consultation stage encouraged the applicant to provide appropriate provision. Whilst individuals may have received feedback, as far as I am aware the general public have only had full access to read these consultation comments once they were made available on the Infrastructure Planning Inspectorate website.

I would agree with the applicant that *“constructing a new nuclear power station involves the transport of significant amounts of materials, large components and people travelling to work on the construction site”* (2.2.1 of 6.7.2 ES Volume GA5025 Off line Highway Improvements G2 Alternatives and Design Evolution).

It is because of the inevitable disruption that this will cause on the A5025 over a 10 year construction period that the needs of vulnerable Non-Motorised Users (NMU) need to be considered carefully. With the information that has become available very recently with the publication, in full, of all the applicant’s DCO submission documents I would urge the Planning Inspectorate to examine if the needs of vulnerable Non-Motorised Users (NMU) have been given sufficient attention in the application.

MOLF comments

I welcome the use of sea transportation and the Marine Off Loading Facility (MOLF) to substantially reduce the number of HGV and AIL movements that will be needed on the A5025 and to bring at least 60% of bulk materials and indivisible loads to the site. I also note the applicant’s target of delivering 80% of all bulk materials to the site and I would encourage the applicant to attempt to meet this figure.

However, it is recognised by the applicant that there will still be a substantial increase in the HGV, bus and private car journeys that will be made during the Wylfa Newydd construction phase along the A5025 between Valley and the Wylfa Newydd Development Area. It is for this reason that 16.5

km of both Online and Offline Highway 'improvements' have been proposed. There will also be more traffic travelling along the A5025 through Benllech, Brynrefail, Amlwch, Bull Bay, Cemaes and Tregele to the Wylfa Newydd Development Area. The applicant references this route as A5025 East. The applicant currently considers that any increase in traffic on this section of the A5025 East to be 'within capacity'. There is a complete lack of consideration for the needs of NMUs on this section.

I have located and read with interest the appropriate DCO documents that became publicly available for the first time at the end of June 2018 shortly after they were lodged with the Infrastructure Planning Inspectorate. There are also documents that the applicant made public during November 2017 as part of the On-Line TCPA application that contain brief notes of meetings held with key stakeholders such as IACC and Sustrans and consultation comments from Gwynedd CC and individuals. These meetings and comments pre-date the separation of planning agreement processes for the On-Line and Off-Line works and are important. All of the above documents need to be considered in order to evaluate how the applicant has responded to suggestions and comments during the pre-application consultation. I would argue that the overarching Traffic and Transport proposals do not currently meet the needs of vulnerable road users such as cyclists and pedestrians.

Whilst the changes to the A5025 between Valley and the WNDA are positive improvements for motorised users I would suggest that the situation for non-motorised users (NMUs) is much more mixed. I have detailed knowledge of the network of minor roads that run near to or join the A5025 between Valley, the WNDA and Amlwch. My comments will focus, in the main, on the impact of changes to the A5025 on cycling provision. However, adequate provision for cyclists will often also be advantageous to walkers / pedestrians.

We are all aware that we need to make sensible lifestyle choices about what we eat and take regular exercise. Childhood obesity is at record levels. The NHS encourages us to try to be active daily and one suggestion is strength exercises combined with at least 2 ½ hrs of moderate aerobic activity such as cycling or brisk walking every week.

I am sure that panel members are familiar with the Welsh Government's Active Travel Act (2013). Carwyn Jones, the current First Minister of Wales *"wants to see a Wales where walking and cycling are the most normal ways to get around"*. I will return to this act shortly.

Matt Hancock, the Secretary of State for Health and Social Care in the UK government very recently, and rather controversially, said that *"the general public need to take more responsibility for their own health in order to increase life expectancy and prevent illness"*. He noted the importance of staying active.

Clearly, governments are using a combination of 'nudge' strategies and legislation to encourage the population to be more active due to its link to better mental and physical health. When opportunities to provide facilities that allow the population to be more active they must be taken.

