

From: [PMO](#)
To: [Wylfa Newydd](#)
Subject: RE: IACC Deadline 2 Submission : Local Impact Report - Introduction (email 3)
Date: 04 December 2018 20:37:35
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[Annex 1D-1O \(Batch 2 of 2\).zip](#)

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.*

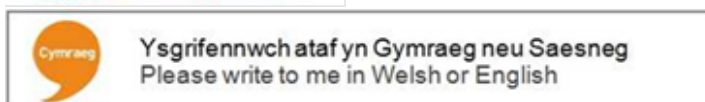
Bydd fersiwn Gymraeg yn cael ei ddarparu cyn gynted a phosib / *A Welsh version of the submission will be provided in due course.*

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 '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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Sent by Email

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Dyddiad / Date: 27/09/2018

Dear Kieran,

OFFICIAL SENSITIVE

Review of Horizon's DCO Application (Traffic and Transport)

1.0 Introduction

- 1.1 Following the submission of the Isle of Anglesey County Council's (IACC) Relevant Representations to the Planning Inspectorate, the purpose of this letter is to provide you with further detail and clarity on the IACC's position in relation to transport impacts and to seek agreement on mitigation measures. The IACC is eager to discuss and agree as many issues as possible prior to the DCO Examination to ensure that the proposed development is acceptable and that the Examination hearings can be as focused and productive as possible.
- 1.2 Where adverse impacts cannot be avoided, appropriate mitigation should be implemented to offset the identified adverse impacts. Compensation will be required in respect of residual impacts that cannot be mitigated. The aim of this letter is to outline these impacts and to define the mitigation measures required to make the development's impact acceptable in planning terms.
- 1.3 The matters raised below represent part of the IACC's ongoing engagement with you on the DCO application and are made in response to the application documents as submitted. The IACC reserves the right to add or amend these issues (and raise new issues) as necessary in its Written Representations and Local Impact Report.

2.0 Context

- 2.1 There have been significant changes to the transport proposals from PAC2 to PAC3, which includes increased emphasis on construction worker car sharing, as well as further parking provision at the Wylfa Newydd Development Area (WNDA).
- 2.2 The transport of materials, goods and personnel to and from the development during all project phases can have a variety of impacts on the surrounding transport infrastructure, particularly as over 5.7 million tonnes of bulk material will require transporting over the 10-year Wylfa

Newydd construction period.

- 2.3 The construction activities for the Wylfa Newydd Project will require a total labour workforce of up to 9,000 workers at peak. This covers construction workers at the Power Station Site at different phases and workers to construct and operate Associated Development and Off-Site Power Station Facilities.
- 2.4 The IACC is of the opinion that an adequate provision of suitable and fit-for-purpose infrastructure and promotional initiatives will form an imperative component in achieving sustainable travel. The provision of strategically located facilities can offer flexible, reliable and sustainable travel modes that maximises the efficiency of the project, as well as provide a legacy benefit to Anglesey.
- 2.5 The IACC also recognises the work done to date on the development of the A5025 On-line and Off-line highway improvements. These improvements will form a vital component of Horizon's transport strategy, including reducing environmental impacts of the project and providing a legacy benefit.

3.0 Summary of Main Issues

Following the IACC's initial review of the DCO submission the following key points are raised in relation to Transport:

3.1 Early Years Strategy

- 3.1.1 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-1¹. Notwithstanding this position, any delay to the delivery of the MOLF (as is evident at Hinkley Point C [HPC]) or if Horizon do 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.
- 3.1.2 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:-
- The A5025 On-line Highway improvements;
 - The A5025 Off-line Highway improvements;
 - The Marine Off-Loading Facility (MOLF);
 - Dalar Hir Park & Ride; and
 - Parc Cybi Logistics Centre.
- 3.1.3 To-date, Horizon have not demonstrated with clarity how the project components listed above 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) Avoid the potential significant disruption to local residents and its construction programme.

¹ Overarching National Policy Statement for Energy (EN-1)

- c) Does not impact upon the highway network during any overlap with other NSIP (i.e. North Wales Connection Project).

