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Subject: Wylfa Newydd Examination Deadline 2: NACP responses
Date: 04 December 2018 20:15:38
Attachments: [image001.png](#)
[NACP Construction working hours.pdf](#)
[NACP Local Opportunities.pdf](#)
[NACP Residential Amenity.pdf](#)
[NACP Suggested site visit locations .pdf](#)
[NACP Temporary workers accommodation.pdf](#)
[NACP Tourism and recreation.pdf](#)
[NACP Traffic and Transport A5025 Treglele.pdf](#)
[NACP Traffic and Transport crosscountry routes.pdf](#)
[NACP Traffic and Transport other matters.pdf](#)

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

The responses include the following:

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

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

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

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

Regards

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Wylfa Newydd Nuclear Power Station: NACP Written Representation: Traffic and Transport, Cross Country Routes

1. Summary

- 1.1.1 Within the Wylfa Newydd documentation there is an assumption that all construction traffic will use the A5025 from Valley to access the site. However, it is acknowledged by Horizon that some construction traffic will route using the A5025 from Amlwch and some will travel along rural routes passing through villages such as Tregele and Llanfechell.
- 1.1.2 The NACP are concerned that the forecast traffic flows are unrealistically low and as a consequence the effects have been underestimated, resulting in a package of mitigation measures that do not fully address the traffic and transport impacts across North Anglesey.
- 1.1.3 To address this the NACP would like:
- Road safety improvements on the A5025 between Amlwch and the site;
 - Reassurance that no construction traffic will pass through Cemaes roundabout or along Tan y Bryn Road during school peak hours throughout the whole construction period; and
 - The installation of a Close Circuit TV/Automatic Number Plate Recognition (CCTV/ANPR) system in Llanfechell and Tregele villages.

2. Introduction

- 2.1.1 The NACP support in principle the Wylfa Newydd project and recognise that the development of this project will require a large-scale construction project which will have an impact on traffic and transport. The NACP do however have concerns over the nature of some of these impacts and their effect on multi modal travel and land uses adjacent to the transport network in the area.
- 2.1.2 Within the application documentation, there is an assumption that all construction traffic will use the A5025 from Valley to access the site. However, it is acknowledged by Horizon that some construction traffic will route using the A5025 from Amlwch (via Betws, Peibron, Burwen, Bull Bay and Cemaes) and some will travel along rural routes passing through villages such as Tregele and Llanfechell throughout the construction period. As a result a change is to be made to the Workforce Management Strategy stating that the Code of Conduct will include a clause requiring construction workers to stick to 'A' class roads and avoid 'B' class roads wherever practicable to avoid causing unnecessary nuisance and disturbance to local communities.
- 2.1.3 Notwithstanding this latest amendment, the NACP remains concerned that traffic will route along these roads to reduce journey distances and times which will result in an increase in traffic flows in these areas and as a consequence there will be a negative impact the safety and amenity of all road users in these areas.

3. Existing context

	A5025 between Amwlch and the site	Through Llanfechell village	Through Tregelge village
Speed	NACP requested the raw Automatic Traffic Count (ATC) data from Horizon so that they could consider the recorded speed of traffic on the roads affected. This information was not forthcoming from Horizon and a request that a revised list of data be prepared has been made, as such it remains identified as an ongoing issue within the Statement of Common Ground. Anecdotal reports suggest that traffic speed along the A5025 between Amlwch and the site are significantly higher than the posted speed limit.		
App-100, Document 6.3.13 ES Volume C - Road traffic-related effects (project-wide) App C2-3 - Traffic Flows	4,791 vehicles per day, 118 are HGV	2,174 vehicles per day, 86 are HGV	805 vehicles per day, 33 are HGV
Infrastructure, Mapping and Google imaging	This section of the A5025 has several bends with slow road marking, road bend warning signs and double white lines (indicating no overtaking). This road is partially lit, has footways where it runs near the settlements, and there are laybys located at several points along this section. Furthermore, there are two places on this section of highway where there is potential for conflict with school children: - the A5025 Cemaes roundabout, with school children attending Ysgol Gynradd Cemaes; and - Tan y Bryn Road, with school children attending Ysgol Syr Thomas Jones.	This section of road has a speed limit reduction to 30mph on approach to Llanfechell, with street lighting but no controlled or uncontrolled crossings. Residential properties are very close to Brynddu Road which runs through the village, therefore, there is no space for a continuous footway along the road. The sharp road bends and close proximity of the properties restricts pedestrian visibility.	This section of road has a speed limit reduction to 30mph on approach to the village, with street lighting and no controlled or uncontrolled crossings. Residential properties are very close to Cromlech Terrace therefore there are no continuous footways. The sharp road bends and close proximity of the properties restricts pedestrian visibility and Cromlech Terrace has no central road markings.
Personal Injury Accidents (PIA) 5 years	17 recorded injury accidents: - none were fatal - ten were serious - seven were slight - three Non-Motorised Users (NMU) accidents The NMU involved two cyclists and one pedestrian. The pedestrian and one of the cyclists were recorded as serious accidents, whilst the other cyclist accident was recorded as slight.	Seven recorded injury accidents: - none were fatal - two were serious - five were slight - one NMU The NMU was a slight accident involving a pedestrian.	One serious recorded injury accident and no NMU accidents.

