

**From:** [PMO](#)  
**To:** [Wylfa Newydd](#)  
**Subject:** RE: IACC Deadline 2 Submission : Local Impact Report - Traffic and Transport (email 18)  
**Date:** 04 December 2018 20:01:59  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[Traffic and Transport.pdf](#)

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**Please note, a number of emails will follow in relation to the LIR – we will confirm the final e-mail.**

Pnawn Da/ *Good afternoon,*

Gweler ynghlwm cynrychiolaeth CSYM mewn perthynas â'r uchod / *Please see IACC's representation in respect of the above.*

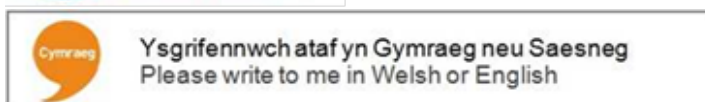
Bydd fersiwn Gymraeg yn cael ei ddarparu cyn gynted a phosib / *A Welsh version of the submission will be provided in due course.*

Cofion/ *Regards,*  
Manon

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Mae'r neges e-bost hon a'r ffeiliau a drosglwyddyd ynghlwm gyda hi yn gyfrinachol ac efallai bod breintiau cyfreithiol ynghlwm wrthynt. Yr unig berson sydd i'r hawl i'w darllen, eu copio a'u defnyddio yw'r person y bwriadwyd eu gyrru nhw ato. Petaech wedi derbyn y neges e-bost hon mewn camgymeriad yna, os gwelwch yn dda, rhowch wybod i'r Rheolwr Systemau yn syth gan ddefnyddio'r manylion isod, a pheidiwch datgelu na chopio'r cynnwys i neb arall.

Mae cynnwys y neges e-bost hon yn cynrychioli sylwadau'r gyrrwr yn unig ac nid o angenrheidrwydd yn cynrychioli sylwadau Cyngor Sir Ynys Môn. Mae Cyngor Sir Ynys Môn yn cadw a diogelu ei hawliau i fonitro yr holl negeseuon e-bost trwy ei rwydweithiau mewnol ac allanol.

Croeso i chi ddelio gyda'r Cyngor yn Gymraeg neu'n Saesneg. Cewch yr un safon o wasanaeth yn y ddwy iaith.

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# Ynys Môn

## THE ISLE OF Anglesey

### Wylfa Newydd Local Impact Report

Chapter 10: Traffic and Transport

December 2018

PINS Ref: EN010007



CYNGOR SIR  
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## **1.0 Traffic and Transport**

### **1.1 Overview of Impacts**

- 1.1.1 The construction of the Wylfa Newydd Power Station, the Associated Developments and other facilities is a major engineering undertaking that will require the transport and movement of workers, travelling daily and staying in temporary accommodation, to and from the site for work and during non-working hours, materials, goods and services and plant throughout all project phases. The Wylfa Newydd Project (WNP) development is forecasted to generate significant levels of traffic; the construction activities will require a total labour workforce of up to 9,000 workers at peak and over 5.7 million tonnes of bulk material will require transporting over the 10-year construction period.
- 1.1.2 These traffic movements will impact upon the highways network, which comprises a hierarchy of roads from the strategic level covering the A55 Trunk Road, including the Britannia Bridge, managed by the Welsh Government to the local level of classified and unclassified roads which are the responsibility of the IACC (as Local Highway Authority). The IACC has had regard to this overall hierarchy from the strategic to local when considering the impacts as they are physically connected and therefore have a high degree of interdependence to enable smooth running of the network in its totality. At the local level, the IACC is alert to concerns expressed by local people living along the A5025, as well as effects on unclassified roads used as short cuts to and from the site which can turn into 'rat runs', and the disruption and undue nuisance arising from construction worker 'fly-parking'.
- 1.1.3 At 'peak construction', Horizon have estimated that there will be nearly 1,800 daily one-way vehicles or around 3,500 two-way vehicles associated with the development, and high traffic volumes generated by the project will be experienced during the peak summer holiday season.
- 1.1.4 Predicted impacts in respect of traffic and transport relate to the construction phase commencing with the associated development sites followed by the main site works. Horizon propose that both the A5025 Off-line improvements and the Marine Off-Loading Facility (MOLF) is operational by the date of 'peak construction'. This premise has been contested by the IACC from the outset. This is on account of the scale movement of bulk materials required in the lead up to 'peak construction' and the negative effects of these loads being undertaken by goods vehicles using the strategic and local highways networks in addition to the other traffic generated by the project at these times. The IACC is therefore working on the basis that the MOLF is constructed and operation by the commencement of the construction phase. Without critical mitigation such as the Off-line improvements and the MOLF, the impacts associated with an increase in HGV movements would not be within the envelope and would be unconsented. The IACC would seek to restrict/prohibit construction until Horizon have assessed the impact and made amends to the DCO, including the traffic mitigation.

1.1.5 The positive impacts of the Wylfa Newydd Project on Traffic and Transport:

- (a) The evidence shows that the percentage increase in HGVs along the A5025 from Valley to WNP site would be significant and would have a detrimental effect on receptors that are sensitive to changes in traffic flow such as schools and villages. Mitigation in the form of bypasses (or Off-Line highway improvements) has been identified to address the impacts on the communities/villages. This results in a positive impact and a legacy benefit of reducing traffic through these villages. The DCO transport evidence base also concludes that this would result in a reduction in journey times, accidents and driver stress.

1.1.6 The neutral impacts of the Wylfa Newydd Project on Traffic and Transport:

- (a) The IACC has not identified any neutral impacts.

1.1.8 The negative impacts of the Wylfa Newydd Project on Traffic and Transport:

- (a) The absence of an Early Years Strategy (the construction period for the Associated Developments, MOLF, A5025 improvements, Site Campus Phase 1, Site Grading, Earthworks and Excavations) which sets out the management and planning of construction traffic movements. The strategy shall include an agreed cap/threshold of construction vehicle numbers for before opening of the Off-Line A5025 improvements and before opening of the MOLF.
- (b) The absence of satellite Park & Share facilities should the car sharing strategy (including monitoring and enforcement) fail. This will result in overspill parking, either through breaching the parking limit within the two proposed car parks, or 'fly parking' on the local road network.
- (c) Insufficient measures are proposed in relation to its shuttle bus services to address such concerns as 'fly parking' around bus stops, the potential use of hail and ride services and inappropriate routeing and bus stops, all of which would have an impact on road safety and the amenity of local communities.
- (d) Significant increase in uncontrolled traffic numbers using Class II, III and unclassified roads to access the parking spaces at the WNP site, especially on a daily commuting basis.
- (e) Damage to the road network as a consequence of construction traffic related to the Main Site and the Associated Development sites.
- (f) Potential capacity issues at key A55 interchange roundabouts, which has not been confirmed due to the lack of traffic data of flows at the junctions and detailed information of the operation of the proposed Park & Ride.
- (g) Cumulative impact with the North Wales Connection Project.

1.1.9 At present, the positive impact gained through the Off-Line improvements is at risk due to the lack of an Early Years Construction Traffic Strategy. It should also be noted that through additional agreed mitigation and management measures, negative impacts of the WNP on Traffic and Transport could be reduced.

1.1.10 This LIR chapter provides a summary of the content of the Topic Paper on Traffic and Transportation.

## **2.0 Context**

### **2.1 Road**

2.1.1 The main WNP site is accessed via the A5025, a local distributor road which routes around the Island and provides the primary connection between the site and the strategic road network links between Holyhead and the mainland which comprise the A55, and also the A5. 16.5km of the A5025 has been identified for improvement running from the proposed Power Station Access Road Junction south to Valley. The current accident levels for this section of the A5025 are below national average, which takes into consideration traffic flow rates. No works are proposed east of the Power Station main site. The length of A5025 identified for improvement has been divided into eight sections, with a further section associated with the proposed Power Station Access Road Junction. Of these, Sections 1, 3, 5 and 7 and the Power Station Access Road Junction are included within the scope of the A5025 Off-line Highway Improvements. The purpose of these works (and the on-line works which are the subject of a TCPA consent) are to improve road safety, reduce congestion and to address issues relating to environmental effects and the amenity of residents living along the A5025 corridor. The works are identified by Horizon as being a key mitigation measure in the context of the WNP and the submitted Phasing Plan<sup>3</sup> indicates that work will commence in the middle of construction year 1 and complete by the end of year 2. The works will be permanent.

2.1.2 The IACC recognizes the work done to date on the development of the A5025 On-line and Off-line highway improvements which will form a vital component of Horizon's transport strategy, including reducing environmental impacts of the project and providing a legacy benefit.

2.1.3 The A55 forms part of the E22 Euroroute which stretches between Holyhead Port on Anglesey and Ishim in Russia. The A55 crosses Anglesey and uses the Britannia Bridge to reach the mainland. The E22 forms part of the Trans European Road Network (TEN) route. The Anglesey section of the A55 covers approximately 36km and was constructed as a Private Finance Initiative between Carillion plc, the John Laing Group plc and the Welsh Government. The two companies earn a shadow toll, paid by the Welsh Government, based on vehicle numbers and lane availability and are responsible for the maintenance of the Anglesey section for the duration of their 30-year toll agreement, which expires in 2028. The IACC have no jurisdiction over the operation and maintenance of the A55 across Anglesey.