I was very pleased to see that in 2013 Anglesey County Council (IACC) published its Cycling Strategy. The minutes of the IACC Executive meeting on the 13th January 2014 note that it was:

"RESOLVED to approve the Cycling Strategy for use as a lead document for the development of cycling facilities on Anglesey."

The panel will note the following on page 22 of the strategy:

4.4.2 A5025 Corridor

“Improvements for cycling alongside, or close to, the A5025 between Valley and Wylfa, and Wylfa and Amlwch. The potential nuclear new build at Wylfa would necessitate improvements to the A5025 between these locations which means that under the Active Travel (Wales) Act 2013 developers would have to look at enhancing the provision for walkers and cyclists. This would also improve leisure links to the north west of the island.”

Let me be clear, whilst the Cycling Strategy indicates a potential route that follows the line of the A5025 that is not what I am advocating. North Anglesey has a network of unclassified roads but to create useful routes for NMUs for both Active Travel and leisure use there are strategic links along the A5025 that need to be in place. The applicant's documentation has identified most of these but is proposing to action only a modest percentage.

I am sure the panel are fully aware of the Welsh Government's Active Travel Guidance document and in particular section 9 - Creating, Improving and Managing Highways that provides guidance for local authorities and specifically refers to schemes promoted by the private sector.

In particular I would wish to draw your attention to the following extracts.

“Some newly-built highways and ‘improvement’ schemes have failed to improve conditions for pedestrians and cyclists – and in some cases have made things worse” (9.1.4)

“There may sometimes be a tension between objectives, for example between increasing motor traffic capacity and providing for pedestrians and cyclists, but the statutory obligation to enhance provision for active travel means that this should be given a high priority throughout the design process.” (9.2.7)

“Designers of new highways should consider the five attributes of good walking and cycling routes ... coherent, direct, safe, comfortable and attractive – and find ways to meet them as part of the scheme.” (9.3.2)

“As a general rule, all highways, even in rural areas, should provide paved footways and cycle facilities that are appropriate to the volume and speed of motor traffic that will be using it and the number of users that can be anticipated.” (9.3.6)

“Many new highways are promoted, funded, designed and built by the private sector as part of new development schemes. Even though the local authority may not be directly responsible for the scheme it must use its powers to control development and approve technical designs to fulfil its obligations under the Active Travel Act to bring benefits to pedestrians and cyclists.” (9.3.9)

“Active Travel connections should not be seen as optional; developments that do not make adequate provision for walking and cycling should not be approved.” (9.3.20)

The DCO documentation pack reveal that early planning for changes to the A5025 began in 2011. Since this date Horizon have been purchased by Hitachi and there has been a significant change in the consent process with 4 sections of the A5025 changes consented under TCPA and the other 4 sections within the DCO process. This may be one reason why, in my opinion as a regular NMU, the A5025 changes only partially deliver the applicants intention to *“ensure that the improvements are compatible in terms of their design to deliver a cohesively considered package of highway improvements”*. (APP-409 Horizon Doc. 8.2.3 paragraph 1.2.6)

As they currently stand the changes do not deliver a cohesively considered package of highway improvements for NMU. Indeed, the increase in speeds and volume will be detrimental to NMUs attempting to use certain sections.

Having examined the detailed drawings available on the applicant's website and the Infrastructure Planning website I welcome the following changes which are, in my view, improvements for NMUs.

- a. The 250 metre joint use footway / cycleway alongside the A5025 at Llanynggheddl that forms part of the National Cycle Route 5 and links Bodedern to the A5 on the northern outskirts of Valley.
- b. The 500 metre joint use footway / cycleway alongside the A5025 between the Bwlch turn off to Llanfechell and the new roundabout at the WNDA.
- c. The 150 metre joint use footway / cycleway that links the unclassified road from Llanfwrog to the unclassified road to Stryd y Facsen (Plan WN0902-HZDCO-OHW-DRG-00016).
- d. The 300 metre joint use footway / cycleway between Llanfaethlu and the Black Lion. (Please note additional comment re. at grade crossing point)

I am not clear when it is proposed to action a. and b. above under the TCPA permission. Could the applicant confirm the details?