4. Construction

4.1 Predicted impacts

A5025 between Amwlch and the site

- 4.1.1 App C2-3 Traffic Flows data from Horizon shows construction traffic flows between Amwlch and the site during the construction period of 6,524 AADT flows of which 145 would be HGV. This represents an increase of 1,733 vehicles and 27 HGV per day, some of which will be due to background traffic growth and some due to the construction of Wylfa Newydd.
- 4.1.2 The NACP are concerned that the numbers presented show a minimal increase in traffic and this is an unexpected result given the presence of a significant construction project and the likelihood that all types of construction vehicle will pass along this section of the A5025. As a result, the NACP are uneasy with the analysis undertaken and therefore the mitigation schemes developed. They feel that the assumption that all construction traffic will route to the site via the A5025 from Valley is optimistic and unrealistic. In neglecting to recognise and address the potential effects of the A5025 between Amwlch and the site, then impacts which could be significant in terms of road safety are not being addressed.
- 4.1.3 The Transport Assessment (APP-101, Document 6.3.14 App C2-4) presents an analysis of the PIA and determines that the A5025 between Amwlch and site is not termed an accident cluster. The section also concludes that "Based on this analysis the records for personal injury accidents included in clusters do not demonstrate strong correlation of causes that would be of relevance to the Wylfa Newydd Project."
- 4.1.4 Road safety is the principal concern of the NACP for the A5025 between Amwlch and the site. The NACP feel that the number of serious accidents along this section of the A5025 is high, with ten serious accidents recorded within five years. They are nervous that an increase in traffic flow, with drivers who maybe unfamiliar with the roads may exacerbate the accident potential and result in more accidents or even fatal accidents.
- 4.1.5 The NACP also raised, through the SoCG, the potential for conflict between school children on route to Ysgol Gynradd Cemaes and Ysgol Syr Thomas Jones and construction traffic on adjacent roads. They were reassured that construction vehicles would not be on the highway network during school peak times. However, a review of the Request for Non-Material Change no.5 HGV Movements, found a statement suggesting that this restriction may only be in place during the initial stages of construction. This is obviously a significant concern for the NACP who wish to ensure that school children are not affected by the construction activities.

Through Llanfechell village

- 4.1.6 App C2-3 Traffic Flows data from Horizon shows construction traffic flows through Llanfechell during the construction period of 2,605 AADT flows of which 74 would be HGV. This represents an increase of 431 vehicles and a decrease of 12 HGV per day, these numbers will also include some allowance for background traffic growth.
- 4.1.7 The NACP are concerned that the numbers presented show a reduction in the number of HGV which is counter intuitive given the presence of a significant construction project and the likelihood that employee bus shuttles will pass through the village. As a result, the NACP are uneasy with the analysis undertaken and therefore the mitigation schemes developed. They feel that the transport effects on the village of Llanfechell, given its highly constrained highway network will be significant

and that the population of the village will at best be inconvenienced and at worst will be put at risk to an unacceptable level.

Through Tregelle village

- 4.1.8 App C2-3 Traffic Flows data from Horizon shows construction traffic flows through Tregelle during the construction period of 1,008 AADT flows of which 40 would be HGV. This represents an increase of 203 vehicles and seven HGV per day, these numbers will also include some allowance for background traffic growth.
- 4.1.9 The NACP are concerned that the numbers presented show a minimal increase in traffic which is unexpected given the presence of a significant construction project and the likelihood that employee bus shuttles will pass through the village. As a result, the NACP are uneasy with the analysis undertaken and therefore the mitigation schemes developed. They feel that the transport effects on the village of Tregelle, given its highly constrained highway network will be significant and that the population of the village will at best be inconvenienced and at worst will be put at risk to an unacceptable level.

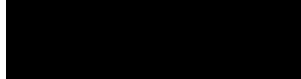
5. Mitigation

A5025 between Amwlch and the site

- 5.1.1 The NACP would like Horizon to investigate and implement road safety improvements on the A5025 between Amwlch and the site, with the aim of reducing the number and severity of recorded accidents. This mitigation would also provide a legacy for the community beyond the construction of Wylfa Newydd and potentially mitigate similar effects that may arise during the operational phase.
- 5.1.2 The NACP would also like a commitment from Horizon that no construction traffic will pass through Cemaes roundabout or along Tan y Bryn Road during school peak hours throughout the whole construction period unless there are exceptional circumstances and there is prior agreement with the school in question.

Through Llanfechell and Tregelle villages

- 5.1.3 The NACP would like to see the installation of a CCTV/ANPR system in both villages to monitor Wylfa construction traffic passing through. It is hoped that such a system could be used to identify those driving dangerously, illegally or anti-socially. The system would also provide evidence of any employees that do not-comply with the Code of Construction Practice and allow Horizon to enforce this element of their Workforce Management Strategy. NACP are aware of at least one other major construction project in the UK where the developer agreed to fund such a system to reduce 'rat-running' on minor local roads (Sirius Minerals/York Potash Ltd's Woodsmith Mine scheme).

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