2.1.4 The two bridges over the Menai Strait are the only transport links between Anglesey and the mainland. Both are historic structures with limited road

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<sup>1</sup> 2017 Average Annual Daily Traffic (AADT) based on traffic counts. Source: Department for Transport (DfT) traffic count data - [\(Link\)](#)

<sup>2</sup> Examination Library Reference – APP-[100]

<sup>3</sup> Examination Library Reference – APP-[447]

width. Network rail owns the Britannia Bridge as the deck below the highway is a heavy rail line. Both bridges can suffer from traffic delays during peak periods, which include the main holiday season as well as typical commuting peaks. During severe weather conditions, one or more of the bridges can be closed for safety reasons either to high-sided vehicles or to all traffic.

- 2.1.5 Road transport is key to the Island tourism sector with extremely limited scope for alternative transport methods. Road congestion, delays, reliability of journey time will all impact on the quality of experience and the decision to visit. As an Island destination dependent on two bridges, regular bottlenecks and traffic jams already occur. A single incident on these sole access routes is highly disruptive and illustrates the network's fragility<sup>4</sup>.
- 2.1.6 The Menai Bridge is a diversion route when there are closures of Britannia Bridge. Whilst this has not been identified as a route for construction HGVs or any other vehicles associated with the development proposals, it is inevitable that some development traffic would use it, particularly if the Britannia Bridge is closed. Increases in its use would have a negative impact on the local community.
- 2.1.7 Across Anglesey, the A5 is a single carriageway road that connects Holyhead with the Menai Bridge. The A5 was formerly the principal route crossing the island until the A55 opened and runs broadly parallel to the new route. The A5 is subject to varying speed limits: predominantly derestricted between settlements and reducing to 30mph when it passes through urban areas.
- 2.1.8 All other highway routes on the Island are county roads maintained by IACC as the local highways authority. The A4080 loops around the southern part of the Island linking Llanfairpwll to junction 5 of the A55. The A5025 follows the northern coastline to link Menai Bridge and Valley. The A545 runs along the southeast coast of the Island between Menai Bridge and Beaumaris. All three routes are single carriageway of varying quality.
- 2.1.9 The A5/A5025 route from Holyhead to Wylfa is a Highways Agency Class D advisory heavy load route.

## **2.2 Sea**

- 2.2.1 The nearest port for the potential direct delivery of materials and passengers by sea is Holyhead Port, which is located some 25km south of the Power Station Site on the northern side of Holy Island. The port is operated by Stena Line Ports Ltd and it provides car and passenger services to Dublin in Ireland and forms the principal surface transport link to Ireland from North Wales and the north-west of England.

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<sup>4</sup> This was witnessed recently (August 2018) where a fatal road traffic collision resulted in the closure of the Britannia Bridge for 8 hours.



## **2.3 Rail**

- 2.3.1 Anglesey is served by a railway that extends from Chester along the North Wales coast to Bangor, across the Britannia Bridge and on to Holyhead. The main stations are at Holyhead and Valley, and Bangor on the mainland. The rail services form part of the North Wales Coast Line which is operated by Transport for Wales.
- 2.3.2 The North Wales Coast Line carries a limited volume of freight with occasional trains from Penmaenmawr quarry and the Valley railhead. Although there are available train paths for freight, the current gauge of this line prevents the most common containers, used by the majority of European and deep-sea shipping, being transported along this route to Holyhead. Furthermore, there are no intermodal facilities at Holyhead, which would allow the transfer of containers between rail and sea.
- 2.3.3 The railhead at Valley was previously used to transfer waste from the Existing Power Station to dedicated rail services when it was operational.

## **2.4 Port of Holyhead**

- 2.4.1 The Port of Holyhead is 23km south west of the site and serves passenger ferries and commercial freight and is one of the busiest terminals in the UK. Vehicular access to the port is constrained at times of peak operation due to road capacity issues. Approximately 220,000 passengers used the port in 2015-16.
- 2.4.5 With regard to marine transportation the IACC views the Port of Holyhead as an integral component of the sustainable transportation network for the movement of components and goods during (but not limited to) the early years of the project (i.e. Pre-MOLF). The infrastructure that the port boasts necessitates that it must become an active player in the delivery of the project and that Horizon demonstrates their commitment to the area by:
  - a) Securing the future of the Port of Holyhead for at least the next 25 years, guaranteeing a significant part of Wales' and the UK's logistics and transport chain.
  - b) Retain and maximises the benefits of major investment such as the Wylfa Newydd development.
  - c) Has an impact across the whole of North Wales, supporting future manufacturing and supply chain growth.
- 2.4.6 Further benefits of the use of Holyhead Port are detailed within the 'Economic Development – Supply Chain' LIR chapter.

## **2.5 Brexit**

- 2.5.7 This chapter and the work done to date has not taken into consideration the potential implications of Brexit on the island's transport networks.

### **3.0 Impacts and Evidence Base**

- 3.1 This section highlights impacts on traffic and transport issues. The Joint Anglesey / Gwynedd Local Development Plan 2011-2026 clearly recognises that new developments, such as WNP must not 'result in unacceptable adverse economic, social, linguistic or environmental impacts'<sup>5</sup>. It states the 'adverse effects of WNP... are avoided or mitigated and where appropriate legacy benefits are provided'<sup>6</sup>. This section highlights the impacts on the highway issues resulting from the project. Horizon's submission to PINS recognises potential highways issues and have mitigated by providing A5025 improvements. However, the IACC believes there are much further and wider impacts on the highway network, which are explained in detail in the sections below.

### **3.2 Transport Evidence**

- 3.2.1 IACC has undertaken a full review of the WNP DCO transport evidence contained within the Traffic and Transport Chapter<sup>7</sup> in Volume C of the Environmental Statement, the Transport Assessment<sup>8</sup> and other relevant documents within Appendix C. The transport evidence assesses the impacts of the development for three different years – 2020 (completion of preparatory works and opening year of A5025 offline highway improvements [bypasses]), 2023 (peak construction) and 2033 (peak operation). The environmental impact assessment is based on traffic flows, journey times, accidents and safety and driver stress and considers the residual effects expected to remain assuming mitigation measures are applied.

### **3.3 The baseline review sets out the following:**

- a) 2016 Average Annual Daily Traffic (AADT) two-way traffic flows at 42 road sections.
- b) 2016 AM and PM peak hour one-way journey times at 42 road sections, concluding that no significant delays or queuing at junctions were observed, although there is comparison to off peak journey times to corroborate this, and also to compare the situation of peak hours of the development traffic. The only observation of congestion is at the A55 Britannia Bridge.
- c) Summary of personal injury accident (PIA) between 2011 – 2015, concluding that the percentage of fatal accidents is double the national average at 2%, and serious and slight accidents are less than the national average.
- d) Assessment of levels of driver stress experienced in the AM and PM peak hours at 42 road sections in either direction. High levels of stress are identified on the approach to Britannia Bridge, on the A5 at Valley Crossroads, on sections of the A5025 between the Valley Crossroads and the Wylfa Newydd site, on the A5025 between Tregele and the A55 J5, sections of the B5111, B5109, the A55 between and on approaches to J3 and J4. Driver stress is defined where changes in speed and vehicular flow

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<sup>5</sup> Joint Anglesey/Gwynedd LDP 2011-2026, 2017, p.85. [\(Link\)](#)

<sup>6</sup> Joint Anglesey/Gwynedd LDP 2011-2026, 2017, p.29. [\(Link\)](#)

<sup>7</sup> Examination Library Reference – APP-[089]

<sup>8</sup> Examination Library Reference – APP-[101]

are encountered through congestion or queuing at junctions, or where roads are substandard with inadequate signing, poor visibility and narrow lanes, which contribute to low vehicle speeds and increases in drivers' fear of accidents.

3.3.1 The assessment of traffic impact has been based on:

- a) Percentage increase in traffic flows as a result of the development: 10% increase at sensitive locations (e.g. adjacent to schools, churches) and 30% increase in non-sensitive locations. Not all road sections have been assessed, and there is no assessment of the situation during the peak hour(s) of the development traffic flows, nor during the peak holiday season.
- b) Percentage increase in journey times as a result of the development. This considers the A5025 where there are highway improvements and the A55 Britannia Bridge. There is no assessment of the situation during the peak hour(s) of the development traffic flows, nor the peak holiday season.
- c) Predicted accidents for those route sections that are expected to experience significant changes in the peak hour scenarios.
- d) Driver stress on the 42 road sections is not expected to change.

3.5 IACC has drawn the following conclusions on general impacts.

**3.5.1 Positive Impacts**

3.5.1.1 The WNP DCO transport evidence has identified that the A5025 from Valley to the WNP site will experience a significant increase in the volume of traffic as a result of the WNP project, including a considerable percentage of large vehicles and could include the need for AIL deliveries. The route has several pinch points and environmental issues along the route. Additionally the crossroads signalised-junction at Valley is considered sensitive to a significant increase in traffic level. The evidence shows that the percentage increase in HGVs would be significant and would have a detrimental effect on receptors that are sensitive to changes in traffic flow such as schools and villages. Mitigation in the form of bypasses (or Off-line highway improvements) has been identified to address the impacts on the villages. This results in a positive impact of reducing traffic through these villages. The DCO transport evidence base also concludes that this would result in a reduction in journey times, accidents and driver stress.

3.5.1.2 IACC agrees that there are positive benefits to the communities which will be bypassed by the A5025 Off-line improvements.

**3.5.2 Neutral Impacts**

3.5.2.1 The Traffic and Transport Chapter of the ES has not identified any other impacts, therefore considers there to be neutral impacts. IACC does not agree with this.