The 500 metre joint use footway / cycleway alongside the A5025 between Nanner Road and the Bwlch turn off towards Llanfechell is a rerouting of NCN Route 566. This is needed due to the minor road section that was previously used having to be closed due to it crossing the site of the proposed development. I have received confirmation from the applicant that this section will be actioned under the TCPA at the same time as resurfacing work in the area.

Part of my Relevant Representation application was based on a line drawing that I had located that indicated a crossing point at Bwlch junction. The detailed drawings now show the position of the road crossing a short distance from Bwlch junction. However, I do remain concerned that whilst the sight line in the direction of Valley is over 160m the sight line in the direction of the WNDA is only a little over 40m. Unless vegetation at the side of the road is cleared and regular maintenance carried out this sightline distance is dangerous. (For information - 60mph is 26.8 metres/second.)

I now wish to draw the attention of the panel to the following relevant design criteria contained in APP-305 6.7.2 ES Volume G - A5025 Off-line Highway Improvements G2 - Alternatives and design evolution

"2.2.36 As part of the early phases of DMRB Stage 2 design development undertaken from late 2014 to early 2015 it was identified that all options within sections 1, 3, 5 and 7:

- should consider how and where measures such as underpasses beneath the road, access tracks around the road and gates should be provided, to enable continued access for landowners, users of community facilities and local residents;*
- should reduce the need for stopping-up of existing routes and junctions, due to the potential disruption such changes can cause to people and the movements they make on the local highway network, and where unavoidable turning heads should be included in the design(s); and*
- should seek to include, where possible, appropriate segregated cycleway and/or footway provisions along one side of the A5025 to improve route connectivity in the area."*

With the exception of the 4 improvements noted above and the NCN 566 rerouted section I can see little evidence that the above design criteria have been given sufficient weighting in the applicant's current proposals.

It is disappointing that despite:

- The applicant setting out criteria “to include, *where possible, appropriate segregated cycleway and/or footway provisions along one side of the A5025 to improve route connectivity in the area*”;
- IACC making a clear statement in its Cycling Strategy regarding provision for NMUs on the A5025 between Amlwch and Valley;
- The provisions of the Active Travel (Wales) Act 2013 and advice in the Guidance document; and
- Consultation responses at all stages from individuals, local community councils, Gwynedd Council and IACC

that the needs of NMUs have been given insufficient weighting during the design and development of the proposed changes to the A5025.

Interface between DCO and TCPA A5025 changes

Currently, whilst there is a presumption in favour of granting consent to applications for energy NSIPs, the proposals may not be granted by the UK Secretary of State or Hitachi may not make a favourable final investment decision.

The applicant’s decision to bring forward resurfacing the length of the current A5025 as far as the WNDA (the On-Line changes) and completing some other limited works is understandable and welcomed.

The facilities previously noted for NMUs that have been agreed under the TCPA application are ‘standalone’. Each of them have an appropriate start point and end point and are not reliant on the success of the DCO process or a positive final investment decision.

However, upon completion of the DCO Off-Line changes, as currently proposed, NMUs will see limited improvement in connectivity. Indeed, as during the 10 year construction phase the A5025 will carry significantly higher motorised vehicle numbers and at higher average speeds, the conditions experienced by NMUs will actually be worse in some areas.

However, the Off-Line changes do provide opportunities for schemes that are currently not proposed. Provision for NMUs could be significantly improved resulting in increased safety, improved connectivity between towns and villages, an expansion in Active Travel routes, an expansion in access to quiet recreational routes in the North Anglesey area and at a very, very small percentage of the total cost of a project currently estimated to be £10,000,000,000 - £20,000,000,000.

This will be one of the largest construction projects in Europe. Construction will last 10 years. Unless suitable provision is made at appropriate points on the A5025 the volume of traffic will severely restrict the options for non-motorised users.

Proposals

The following comments and proposals are a summary of my areas of concern and are based on my own knowledge, and information provided by the applicant in APP-307 Horizon Doc 6.7.4 ES Volume G - A5025 Off-line Highway Improvements G4 - Public access and recreation. This is the assessment of potential public access and recreation effects resulting from the construction and operation of the A5025 Off-line Highway Improvements.