- 3.1.4 The IACC deems that the Construction Vehicle Profile² within the DCO Transport Assessment is not of a sufficient quality or precision to enable the undertaking of such analysis.
- 3.1.5 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:-
- i. Valley Cross roads: traffic signal controlled crossroads with sensitivity to the impacts of noise, vibration and air quality;
 - ii. Llanfachraeth: poor visibility, sensitivity to vehicles passing in opposite directions through the village, including impact of noise and vibration;
 - iii. 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
 - iv. Cefn Coch: two existing substandard bends in Llanrhwydrus between Llanrhyddlad and Cefn Coch.
- 3.1.6 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 concerns³.
- 3.1.7 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 Shuttle Bus) traffic would not introduce unacceptable levels of congestion, delay and undue environmental impact on sensitive receptors.
- 3.1.8 In accordance with Horizon's Phasing Strategy, the MOLF must be constructed and operational prior to First Nuclear Concrete for Unit 1 (end of Q1 year 3). The A5025 highway improvements and Park and Ride must be completed and operational by end of Q4 year 2. The Logistics Centre must be complete and operational by end of Q3 year 2. The IACC will seek to secure the phasing of these developments in the DCO Requirements and have clauses included which limit the construction of the Wylfa Newydd project unless these elements have been completed.

3.2 Construction Worker Car Sharing Strategy

- 3.2.1 The IACC welcomes the principle of car sharing (sustainable travel) and the provision of a Park & Ride facility on the island, however it is still significantly concerned and disappointed at the lack of acknowledgment by Horizon for the need of additional parking provision (on both the island and the mainland) to support the strategy.
- 3.2.2 The IACC's concerns with the proposed Car Sharing Strategy are twofold:-

1. Car Sharing Ratio Targets

Horizon have not submitted evidence to date which demonstrates that a car share factor of 2.0

² App C2-4 – DCO Transport Assessment: Figure 7-6 Construction vehicle profile

³ <https://www.somersetlive.co.uk/news/somerset-news/hinkley-point-2018-five-reasons-961448>

project wide is achievable and realistic. From analysing the car sharing statistics⁴ 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.

Horizon have 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.

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 early 1990s, car-ownership levels and worker travel patterns have changed significantly since then. Studies⁵ 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.

The information submitted within the DCO documents demonstrates that parking provision levels are fully dependent on the car share ratios which have been identified. The car share ratio 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:

- 1.4 car share ratio will require 2,006 spaces;
- 1.3 car share ratio will require 2,161 spaces; and
- 1.2 car share ratio will require 2,341 spaces.

These are in excess of the 1,900 available spaces at Dalar Hir.

As is highlighted within a separate letter submitted by the IACC, which provides an initial review of Horizon's DCO submission for Dalar Hir Park & Ride⁶, 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. This substantiates the IACC's concerns regarding the lack of resilience and contingency planning within the strategy.

2. Indiscriminate 'fly-parking'

To-date, Horizon have 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 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. 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 Area (WNDA). This reflects current practice by workers car sharing on the island.

Within the DCO documentation, Horizon have stated that any worker failing to adhere to their

⁴ <https://www.sedgemoor.gov.uk/article/1668/Transport-Review-Group>

⁵ Car ownership in Great Britain, RAC Foundation (October 2008)

⁶ Letter Submitted to Horizon September 2018 on Dalar Hir.

agreed and chosen route to work (e.g. car share arrangement or bus route) will be refused entry through appropriate enforcement measures and potentially be given a formal warning. The IACC is particularly concerned with the 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-sociable and inconsiderate fly-parking by construction workers. This sensitive issue has been highlighted in previous press releases in relation to the HPC project^{7,8}.

Further to this, the IACC are concerned with 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 HNP 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.

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.

Recognising the risk to local communities and the highway network, the IACC are currently working in collaboration with the Welsh Government and Gwynedd Council in developing suitable P&S sites to provide this resilience and contingency to the Wylfa Newydd workers during the construction phase. The IACC would welcome further discussion with Horizon on the implementation and delivery of these sites.