### 3.5.3 Negative Impacts

- 3.5.3.1 The majority of the Island's roads will experience an increase in traffic as a result of the development related traffic which could have a negative impact on environmental aspects for local communities, businesses, and visitors, such as increased severance, noise, air pollution, safety, etc.
- 3.5.3.2 In addition, the Traffic and Transport Chapter of the ES does not include an assessment of the situation during the peak hour(s) of the development traffic flows peak hours, nor does it consider the situation during the peak holiday season.
- 3.5.3.3 Horizon recognise that the rise in traffic and HGVs flows will be large and they assess 'the magnitude of change is medium but using professional judgement the significance of the effect is considered to be minor adverse.'<sup>9</sup> From a tourism perspective, this is highly questionable as ease of access is the key to destination choices. Increased traffic as a result of Wylfa Newydd will strain tourist tolerances and may lead tourists to opt to holiday and day trip elsewhere. Perceptions of road congestion are likely to exert similar impacts to actual congestion. Indeed 'Businesses and visitors are more likely to be impacted by the perception of congestion'<sup>10</sup> as first time and returning visitors and day-trippers choose to go elsewhere.
- 3.5.3.4 Construction Traffic Management Plans will be key to alleviating traffic flow issues. Even with these, there will be significant delays and congestion, impacting on actual and perceived visitor experiences and perceptions of Anglesey and North Anglesey in particular.
- 3.5.3.5 The IACC believe that traffic generated by Wylfa Newydd (and the perception of congestion) has not been given adequate consideration by Horizon in their DCO application. This will have a negative impact on tourism. Mitigation of these impacts is addressed in the tourism chapter.
- 3.5.3.6 Specific negative impacts are identified in the following sections and relate to the following categories:
- a) Deliverability
  - b) Sustainable Transport
  - c) Control
  - d) Network Resilience
  - e) Road Safety

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<sup>9</sup> Examination Library Reference APP-[090] C-3-34, p3.5.19.

<sup>10</sup> Hinkley Point C Local Impact Report p.177 ([Link](#))

## **3.6 Deliverability**

### **3.6.1 Early Years Strategy**

3.6.1.1 The assessment work in the Transport Assessment (TA) assumes that a minimum of 60% (with a target of 80%) of all construction materials will be delivered by sea via the Marine Off-Loading Facility (MOLF). The IACC fully supports water-borne transport over road transport at all stages of the project, as noted in EN-1<sup>11</sup>. Notwithstanding this position, any delay to the delivery of the MOLF (as is evident at Hinkley Point C [HPC]), or if Horizon does not meet this target, will inevitably have a significant and unacceptable impact on the local highway network. This impact will become further exacerbated by any delay to the delivery of the A5025 highway improvements.

3.6.1.2 The IACC has consistently and repeatedly emphasised the need for an Early Years Strategy (the construction period for the Associated Developments, MOLF, A5025 improvements, Site Campus Phase 1, Site Grading, Earthworks and Excavations) which sets out the management and planning of construction traffic movements. Consideration shall also be required for scenarios whereby there is a delay to the construction/completion of such components as, but not limited to:

- a) The A5025 On-line Highway improvements;
- b) The A5025 Off-line Highway improvements;
- c) The Marine Off-Loading Facility (MOLF);
- d) Dalar Hir Park & Ride; and
- e) Parc Cybi Logistics Centre.

3.6.1.3 There are currently a number of sections along the A5025 route that are particularly sensitive to any increase in traffic without the A5025 Off-line improvements. These include:

- a) Valley Cross roads: traffic signal controlled crossroads with sensitivity to the impacts of noise, vibration and air quality;
- b) Llanfachraeth: poor visibility, sensitivity to vehicles passing in opposite directions through the village, including impact of noise and vibration;
- c) Llanfaethlu: two existing substandard bends near the Black Lion pub and the Old Coffee Shop, as well as the presence of highly sensitive receptors, such as Ysgol Rhyd Y Llan; and
- d) Cefn Coch: two existing substandard bends in Llanrhwyrus between Llanrhyddlad and Cefn Coch.

3.6.1.4 The IACC has further concerns that Horizon might increase the number of HGV movements (daily or monthly) on the road network in an attempt to recover any programme delay. Such a scenario is currently evident at HPC, whereby the developer recently applied to uplift the quarterly maximum 500no HGV movements by 50% as a result of a delay to the delivery of the jetty, with the local community raising significant concerns<sup>12</sup>.

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<sup>11</sup> Overarching National Policy Statement for Energy (EN-1) ([Link](#))

<sup>12</sup> Hinkley Point in 2018 - Five reasons why people in Somerset are worried about the nuclear power station ([Link](#))

3.6.1.5 To address these concerns, IACC requires a threshold of vehicle numbers, split into HGVs, buses and light goods vehicles to be identified by Horizon and submitted to the IACC for agreement for the following scenarios during the Early Years' period:

- a) Before opening of the Off-line A5025 improvements; and
- b) Before opening of the MOLF.

Horizon should submit to the IACC for agreement maximum limits for HGVs and buses, for all years on a daily and monthly basis and during AM and PM network and development peak hours.

3.6.1.6 Threshold caps on vehicles will be identified for these periods, which will restrict construction traffic numbers. This will need to be identified within the CoCP.

3.6.1.7 The imposition of these controls (subject to agreement) will make this issue acceptable to the IACC, as well as ensuring the interests and safety of local residents whom currently reside adjacent the A5025 are safeguarded. These included residents located at Valley, Llanynghenedl, Llanfachraeth, Llanfaethlu, Llanrhyddlad, Tregele, etc. whom would be directly impacted by construction traffic.

### **3.6.2 Dalar Hir Park & Ride**

3.6.2.1 There remains significant concerns with regard to potential flood risk impacts at the site and the implications that these may have for the operational phase of the facility as there would be insufficient parking available for the construction workers. This substantiates the IACC's concerns regarding deliverability and the lack of resilience and contingency planning within the strategy.

3.6.2.2 IACC require this impact to be addressed through the identification of contingency planning for additional parking, such as the Park & Shares that are being progressed by IACC, Welsh Government and Gwynedd Council. Providing contingency planning such as this will make this issue acceptable to IACC.

3.6.2.3 There are other concerns regarding the traffic impacts at the Park & Ride access and adjacent junctions, and these discussed further with the Network Resilience section.

## **3.7 Sustainable Transport**

### **3.7.1 Construction Worker Car Sharing Strategy**

- 3.7.1.1 The IACC welcomes the principle of car sharing (sustainable travel) and the provision of a Park & Ride facility on the Island, however has concerns regarding the car share targets, as well as the potential consequence of workers car sharing.
- 3.7.1.2 The information submitted within the DCO documents demonstrates that parking provision levels are fully dependent on the car share ratios which have been identified. Reference has been made by Horizon to the construction of Sizewell B nuclear power station and its apparent successful level of car sharing. However, IACC is of the opinion that as Sizewell B was constructed in the 1990s, car-ownership levels and worker travel patterns have changed significantly since then. Studies<sup>13</sup> have shown that by the year 2021, it is expected that the number of cars per household will have increased by approximately 40% compared to the year 1991.
- 3.7.1.3 The car share ratio for the 1,900 spaces at Dalar Hir at 1.5 persons per car implies that there will be potentially be 50% single occupancy vehicles. If this percentage increases and the car share ratio reduces, there will be insufficient spaces available. For example:
- a) 1.4 car share ratio will require 2,006 spaces;
  - b) 1.3 car share ratio will require 2,161 spaces; and
  - c) 1.2 car share ratio will require 2,341 spaces.
- 3.7.1.4 Failure to achieve the car share targets will result in overspill parking, either within the car park itself which would result in a breach of the parking limit, or on the local road network which would result in road safety issues and an unacceptable impact on local communities such as Bodedern and Bryngwran.
- 3.7.1.5 From analysing the car sharing statistics<sup>14</sup> for the HPC project, it is evident that car sharing ratios have improved, however are still significantly below the targets as set out within the DCO. Such statistics are exemplified by the largest Park & Ride facility associated with the HPC project, which currently provides 920no spaces. As of July 2018, of the 428 workers arriving at site, 400 (84%) were car drivers and 58 (12%) were car passengers. This demonstrates the challenges of achieving a car share factor of 2.0 project wide. In addition to this, delays to the delivery of the Cannington Park & Ride resulted in the need to provide temporary parking to accommodate the scale of demand.
- 3.7.1.6 To-date, Horizon has relied on the assumption that workers will be willing to walk or drive to another workers place of residence to car share, based on living close to each other or directly en-route. The IACC disagrees with this assumption due to it being unrealistic and overambitious; whereas the Authority believes the combination of the estimated geographic distribution of

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<sup>13</sup> Car ownership in Great Britain, RAC Foundation (October 2008) ([Link](#))

<sup>14</sup> Sedgemoor Transport Review Group ([Link](#))

the workforce, the churn of workers over the construction period and the emphasis on car sharing imposed by Horizon will inevitably lead to workers making informal arrangements (or formally via the proposed database) to meet each other near the strategic road network. This will result in indiscriminate/anti-social 'fly-parking' which can cause road safety hazards, traffic delay to local transport, damage to edge of carriageway, as well as undue stress to local residents. It is currently envisaged workers will meet near such locations as junctions 6, 7 and 8 of the A55, including other areas on the mainland, to car share the onward journey either to Dalar Hir Park & Ride or directly to the Wylfa Newydd Development main site. This reflects current practice by workers car sharing on the island. Such communities that will be directly impacted by 'fly-parking' include Llanfairpwll, Menai Bridge, Gaerwen and Llangefni, as well as communities in North Anglesey such as Amlwch, Cemaes, Llanfechell, Carreglefn and Tregele.