In general, the applicant’s document tends to focus almost entirely on the routes that form part of the National Cycle Network eg NCN5 and NCN566 and other ‘promoted’ cycle routes. It also makes a

number of statements similar to the following: “While the route is used by recreational cyclists it is not of particular importance and other routes of similar or greater recreational value are available within the local area”. It is important to point out that, other than on motorways, roads are for the use of all – including cyclists and other NMUs. It is inappropriate for the applicant to decide on the importance or value of a particular route and to suggest that cyclists should just use other routes.

Perhaps I can highlight the ‘missing links’ that are important to allow NMUs to safely use the A5025 corridor between Valley and Amlwch. I can provide further details if required.

Llanfachraeth link to Llanynghenedl

This short section has been identified by the applicant as part of an active travel route. It would also link Llanfachraeth to Bededern, Valley and Holyhead via the existing NCN 5. This was discussed at a meeting between Sustrans, IACC and the applicant. Rejected by the applicant.

Llanfaethlu link to Rhydwyn / Llanrhyddlad

This has been identified by the applicant as a potential active travel route for children. The applicant’s documentation incorrectly states that the villages are over 2 miles from the new school at Llanfaethlu. No evidence of any discussions with IACC.

Llanfaethlu via Black Lion link to Llanddeusant

This has been identified by the applicant as a potential active travel route for children. Relatively recently a joint use footway / cycleway has been agreed. Despite providing a farm underpass very nearby the crossing point for NMUs is at grade. Was an underpass considered?

Valley link to Llanynghenedl (direct)

This has been identified by the applicant as a potential active travel route. The NCN 5 currently provides a route that passes to the northern outskirts of Valley. This additional link would be direct to the shopping area in Valley. No evidence of any discussions with IACC.

Cefn Coch

Substantial ramps and an ‘at grade’ crossing of the A5025 is proposed. This section contains a farm underpass and the only overbridge that seems to provide access to an attenuation pond. What consideration was given to providing an underpass for NMUs? Is a modern concrete overbridge in keeping with the rural nature of the A5025?

Amlwch link to Wylfa Newydd Power Station.

In response to proposals for changes to the A5025 I am aware that the NACP and many individuals have encouraged the applicant to engage with stakeholders to significantly improve the transport infrastructure between Amlwch and the WNDA for the safety of all users both motorised and non-motorised. In the context of this submission I note the following:

“6.2.6 The Power Station will provide significant employment opportunities for its construction phase and these workers are likely to be resident on Anglesey. The village of Cemaes and the town of Amlwch are within a feasible cycling commuter zone and therefore the route along the A5025 between Amlwch and the Power Station could, once the Power Station is operational, be considered to be an active travel route between two communities and a key workplace.” (Wylfa Newydd Project A5025 On-line Highway Improvements - Planning Statement)

It is extremely disappointing to note the applicant's statement above that indicates that only once the Power Station is operational will the route between Amlwch, Cemaes and the Power Station be considered as an active travel route.

In conclusion

A project of this scale and magnitude clearly needs a robust and integrated strategy for traffic and transport. It is my view, that the current proposals do not give sufficient weight to the needs of NMUs along the A5025 corridor between Valley and Amlwch.

Despite the applicant's exhortation during the pre-application stages that 'Your views count', unfortunately, my experience and clearly that of other members of the public who have commented on the proposals and attempted to engage is that the applicant responds by attempting to justify their proposals rather than true engagement. That is why at this late stage in the process, the current proposals are still poorly aligned to the needs of current and future non-motorised users. As a result of this lack of engagement I decided that direct engagement in the DCO examination process might be a more effective means of influencing the project proposals.

I request that the panel arrange a specific timetabled slot to discuss the adequacy of the applicant's proposals and its impact on non-motorised users of the A5025. If you require further detailed information please contact me.

Thank you.

END – Traffic and transport (NMU)