3.3 Use of Unsuitable Roads

- 3.3.1 As a result of Horizon's proposal to provide 1,900 parking spaces at the WNDA, 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 within the WNDA.
- 3.3.2 The IACC are seeking 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 Code of Construction Practice (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.
- 3.3.3 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 WNDA, as identified within the IACC's previous letter dated 25th 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.
- 3.3.4 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 Community Resilience Fund, as well as appropriate disciplinary action through the CoCP.

⁷ <https://www.somersetlive.co.uk/news/somerset-news/bridgwater-mp-ian-liddell-grainger-892699>

⁸ http://www.bridgwatermercury.co.uk/news/15698513.Frustration_at_increase_in_39_fly-parking_39_by_Hinkley_C_workers/

3.4 Shuttle Bus Service

- 3.4.1 Some of Horizon's 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 IACC opposes to a 'hail and ride' service on any Class I and II road on the basis of road safety and the potential for fly-parking.
- 3.4.2 Information within the DCO states 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.
- 3.4.3 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.
- 3.4.4 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. This corroborates the IACC's view that North Anglesey will be impacted the greatest.
- 3.4.5 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.

3.5 Damage to the Highway Network

- 3.5.1 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 HGV's. These include all highway links between the Strategic highway network (A5/A55/A5025) and Associated Development sites.
- 3.5.2 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:-
- i. road surface condition, e.g. cracking, potholes, etc.
 - ii. road markings, e.g. reduced retro-reflectivity
 - iii. Carriageway surface/structural deterioration
- 3.5.3 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:
- i. roads were improved in advance of construction;
 - ii. 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
 - iii. a final deflectograph survey will be undertaken at the end of the construction roads.
- 3.5.4 The IACC will seek a DCO requirement to undertake surveys of the existing road condition on the following sections of road at agreed intervals of the construction phase:-
- 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 prior during the power station construction phase; and/or
 - c) Remedial works to be undertaken by Horizon prior following the power station construction phase.
- 3.5.5 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.

3.6 Capacity of A55 Junction 3 & 4 interchange roundabouts

- 3.6.1 The Council 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.
- 3.6.2 Additionally, as has been raised by the IACC in a separate letter related to the Dalar Hir Park & Ride, 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. 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.

3.6.3 Due to the gaps in information, the Council 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:

- Turning traffic flows for 2016, 2020, 2023 and 2033 in the reference and with-development scenarios for the roundabouts identified above; and
- Junctions 9 model output for the roundabouts identified above.

3.7 Resilience of Britannia Bridge

3.7.1 The IACC re-iterates its position with regards to the resilience of Britannia Bridge. Local experience and traffic data already suggests that the Bridge is a pinch point on the A55 and at peak periods (eastbound AM and westbound PM), during summer months, or when the ferry has disembarked at Holyhead; this has considerable traffic implications on the Britannia Bridge. This may be further compounded with the larger ferries due to be commissioned by Irish Ferries in early mid 2020's. This is the only section of the E22 Euro Route that is single carriage so there is already concern that this will be further compounded by traffic generated by Wylfa Newydd. Additionally, adverse weather conditions have a significant impact on both the Britannia Bridge and Menai Bridge (diversion route) where the bridge may be closed to high-sided vehicles, as well as closure during an incident i.e. road traffic collision. 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.

3.7.2 This raises significant concerns with regards to resilience 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).

4.0 Conclusion

4.1 Although the IACC is supportive of the Wylfa Newydd project and the opportunities it brings, this support does not come at any cost. The IACC is committed to working with Horizon leading up to the DCO Examination to agree mitigation measures that will make the development acceptable.

4.2 Without agreeing a suite of mitigation proposals, which includes agreement on phasing and timing, monitoring and resilience funding, the development will not be acceptable to the IACC. Substantial progress needs to be made if we are to reach common ground before the DCO Examination.

Yn gywir / Yours sincerely,



DYLAN J. WILLIAMS

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