3.7.1.7 The IACC, the Welsh Government and Gwynedd Council have worked collectively to identify appropriately located Park & Share sites on the Island and mainland that can supplement Horizon's Integrated Transport Strategy, enabling workers to meet up, leave one car (or more) and car share the onwards journey to the Dalar Hir Park & Ride or the main site. These Park & Share facilities are located near A55 Junctions 7 and 8 and are currently being brought forward through the planning application process. Discussions with Horizon on this matter have resulted in agreement in principle by Horizon that the proposal can complement their transport strategy suggesting that S.106 funds could be allocated to the delivery of the Park & Share sites should the car share strategy fail to achieve its targets or fly-parking becomes evident. Further consideration and discussion is required between Horizon and IACC to discuss the funding, delivery and management of the sites.

3.7.1.8 The IACC consider that the Park & Share facilities are needed for contingency planning and are required as part of the Horizon delivery package. Providing contingency planning such as this will make the car sharing issue acceptable to IACC.

### **3.7.2 Shuttle Bus Service**

3.7.2.1 IACC has three main concerns regarding the shuttle services:

- a) Fly parking around bus stops due to construction workers driving to convenient bus stops, particularly those near the site. This would result in road safety issues and have an impact on the local community.
- b) Hail and ride services whereby workers can stop a shuttle service anywhere on its route. This would result in road safety issues.
- c) Inappropriate bus routeing and bus stops which would result in road safety issues and impacts on the local community.



### 3.7.2.2 *Fly parking*

3.7.2.3 Evidence from the HPC project highlights that there is an issue with pre/post weekend fly parking near to bus stops. Travel-mode statistics indicate 90% of non-home based travel is by shuttle bus, which is considerably higher than what was anticipated in the EDF Transport Assessment. This is due to a higher proportion than estimated of workers locating in Bridgewater, nearer to the site, and a lower proportion living further afield.

3.7.2.4 Information within the Integrated Transport Strategy states that those living within a short distance (up to 600m) of a shuttle bus route will be required to use the shuttle bus services. Workers failing to adhere to their agreed and chosen route to work (e.g. bus route) will be refused entry through appropriate enforcement measures and potentially be given a formal warning.

3.7.2.5 From recent discussions with Horizon, it is understood that every worker will be allocated a mode of travel which will apply from the beginning of construction to ensure that Integrated Transport Strategy travel behaviours and patterns are implemented from the commencement of the construction works. It is also understood from Horizon that workers would be allocated a bus stop based on the location of their place of residence. Horizon has identified that these requirements will be included in the CoCP. However, Horizon has also indicated that an enforcement system such as that implemented at HPC (three 'strikes' and out) will not be implemented.

3.7.2.6 IACC welcomes Horizon's approach to allocating workers' mode of travel, but is concerned that without a system of enforcement, there will be no means to control workers' travel behaviour. There is a lack of detail provided in relation to the proposed monitoring and enforcement for indiscriminate parking, which will result in local communities suffering undue inconvenience resulting from un-social and inconsiderate fly-parking by construction workers. This sensitive issue has been highlighted in previous press releases in relation to the HPC project<sup>15,16</sup>. Robust systems need to be in place to ensure that workers adhere to their allocated mode of travel and for those travelling by bus, that they use the allocated bus stop. IACC requires enforcement procedures to be identified and that these are included in the CoCP. In addition, smart ticketing systems need to be part of the shuttle bus package which would ensure that workers are only able to get on the bus at their allocated bus stop.

### 3.7.2.7 *Hail and Ride*

3.7.2.8 The IACC opposes a 'hail and ride' service on the road network on the basis of road safety and the potential for fly-parking.

3.7.2.9 From recent discussions with Horizon, IACC understands that hail and ride services are not part of the proposals and that Horizon will not be

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<sup>15</sup> Bridgewater MP Ian Liddell-Grainger pledges to take action against fly-parking Hinkley Point workers ([Link](#))

<sup>16</sup> Frustration at increase in 'fly-parking' by Hinkley C workers ([Link](#))

implementing these. IACC welcomes this response and requires this to be formally identified within the CoCP.

#### **3.7.2.10 Bus Stops and Routes**

3.7.2.11 The Horizon Integrated Transport Strategy identifies that some shuttle bus services may be express routes, such as the Holyhead, Caernarfon and Bangor services, while services around the north and east of Anglesey, such as Cemaes, Amlwch and Benllech, are likely to be 'multi-stop' services. The service routes have been identified but the bus stops are not yet defined at this stage in the proposals.

3.7.2.12 The IACC has undertaken a preliminary review of the bus stops along the proposed service routes, taking into consideration accessibility for pedestrians and cyclists, safety concerns and potential for fly parking. As a result of this exercise, IACC has identified a number of existing bus stops that may not be suitable for project without implementing improvement measures. During recent discussions, Horizon has agreed that there is a need to identify suitable bus stops and routes for use by the shuttle services and funding could be provided through the S.106 to upgrade bus stops that require improvements. IACC welcomes this response and requires this to be formally identified as part of the DCO proposal.

### **3.8 Control**

#### **3.8.1 Use of Unsuitable Roads**

3.8.1.1 As a result of Horizon's proposal to provide 1,900 parking spaces at the Wylfa Newydd main site, of which 1,100 will be available to daily commuting workers, the IACC has concerns regarding significant increases in traffic using Class II, III and Unclassified roads to access the parking spaces. Due to the rural character of Anglesey, a large number of potential unsuitable rural roads could be used by construction workers to access/egress the WNP site during shift start / end times. This would lead to issues such as road safety concerns, increase in potential vehicle collisions, increase in traffic congestion, speeding concerns, edge of carriageway damage, etc. Such communities in the North Anglesey area whom would be directly impacted include (but not limited to) Tregele, Llanfechell, Carreglefn, Rhosgoch, Mynydd Mechell, Llannerch-y-medd, Rhosybol, Cemaes, Burwen, Llanfigael, Bodedern and Llanddeusant.

3.8.1.2 In addition to rural lanes, the IACC has raised concerns to the use of the A5025 eastern corridor by construction workers to access the WNP site. Communities directly impacted by potential 'rat-runs' along this corridor include Pentraeth, Benllech, Brynrefail, Cerrig-Mân, Amlwch, etc.

3.8.1.3 To enable effective monitoring of the potential rise in traffic on Class II, III and Unclassified roads, the IACC are currently in the process of gathering baseline traffic data of roads that could be potentially used as 'rat-runs' to the WNP, as identified within the IACC's previous letter dated 25<sup>th</sup> May 2018. The IACC are keen to agree upon the scope of the roads where Horizon is to monitor

usage and condition during the construction stage in order to be able to assess whether there has been increased rise in use as a result of the construction of Wylfa Newydd.

- 3.8.1.4 From the monitoring, should it be evident that unsuitable roads are used by the construction workers, the IACC would expect appropriate mitigation measures to be provided through the S.106 agreement as well as appropriate disciplinary action through the CoCP.

### **3.9 Network Resilience**

#### **3.9.1 Damage to the Highway Network**

- 3.9.1.1 Despite the construction route being specified as the A55/A5025, there remains the risk that other sections of the highway network will experience higher levels of traffic, in particular significant increase in HGVs. These include all highway links between the strategic highway network (A5/A55/A5025) and Associated Development sites.

- 3.9.1.2 This change in volume and type of vehicle will have a detrimental impact on the condition of the roads affected by the development in terms of:

- a) road surface condition, e.g. cracking, potholes, etc.
- b) road markings, e.g. reduced retro-reflectivity
- c) Carriageway surface/structural deterioration

- 3.9.1.3 The existing condition of the A55 J2, 3 and 4 roundabouts are in a deteriorating condition, however they do not currently present a hazard to road users. However, with the expected increase in HGV traffic as a result of the project, this may have a detrimental impact on the condition of the highway network. Evidence from the HPC project confirms that:

- a) roads were improved in advance of construction;
- b) road condition and deflectograph surveys were undertaken prior to commencement and undertaken on a regular basis during the construction programme with maintenance carried out where required; and
- c) a final deflectograph survey will be undertaken at the end of the construction roads.

- 3.9.1.4 During recent discussions with Horizon, it was agreed that road condition surveys need to be undertaken and to agree upon a road repair strategy that will identify road improvement requirements in agreement with IACC. The IACC will require a deflectograph survey to be undertaken at agreed intervals, as has been implemented as part of the Hinkley Point C project. This needs to be included within the CoCP.

### **3.9.2 Capacity of A55 Junction 3 & 4 interchange roundabouts**

- 3.9.2.1 The IACC has reviewed the DCO Transport Assessment and Appendix H reports on junction capacity assessment modelling for a number of junctions. The assessment does not present the junction capacity model output for the existing Junction 3 A55 grade separated dumbbell roundabouts, the proposed Dalar Hir P&R roundabout and the existing Junction 4 A55 grade separated dumbbell roundabouts. The information provided is insufficient to properly understand the operation of the Park & Ride site and the potential for queuing back onto the public highway and the implications that this would have on the access roundabout (the existing Bodedern Roundabout) and on Junction 4.
- 3.9.2.2 Additionally, there are concerns that the traffic flows at the Dalar Hir junction shown in *Appendix C2-3 Traffic Flows* do not reflect the demand for the Park & Ride in terms of car and shuttle buses.
- 3.9.2.3 Horizon has confirmed that there are anomalies with the traffic model results which are being reviewed. Further work is required by Horizon to demonstrate that there will be no operational issues at the Park & Ride site that will affect the capacity, safety and resilience of the adjoining highway network. IACC requires provision of the revised traffic models and the junction models to assess the proposals and the results.
- 3.9.2.4 The IACC notes that the roundabout proposed to provide access into the Park and Ride site would become part of the local highway network as existing roads feed into the junction configuration. The IACC has undertaken a review of Horizon's design and has concluded that it raises major safety concerns related to the realigned London Road approach to the junction in terms of horizontal radius and the stopping site distance (SSD) which do not comply with the highway standards set out in the design manual for Roads and bridges (DMRB). In addition, the reconfiguration of the access to the existing VOSA vehicle testing station junction has road safety issues with conflicts of movement and with visibility splays below standard. The IACC has identified alternative layout solutions for the proposed access roundabout, with further detail included within the Dalar Hir (Park & Ride) LIR chapter.

### **3.9.3 Resilience of Britannia Bridge**

- 3.9.3.1 The IACC re-iterates its position with regards to the resilience of Britannia Bridge. As set out in the Context section, the Bridge is a pinch point on the A55 and at peak periods there are capacity issues which result in traffic queuing. Adverse weather conditions and/or road traffic incidents have a significant impact on both the Britannia Bridge and Menai Bridge (diversion route) resulting in closures. This was recently exemplified, whereby North Wales Police prohibited vehicular traffic on Britannia Bridge for over eight hours due to a road traffic collision. Disruption to the road network was still evident many hours after re-opening of the bridge, with particular impact to local residents of Llanfairpwll, Menai Bridge and beyond.
- 3.9.3.2 The IACC is concerned about the diversion of construction traffic onto the Menai Bridge if the Britannia Bridge is closed which would have a detrimental

impact on the local community. IACC require identification of procedures to be in place in the event of bridge closure which will need to be agreed with IACC and included in the CoCP. This will include, for example, holding HGVs at the Logistics Centre.

### **3.10 Road Safety**

#### **3.10.1 A5025 between Cemaes and Amlwch (Betws Bends)**

3.10.1.1 HNP estimates a 40% increase in traffic volumes during peak construction period (PM peak 2023) on the A5025 between Cemaes and Amlwch. Although this implies a relatively moderate increase in traffic flow, the IACC would note the significant increase in large vehicles (shuttle buses) expected at shift start / end times. This raises road safety concerns when taking into account the poor horizontal and vertical alignment of this particular stretch of the A5025, as well as a lack of forward visibility and lack of road verge. Local elected members and local residents of North Anglesey (such as Amlwch, Cemaes, Burwen, etc.) have continuously raised similar concerns.

3.10.1.2 The IACC has consistently highlighted the need for road improvements to this section of the A5025, which would introduce key benefits to the projects such as:

- a) Improve the road to a standard where it could be considered as an alternative emergency route in the event of an incident on the A5025 construction traffic route;
- b) Reduce the risk of Horizon shuttle buses colliding with each other;
- c) Potential to link the improvements with cycling provision; and
- d) Improved safety for non-motorised users (NMU's) to mitigate against the increase in large vehicles, e.g. Horizon shuttle buses.

#### **3.10.2 Accident Analysis**

3.10.2.1 The accident analysis within the TA has concluded that there are various Personal Injury Accident (PIA) cluster spots on the local and strategic highway network relevant to the proposed application. Notably the analysis covers the period 2011-2015. The analysis concludes that there is forecast to be up to a 26% increase on the A5025 at Valley for example. The analysis states that an increase in magnitude of accidents such as this is considered to be 'negligible' and hence no mitigation is proposed.

3.10.2.2 However, in the context of what is proposed in terms of an exponential increase in HGV movements over a period of 9 years, this is considered to be a significant oversight. The additional number of large, slow moving junctions passing through the network should not be underestimated in the context of the additional highway risk that they pose in terms of worsening congestion, driver risk / frustration and the increased propensity for overtaking / hazardous manoeuvres.

### **3.10.3 Cumulative impact (North Wales Connection Project)**

- 3.10.3.1 The construction traffic from the National Grid Connection Project should be included within the traffic modelling irrespective of the level of traffic, as it will have a cumulative impact. To elaborate further, 20 HGVs per hour per direction would equate to 40 HGVs two-way movements, or 480 HGVs over a 12 hour period, which is not a low level of traffic and can have a capacity impact on roads and junctions and a direct environmental impact on communities located alongside the construction routes, or users of those routes. These included residents located adjacent the A5025 at Valley, Llanynghenedl, Llanfachraeth, Llanfaethlu, Llanrhyddlad, Tregale, etc. whom would be directly impacted by construction traffic before and after the opening of both the Off-line improvements and the MOLF.

## **4.0 Policy Position**

- 4.1 The Local Planning Policy Position in relation to the Transport implications of the Wylfa Newydd DCO has been identified based on the JLDP and the Wylfa Newydd SPG.

### **4.1.1 Joint Local Development Plan**

- 4.1.1.1 The following JLDP policies are relevant to IACC's Policy Position in relation to Transport impacts of the DCO application.
- 4.1.1.2 JLDP strategic objectives include SO3 which sets out the requirement for the Plan to "Improve and maintain safe, efficient, high quality, modern and integrated transport networks to employment, services and education/training facilities particularly by foot, bicycle and public transport, thus reducing where possible the number of journeys in private cars".
- 4.1.1.3 *The DCO proposals rely predominantly on travel by car, car share and bus shuttle services to be provided by Horizon to transport workers to the main site. There is limited consideration for improvements to the pedestrian and cycle infrastructure to encourage journeys by foot or cycle.*
- 4.1.1.4 Infrastructure Provision Policy ISA1 identifies a range of purposes for which financial contributions can be sought, where appropriate, including transport infrastructure in recognition that new development will often require new or rely on existing infrastructure, services and facilities to make proposals acceptable in land use planning terms.
- 4.1.1.5 *It is acknowledged that Horizon is providing financial contributions to improve infrastructure and transport services where appropriate. Agreement on the extent of this is yet to be reached.*
- 4.1.1.6 Strategic Policy PS 4: Sustainable Transport, Development and Accessibility states that development will be located so as to minimise travel. The Councils will support improvements that maximise accessibility for all modes of transport, but particularly by foot, cycle and public transport. This will be achieved by securing convenient access via footways, cycle infrastructure

and public transport where appropriate, thereby encouraging the use of these modes of travel for local journeys and reducing the need to travel by private care. The policy also sets out how by working with their partners, the IACC will endeavour to improve accessibility and seek to change travel behaviour.

- 4.1.1.7 *The DCO proposals rely predominantly on travel by car, car share and bus shuttle services to be provided by Horizon to transport workers to the main site. There is limited consideration for improvements to the pedestrian and cycle infrastructure to encourage journeys by foot or cycle.*
- 4.1.1.8 Strategic Policy PS 5: Sustainable Development states that development proposals will be supported where it is demonstrated that it is consistent with the principles of sustainable development. All development proposals should reduce the need to travel by private transport and encourage the opportunities for all users to travel when required as often as possible by means of alternative modes, placing particular emphasis on walking, cycling and using public transport.
- 4.1.1.9 *The DCO proposals place an emphasis on car share and bus shuttle services but there is insufficient evidence to support the deliverability of their proposals.*
- 4.1.1.10 Strategic Policy PS 9: Wylfa Newydd and Related Development sets out the Councils' policy requirements for the DCO proposal. Criterion 3 of PS9 identifies the need to have regard for Policy PS4 and minimise adverse transport impacts to an acceptable level during all stages of the development. Proposals should where feasible make a positive contribution to transportation policy objectives in the locality, and should include multi-modal solutions and investment that encourages travel by public transport, walking and cycling and other sustainable forms of transport.
- 4.1.1.11 *The DCO proposals place an emphasis on car share and bus shuttle services but there is insufficient evidence to support the deliverability of their proposals.*
- 4.1.1.12 Criterion 12 of Policy PS9 requires that all proposals shall be appropriately serviced by transport infrastructure including public transport and shall not have adverse impacts on local communities and tourism and this shall be demonstrated in a transport assessment. Where there is insufficient transport linkage or the road network does not have sufficient capacity to accommodate the level of traffic which will result from any development or an adverse impact is predicted, appropriate improvements to the transport network and the provision of sustainable transport options shall be provided to mitigate the impacts.
- 4.1.1.13 *The DCO proposals include infrastructure improvements to accommodate the predicted levels of traffic. There is an emphasis on car share and bus shuttle services but there is insufficient evidence to support the deliverability of their proposals.*

- 4.1.1.14 Strategic Policy PS 12 sets out the criteria for the Wylfa Newydd Park and Ride and Park and Share Facilities. This includes the location along or close to the A5/A55 close to Centres where provision for travel to the site by sustainable means, including public transport and cycling, can be provided. In other locations along the A5/A55 where it is part of a comprehensive approach to mitigating the transport effects of the Project it should take account of the Councils' preference to consider sites closer to Centres. The proposals should make provision for new and enhancement of existing pedestrian and cycle paths and improvement to public transport services. Negative impacts of the proposals on the amenity of the local community, including access and egress, should be mitigated.
- 4.1.1.15 *See the IACC's response to the Dalar Hir Park and Ride Chapter regarding the justification of the selection of the Dalar Hir site. The proposed Park & Ride location does not benefit from opportunities to walk or cycle there. The evidence provided is insufficient to determine whether there will be impacts on the amenity of the local community.*
- 4.1.1.16 *No Park & Share proposals have been made despite the Councils' requests.*
- 4.1.1.17 Part 2 Transfer between Transport Modes of Policy TRA 1 'Transport Network Developments in the JLDP in order to facilitate the transfer between transport modes to help minimise travel demand and reduce car dependency in criterion (v) support facilities for park and share in appropriate locations within or adjacent settlements on the strategic highway network.
- 4.1.1.18 *No Park & Share proposals have been made despite the Councils' requests*
- 4.1.1.19 Policy TRA 4 Managing Transport Impacts where appropriate seeks to ensure that proposals should be planned and designed in a manner that promotes the most sustainable modes of transport having regard to a hierarchy of users.
- 4.1.1.20 *The DCO proposals rely predominantly on travel by car, car share and bus shuttle services to be provided by Horizon to transport workers to the main site. There is limited consideration for improvements to the pedestrian and cycle infrastructure to encourage journeys by foot or cycle.*

#### **4.1.2 Wylfa Newydd Supplementary Planning Guidance**

- 4.1.2.1 The Guiding Principles (GP) for Transport are set out in GP15 of the Wylfa Newydd SPG, summarised as follows.
- 4.1.2.2 GP15 identifies the need for robust assessment of the movement of construction workers and the delivery of materials, plant and equipment, and a logistical approach, which maximises the use of rail, and sea for deliveries and sustainable transport for workers. Highway improvements are required to minimise congestion, ensure safety and minimise environmental impacts. IACC expect proposals to be in place prior to the commencement of activities



that would otherwise lead to negative effect. Sustainable transport should be supported by travel planning and measures to facilitate and promote car sharing, walking, cycling, public transport and minimise travel by private car share and unauthorised or 'fly' parking in the vicinity of the Wylfa Newydd site. Monitoring and management of traffic movements and unauthorised activities is a requirement.

- 4.1.2.3 *There is insufficient information provided in the DCO proposals to determine whether the Guiding Principles are addressed.*

## **5.0 Gaps in Information**

- 5.1 The following gaps in information have been identified.

### **5.2 Periods of assessment**

- 5.2.1 There is no assessment of the situation during the peak hour(s) of the development traffic flows peak hours, or the situation during the peak holiday season.

## **5.3 Deliverability**

### **5.3.1 Early Years Strategy**

- 5.3.1.1 To-date, Horizon has not demonstrated with clarity how the project components will be programmed/constructed in order to ensure the Project:

- a) Does not have a negative impact on the existing condition of the A5025 (or any other road) prior to the A5025 online and offline improvements
- b) Avoids the potential significant disruption to local residents located in the vicinity of the A5025 and its construction programme.
- c) Does not impact upon the highway network during any overlap with other NSIP (i.e. North Wales Connection Project).

- 5.3.1.2 The IACC deems that the Construction Vehicle Profile<sup>17</sup> within the DCO Transport Assessment is not of a sufficient quality or precision to enable the undertaking of such analysis.

- 5.3.1.3 Consideration has not been given to the impact of an increase in the number of HGV movements (daily or monthly) on the road network in an attempt to recover any programme delay, as evidenced at HPC.

- 5.3.1.4 To avoid this potential impact, Horizon should undertake Sensitivity Analysis to identify traffic volumes and impacts during different stages of the Wylfa Newydd early years construction period (i.e. pre-MOLF). From this analysis, the IACC seeks to agree upon acceptable volumetric thresholds/caps for maximum traffic levels along the A5025 for the early stages of the project. Such thresholds/caps would ensure that Heavy Duty Vehicle (HGV and

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<sup>17</sup> Examination Library Reference APP-[101] Figure 7-6 Construction vehicle profile

Shuttle Bus) traffic would not introduce unacceptable levels of congestion, delay and undue environmental impact on sensitive receptors.

### **5.3.2 Valley Crossroads (A5/A5025/B4545) Junction**

- 5.3.2.1 Following the opening of the Valley bypass, an assessment of the signal configuration and timings will be required as part of the stopping up of the northern (A5025) highway arm. The IACC also seeks further information and discussion on introducing suitable crossing provision for pedestrians across the frontage of the Petrol Filling Station (PFS) to the existing bus stop shelter along the A5. This includes the provision of a new kerbed footway in front of the PFS forecourt.
- 5.3.2.2 The IACC seeks further information on what mitigation will be provided to cyclists that will be using the existing cycle link provided between the proposed roundabout and A55 Junction 3.

### **5.3.3 Dalar Hir Park & Ride**

- 5.3.3.1 More information is required on the potential flood risk impacts at the site and the implications that these may have for the operational phase of the facility.

## **5.4 Sustainable Transport**

### **5.4.1 Car Sharing**

- 5.4.1.1 Horizon has not submitted evidence to date which demonstrates that a car share factor of 2.0 project wide is achievable and realistic. From analysing the car sharing statistics<sup>18</sup> for the HPC project, it is evident that car sharing ratios have improved, however are still significantly below the targets as set out within the DCO. Such statistics are exemplified by the largest Park & Ride facility associated with the HPC project, which currently provides 920no spaces. As of July 2018, of the 428 workers arriving at site, 400 (84%) were car drivers and 58 (12%) were car passengers. This demonstrates the challenges of achieving a car share factor of 2.0 project wide.
- 5.4.1.2 Horizon has failed to consider other constraints associated with a car sharing strategy, which include concerns by workers over safety of cars when meeting at a common location, as well as cultural factors i.e. independence and associated lack of convenience, flexibility and reliability.
- 5.4.1.3 The IACC is concerned about the lack of contingency planning should the incentives prove insufficient to encourage car sharing, with the proposed disciplinary action for breach of car sharing being unrealistic as the construction programme will inevitably be argued by Horizon to take priority over the car-sharing strategy. This is particularly the case with workers who may indiscriminately park within walking distance of the site (i.e. Tregale), or in the vicinity of the nearest shuttle bus stop to the site.

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<sup>18</sup> Sedgemoor Transport Review Group [\(Link\)](#)

5.4.1.4 The IACC believe that the provision of additional Park & Share (P&S) facilities (on a smaller scale to Dalar Hir) at strategic locations would mitigate this impact and enable more sustainable travel patterns to the Wylfa Newydd site and Park & Ride facility, as well as provide resilience, flexibility and a contingency provision to Horizon's Strategy.

5.4.1.5 The IACC is currently working in collaboration with the Welsh Government and Gwynedd Council on developing suitable sites to facilitate the Wylfa Newydd workers during the construction phase. The IACC would welcome further discussion with Horizon on the implementation and delivery of the sites.

#### **5.4.2 Bus Shuttle Services**

5.4.2.1 The lack of evidence within Horizon's documents substantiates the IACC's concerns in relation to the implementation of such a strategy. There is currently insufficient evidence on how these workers would be required to walk or cycle to the nearest pick up point to avoid potential fly parking in the vicinity of bus stops, as well as insufficient information on the Shuttle Bus operations. Horizon have failed to adequately consider and address the difficulty in procurement and day to day operation of the number of buses and drivers needed to operate the shuttle buses, whilst also take into consideration the varying demand; and a lack of detail of appropriate and safe bus stops to serve the shuttle services. Additionally, Horizon's assumption that routeing will be determined by the operator to maximise the service to workers compounds the issue as there is no indication as to how this will be agreed with and monitored by IACC.

5.4.2.2 The IACC seeks further information on the following issues:-

- a) Horizon need to demonstrate how it will enforce its underlying assumption that all workers living within 600m of a bus stop would be willing or able to walk or cycle to the nearest bus pick-up point. Without stringent measures in place, the likely impact would be indiscriminate and anti-social parking (fly-parking) in the vicinity of some bus stops, particularly those nearer to WNDA and on a Thursday when there is weekend travel available to half the workforce.
- b) There needs to be an agreement with IACC where the bus stops will be located in order to achieve safe stopping places but to also capture the workers required to travel by bus. There are a number of existing designated bus stops along the core routes which have been provisionally assessed and may be unsuitable for use as part of the project due to road safety issues. Also on the basis of road safety, IACC would not accept a 'hail and ride' concept.
- c) Risk of unreasonable assumption around the availability of number of buses and drivers – there is the potential for driver displacement i.e. loss of public and school transport bus drivers.

## **5.5 Control**

### **5.5.1 Use of Unsuitable Roads**

- 5.5.1.1 The IACC seeks clarification on how the use of unsuitable roads by construction workers will be effectively managed and monitored throughout the project. Other than the application of the CoCP compliance which will be secured through a DCO requirement, no other detail has been provided on how this impact will be managed and mitigated.

## **5.6 Network Resilience**

### **5.6.1 Capacity of A55 Junction 3 & 4 interchange roundabouts**

- 5.6.1.1 Due to the lack of traffic data of flows at the junctions, and detailed information of the operation of the car park and potential for queuing, it is not possible to properly understand the potential impacts.
- 5.6.1.2 Due to the gaps in information, the IACC is not in a position to confirm whether it is in agreement with these conclusions. The following information is required to enable IACC to better understand the capacity assessment work:
- a) Turning traffic flows for 2016, 2020, 2023 and 2033 in the reference and with-development scenarios for the roundabouts identified above; and
  - b) Junctions 9 model output for the roundabouts identified above.

### **5.6.2 Traffic Incident Management**

- 5.6.2.1 IACC has significant concerns with regards to transport network resilience in relation to the transport incident management which Horizon has failed to adequately consider for both the movement of goods and workers. The IACC seeks further discussion with Horizon, along with other stakeholders i.e. Welsh Government and Gwynedd Council, to discuss and agree the management of Wylfa Newydd construction traffic during the closure of Britannia Bridge, and any other incident on the road network via a Traffic Incident Management Plan (TIMP).

## **5.7 Road Safety**

### **5.7.1 Cumulative impact (North Wales Connection Project)**

- 5.7.1.2 National Grid is a Dependant development – i.e. development of Wylfa Newydd is directly linked to the National Grid's North Wales Connection Project. As such, Wylfa Newydd cannot occur without National Grid and hence the TA needs to account for the full impact of the National Grid proposals. The construction traffic from the National Grid Connection Project should be included irrespective of the level of traffic, as it will have a cumulative impact.

## **6.0 DCO Requirements & Obligations**

- 6.1.1 The proposed mitigation in respect of traffic and transportation has been the subject of ongoing discussion between the IACC and Horizon.

## **6.2 Overview of applicant's approach to mitigation**

- 6.2.1 The applicant has identified embedded mitigation measures comprising:

- a) Offline and online highway improvements along the A5025 between Valley and the Wylfa Newydd site
- b) The MOLF which is expected to receive at least 60% of the total material required for the Wylfa Newydd Project construction, once operational (Horizon has identified that it would seek to increase this amount up to 80% where possible).
- c) The provision of a Logistics Centre at Parc Cybi to control the volume of HGVs and Abnormal Indivisible Loads (AILs) travelling along the A5025
- d) The Site Campus for a proportion of the construction workforce (for up to 4,000 construction workers) to reduce daily traffic commuting to/from the main site
- e) The provision of up to 1,900 car parking spaces at the Dalar Hir Park & Ride which is intended to reduce the number of private vehicle movements during construction
- f) Shuttle buses to be provided between the Park & Ride and the construction sites
- g) The provision of a new bus stop on the A5 at the Park and Ride to improve access to and from local towns and villages for construction workers

- 6.2.2 The applicant has identified good practice mitigation measures comprising:

- a) Staggered shift times to reduce peak hourly flows associated with private vehicle and bus movements
- b) Dedicated shuttle bus service for construction workers living in Anglesey i.e. in Holyhead, Bangor and Caernarfon, as needed, to reduce the number of private vehicle movements to the Dalar Hir Park and Ride or the main site
- c) A delivery window on the A5025 for the construction materials from 07:00 to 19:00, Monday to Friday, with restrictions during school start and end times in advance of the A5025 Off-line Highway Improvements being operational. The applicant anticipates that deliveries may occasionally be undertaken outside of these times, but they would be limited whenever practicable
- d) Access routes for HGVs, buses and AILs to the Wylfa Newydd main site and Associate Development site has been identified as along the A55 from the mainland via Britannia Bridge to Valley and then the A5025 north. The applicant has identified that there would be some exceptions to this, for example, the north and east of Anglesey shuttle buses which would be routed via the A5025 on the eastern side of Anglesey to transport construction workers living in settlements in eastern Anglesey

to and from the Wylfa Newydd site and the Associated Development sites.

- e) Bilingual temporary signage would be erected along the A55/A5025 access routes to the proposed developments. The locations of signage would be drafted and agreed with the appropriate authorities in plain format. The purpose of the signs would be to ensure effective route management
- f) To ensure that deliveries are managed according to the capacity of the loading facilities available at the Wylfa Newydd site, a delivery booking system would be implemented
- g) The applicant will promote and encourage car-sharing between staff using appropriate internal media, for example, an intranet or app
- h) Electric vehicle charging points would be provided in the main staff car park to incentivise the use of sustainable transport, compatible with others across Anglesey and North Wales.
- i) All personnel using the Dalar Hir Park & Ride would be required to register their cars and contact details with the applicant.
- j) The applicant would monitor the effectiveness of its traffic management through a suite of indicators consistent with appropriate good practice and guidance.

### **6.3 Summary of IACC's proposed additional mitigation**

6.3.1 A summary of IACC's additional mitigation requirements are presented below.

#### **6.3.2 Park and Share Sites**

6.3.2.1 The IACC believe that the provision of additional Park & Share (P&S) facilities (on a smaller scale to Dalar Hir) at strategic locations is required to mitigate the likelihood of 'fly parking' and enable more sustainable travel patterns to the Wylfa Newydd site and Park & Ride facility, as well as provide resilience, flexibility and a contingency provision to Horizon's Strategy.

6.3.2.2 The IACC is currently working in collaboration with the Welsh Government and Gwynedd Council on developing suitable sites to facilitate the Wylfa Newydd workers during the construction phase. The IACC would welcome further discussion with Horizon on the implementation and delivery of the sites.

#### **6.3.3 Valley/A5 improved cycle link**

6.3.3.1 The IACC requests that an improved cycle link is provided between the proposed roundabout and A55 Junction 3 as a mitigation measure against the increase in HGV traffic.

#### **6.3.4 Highway Design at Associated Development Sites**

6.3.4.1 There are still a number of internal design matters and circulatory matters that need to be resolved in relation to the associated development sites, specifically the Dalar Hir Park & Ride site layout and operation. A departures

[from DRMB design standards] report has been prepared for the A5025 offline works but not for the Associated Development sites. The IACC requests that departure reports are required for all works affecting the public highway, creating roads which will become public highway or roads will be used by the public. IACC would request that the Examining Authority require departure reports to be submitted to allow proper consideration of the detailed design proposed.

### **6.3.5 DCO Requirements**

- 6.3.5.1 There is a need for a robust monitoring strategy to ensure the level of Wylfa Newydd traffic can be controlled to acceptable levels. Traffic impacts will need to be managed through a number of strategies and measures, including site-specific Travel Plans, a Freight and Waste Management Plan and a Construction Traffic Incident Management Plan.
- 6.3.5.2 The following sets out specific requirement with regards to the DCO.

### **6.3.6 Road Condition Surveys**

- 6.3.6.1 A process will need to be put in place to identify the current highway structure and surfacing conditions and monitor these throughout the construction phase in order for IACC to be compensated for any damage that is caused.
- 6.3.6.2 The IACC seek a DCO requirement to undertake surveys (i.e. deflectograph) of the existing road condition on the following sections of road at agreed intervals of the construction phase:
  - a) A55 J2, J3 and J4 roundabouts;
  - b) Wylfa Newydd entrance (end of online road works) to existing Magnox entrance;
  - c) Links from strategic highway network to any Associated Development; and
  - d) A5025 from Valley to Wylfa
- 6.3.6.3 Such surveys will assist in the identification of:
  - a) Improvements to be undertaken by Horizon prior to the commencement of construction in order to ensure resilience and minimise maintenance requirements during the course of construction;
  - b) Remedial works to be undertaken by Horizon during the power station construction phase; and/or
  - c) Remedial works to be undertaken by Horizon following the power station construction phase.
- 6.3.6.4 It is the IACC's understanding that following completion of Wylfa Newydd construction phase, the condition in which the A5025 Online and Offline sections should be maintained at this time will be agreed as part of the S278 and S38 agreements respectively.

### **6.3.7 Traffic Incident Management Plan**

- 6.3.7.1 A Traffic Incident Management Plan (TIMP) is required to provide a strategy the management of Wylfa Newydd construction traffic during the closure of Britannia Bridge, and any other incident on the road network, including the use of diversionary routes and holding areas. The TIMP should be prepared in conjunction with IACC, Welsh Government, Gwynedd Council and emergency services. The full TIMP must be agreed by IACC prior to the commencement of the DCO Works or within three months of the granting of DCO consent (whichever is sooner).

### **6.3.8 Phasing**

- 6.3.8.1 The IACC seek to secure Horizon's Phasing Strategy of developments and production and compliance of a Construction Traffic Early Years Strategy' in the DCO Requirements and have clauses included which prohibit/restrict the construction of the Wylfa Newydd project unless these elements have been completed:
- a) the MOLF must be constructed and operational prior to First Nuclear Concrete for Unit 1 (end of Q1 year 3);
  - b) the A5025 highway improvements and Park and Ride must be completed and operational by end of Q4 year 2; and
  - c) the Logistics Centre must be complete and operational by end of Q3 year 2.

### **6.3.9 Restricted Hours**

- 6.3.9.1 HGV and LGV movements will be restricted to occur between 07:00-19:00, Monday to Friday, in accordance with Horizon's TA. Exception being initial stages of construction when no deliveries would occur at school start/end times
- 6.3.9.2 There will be no Wylfa Newydd HGV construction related traffic during Sundays and Bank Holidays.

### **6.3.10 Vehicle sizes / types**

- 6.3.10.1 All HGVs associated with the construction of the Wylfa Newydd Site and associated developments are required to be Euro IV compliant.
- 6.3.10.2 Horizon will need to seek IACC approval for the bus types and standards proposed to run from Dalar Hir Park & Ride and along the A5025.

### **6.3.11 Vehicle Movements – General**

- 6.3.11.1 Horizon should submit to the IACC for agreement maximum limits for HGVs and buses, for all years on a daily and monthly basis and during AM and PM network and development peak hours. The limits will be established for



access into/out of the Wylfa Newydd site and access into/out of all Associated Development sites.

### **6.3.12 Traffic Monitoring and Management System (TMMS)**

6.3.12.1 ANPR cameras should be placed at the Wylfa Newydd site and at agreed Associated Development sites in order to record daily vehicle movements by vehicle type, including; HGVs, LGVs (related to construction / deconstruction) cars and buses.

6.3.12.2 In order to measure all vehicle movements across routes, the Traffic Monitoring and Management System specification will need to include ANPR on key routes to be identified by IACC.

### **6.3.13 Vehicle Routing**

6.3.13.1 The routing of construction HGVs will be controlled via the TMMS.

6.3.13.2 IACC will seek to condition that all Wylfa Newydd related HGVs will use agreed freight routes only.

### **6.3.14 Shuttle Bus Service**

6.3.14.1 The IACC seek a condition that all Wylfa Newydd related buses will use agreed bus routes only.

6.3.14.2 All bus stops to be agreed with the IACC, which shall also include implementing the necessary mitigation/improvement measures funded through the s.106.

### **6.3.15 Parking**

6.3.15.1 A detailed parking management phasing plan is required pre-commencement of development.

6.3.15.2 Maximum parking spaces at the Wylfa Newydd main site and the Associated Development sites are required, in accordance with the maximum traffic controls.

6.3.15.3 Minimum requirements for cycle and motorcycle parking are required.

6.3.15.4 Details of the parking management system and details of car share parking are also required.

6.3.15.5 Use of the car share parking will need to be monitored

### **6.3.16 Additional Clearways**

6.3.16.1 Clearways should be provided adjacent to the Park & Ride site to prevent overspill parking.

6.3.16.2 Clearways should be provided near to the Wylfa Newydd main site and Associated Development sites and specific bus stops which may be used for informal park and ride and locations which may be used for informal park and share.

#### **6.3.17 Prevention of unauthorised parking**

6.3.17.1 Regular monitoring of anti-social/unauthorised/'fly' parking and enforcement against this will be required.

#### **6.3.18 Travel Plans**

6.3.18.1 A full Framework Travel Plan and Site-specific Travel Plans for each Associated Development Site are required, to manage all staff and visitor trips.

6.3.18.2 All Framework Travel Plans must be agreed by the IACC prior to the commencement of the DCO Works or within three months of the granting of DCO consent (whichever is sooner).

6.3.18.3 Travel Plans must be agreed by the IACC prior to the opening of each Associated Development Site.

6.3.18.4 Mode share targets are required for all staff trips (to work and other purposes) and for visitors (to the HPC site). These can be monitored through the Traffic Monitoring and Management System and Travel Plan surveys.

#### **6.3.19 Construction Traffic Management Plans**

6.3.19.1 Construction Traffic Management Plan's (CTMP) are required to provide a strategy for managing Wylfa Newydd-related construction traffic, to include all construction traffic (HGVs and LGVs), for the main site and Associated Development sites.

6.3.19.2 Full CTMP's must be agreed by the IACC prior to the commencement of the DCO Works or within three months of the granting of DCO consent (whichever is sooner).

6.3.19.3 CTMPs will also be required for all sections of the proposed A5025 Off-line works.

#### **6.3.20 Abnormal Indivisible Loads**

6.3.20.1 The proportion, size, timing and routing of Abnormal Indivisible Loads (AILs) transported by road should be identified and a formal notification process adhered to.

### **6.3.21 Restrictions to Proposed Usage of Associated Development Sites**

6.3.21.1 The proposed usage of Associated Development sites should be restricted to use by Wylfa Newydd related operations only during a specific period of time, to avoid their potential unrestricted use for other possible uses.

### **6.4 IACC's Proposed Obligations**

6.4.1 Section 106 funding obligations required to make the development acceptable:

- a) Park & Share sites
- b) Bus stop improvements to make bus stops suitable for use
- c) Officer funding / participation in Transport Review Group
- d) Additional highway inspectors to monitor compliance against the Construction Traffic Management Plan(s), to ensure disruption to local residents directly impacted by construction road traffic (before and after A5025 improvements) is monitored and managed effectively.
- e) Road repair funding (as per the requirement to undertake the road condition surveys)
- f) Live Traffic Management measures (such as ANPR systems) to effectively and efficiently monitor construction (both HGV and Buses) and worker vehicle movements to ensure compliance with the CoCP and associated management plans.
- g) Funding for compensation/mitigation measures as a result local residents whom will be directly impacted by construction worker 'rat-running' or an increase in traffic levels.
- h) Valley crossroads signal reconfiguration works following opening of Valley bypass, which will include an assessment of the signal configuration and timings following the stopping up of the northern (A5025) highway arm.
- i) Funding will also be required for introducing suitable crossing provision for pedestrians across the frontage of the Petrol Filling Station (PFS) to the existing bus stop shelter along the A5. This includes the provision of a new kerbed footway in front of the PFS forecourt.
- j) Contingency funding is required for any adverse or unavoidable impacts not predicted at this stage including those resulting from inadequate baseline or predictive information at the application stage.

### **7.0 Summary of Traffic and Transport chapter**

7.1 The construction of the WNP will result in a significant level of traffic over a 10-year construction period which, without appropriate mitigation, monitoring and management, could have an adverse effect on the quality of life of Anglesey residents, businesses and visitors. Whilst the principal roads to be used to access the main WNP site and Associated Development will be the A5, A55 and A5025, the majority of the Island's roads will inevitably experience an increase in traffic as a result of the construction and operation of the WNP. Resultant road congestion, delays, journey time reliability will all have a negative impact. As an Island destination, and dependent on two bridges where regular bottlenecks and traffic jams already occur, the scale of the additional

traffic, if not properly managed, may lead tourists to opt to holiday and day trip elsewhere.

- 7.2 Horizon's DCO submission to PINS includes an assessment of the transport impact and identifies mitigation proposals, and the IACC recognizes that the A5025 On-line and Off-line highway improvements will reduce environmental impacts of the project and provide a legacy benefit. However, as identified in this chapter, the IACC believes there are much further and wider impacts on the highway network which need to be fully considered, a summary of these is provided below.

### **7.3 Traffic movements within the Early Years of the project**

- 7.3.1 The IACC has repeatedly emphasised the need for an Early Years Strategy which considers the implications of delay to the delivery the Early Years' components of the development, including the A5025 on-line and off-line improvements, the MOLF, the Park & Ride and the Logistics Centre. Delays in delivery could result in increases of HGV movements which will have a direct impact on local residents of Anglesey, sensitive receptors and road congestion.
- 7.3.2 Furthermore, Horizon has not demonstrated that the impact on the highway network does not adequately considered the cumulative impact with the North Wales Connection Project.
- 7.3.3 Mitigation requirements to address an Early Years Strategy issue comprise vehicle management in the form of threshold caps on HGVs, buses and light vehicles based on sensitivity analysis to ensure that there wouldn't be unacceptable levels of congestion, delay and undue environmental impact on sensitive receptors. The threshold caps need to be identified in the CoCP.
- 7.3.4 Additional work required also includes the review and adjustment to the Valley Crossroads signal timings following the construction of the off-line A5025 improvements and cycle and pedestrian improvements which can be addressed through S278 works or the S.106.

### **7.4 Construction Worker Car Sharing Strategy**

- 7.4.1 The IACC welcomes the principle of car sharing, however has concerns regarding the car share targets, as failure to achieve these will result in overspill parking, either through breaching the parking limit within the two proposed car parks, or 'fly parking' on the local road network. The IACC considers the assumptions made by Horizon are inflexible, unrealistic and overambitious and that a more pragmatic approach is needed which allows for greater flexibility amongst workers to meet each other near the strategic road network.
- 7.4.2 Providing contingency planning in the form of delivering the Park and Share sites identified jointly by the IACC, Gwynedd Council and the Welsh Government will make the car sharing issue acceptable to IACC.

## **7.5 Shuttle Bus Service**

- 7.5.1 The IACC has concerns regarding fly parking around bus stops, the potential use of hail and ride services and inappropriate routeing and bus stops, all of which would have an impact on road safety and the amenity of local communities.
- 7.5.2 Horizon has indicated that from the beginning of construction, every worker will be allocated a mode of travel and that shuttle bus users would be allocated a bus stop based on the location of their place of residence, and this will be included in the CoCP. Whilst the IACC welcomes this approach, further information and evidence on how this will be implemented and enforced is required.
- 7.5.3 In addition, there needs to be agreement on specific bus stops to be used, and road safety and pedestrian improvements to these bus stops to be identified through the S106 Agreement.

## **7.6 Use of unsuitable roads**

- 7.6.1 The IACC has concerns regarding significant increases in traffic using Class II, III and Unclassified roads to access the main site.
- 7.6.2 The IACC has undertaken traffic counts to gather baseline traffic data of likely 'rat-run' routes and will need to agree with Horizon the scope of monitoring usage and road condition to assess the scale of usage by WNP construction workers and appropriate mitigation to address the impacts of this, to be identified within the CoCP and the S106 Agreement.

## **7.7 Damage to the highway network**

- 7.7.1 Sections of the highway network will experience higher levels of traffic, in particular significant increases in HGVs which will impact on the road surface condition, road markings and the deterioration of the carriageway.
- 7.7.2 Horizon has indicated that road condition surveys need to be undertaken and a road repair strategy identified in agreement with the IACC, and that this needs to be included within the CoCP. The IACC welcomes this approach and will require a deflectograph survey to be undertaken at agreed intervals. Remedial works would need to be identified and secured through the S106 Agreement.

## **7.8 Capacity of A55 key interchange roundabouts**

- 7.8.1 Horizon has agreed that their assessment of the A55 junction 3 & 4 interchange roundabouts does not reflect the traffic demand at the junctions. Horizon has confirmed that there are anomalies with the traffic model results which are being reviewed.

7.8.2 The IACC require demonstration that there will be no operational issues at the Park & Ride site that will affect the capacity, safety and resilience of the adjoining highway network.

## **7.9 Network resilience and Contingency planning**

7.9.1 Horizon has not considered transport management in relation to the movement of goods and workers in the event of a traffic incident.

7.9.2 The IACC seeks discussion and agreement with Horizon, and Gwynedd Council and the Welsh Government regarding the management of WNP construction traffic during the closure of Britannia Bridge, and any other incident on the road network via a Traffic Incident Management Plan (TIMP).

7.8.3 The IACC requires these aspects to be resolved through additional information, amendments to and further detail in the CoCP and through inclusion in the S106 Agreement.

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