

Representations to the Wylfa Newydd Development Consent Order application (ref. EN010007)

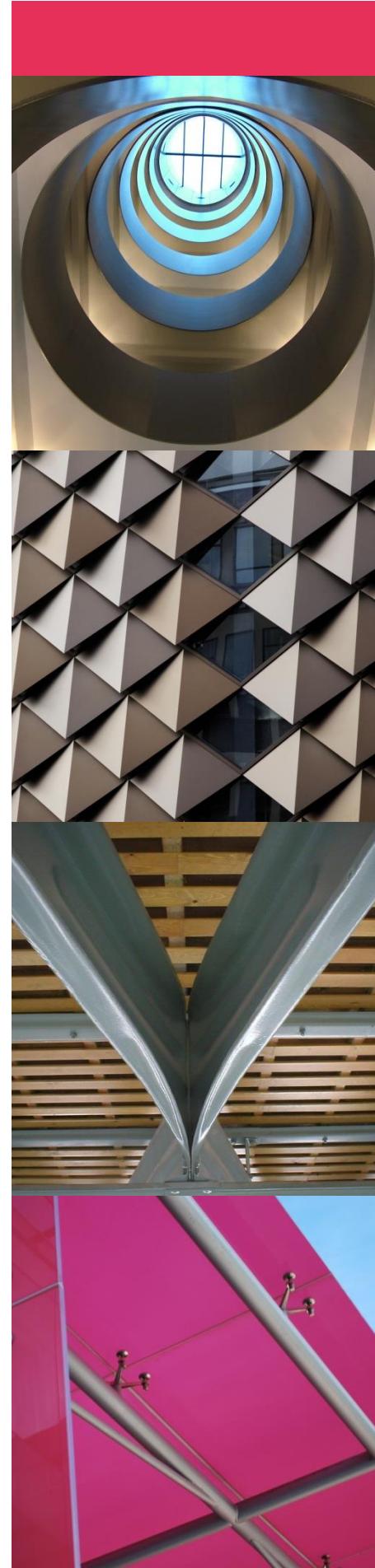
Traffic and Transport Matters

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Curtins
51-55 Tithebarn Street,
Liverpool, L2 2SB.
Tel: 0151 726 2000
www.curtins.com

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Author	Signature	Date
Keith York MCIHT FIHE Associate Transport Planner	[Redacted]	04 December 2018

Reviewed	Signature	Date
Keith York MCIHT FIHE Associate Transport Planner	[Redacted]	04 December 2018

Authorised	Signature	Date
Keith York MCIHT FIHE Associate Transport Planner	[Redacted]	04 December 2018

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1.0 Introduction

1.1 Background and Scope of Evidence

A Development Consent Order (“DCO”) application for the Wylfa Newydd Nuclear Power station was submitted by Horizon Nuclear Power (“Horizon”) to the Planning Inspectorate (“The Inspectorate”) on 1 June 2018. The DCO application was accepted for examination on the 28 June 2018 and the examination hearings are scheduled to take place between 7-11 January 2019 and 4-8 March 2019.

1.2 My Background

- 1.2.1 My name is Keith York, I lead Curtins’ Transport Planning team based in the Liverpool Office and I am responsible for the development of business and the delivery of projects across Merseyside and North Wales.
- 1.2.2 I joined Curtins in 2010 and have worked within the private sector for 25 years. During this time I have gained extensive experience in transport planning and policies, site master planning and traffic/highway engineering.
- 1.2.3 My experience has a commercial development focus and I specialise in developing transport strategies to underpin numerous projects for both public and private sector clients. My experience spans across a wide range of project types including: leisure, tourism, residential development, education establishments; sports stadia; town / area master plans; light rail route feasibility; and significant highway infrastructure schemes to phasing and implementation. This experience includes CPO and Planning Inquiries, TROs and Stopping-Up Orders and the negotiation of S106 and S278 Agreements.
- 1.2.4 Having been involved with the Land & Lakes development proposals on the Holy Island since June 2011, I confirm that the evidence which I present in this document presents an accurate account of the project’s history and reflects my professional opinions with regard to the draft DCO and its supporting documents.

1.3 Company Profile

- 1.3.1 Curtins is a company with a heritage in engineering spanning over 50 years. It has developed design consultancy services nationally but with a strong local presence, having offices in London, Leeds, Manchester, Nottingham, Liverpool, Cambridge, Edinburgh, Glasgow, Kendal, Dublin, Douglas, Birmingham, Cardiff and Bristol.
- 1.3.2 Our specialist Transport Planning team understands the need to adopt a commercial and innovative approach, from the early stages of the project and throughout the entire process, including matters

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relating to phasing and delivery. This experience includes CPO and Planning Inquiries, TROs and Stopping-Up Orders and the negotiation of deliverable s106 and s278 Agreements.

1.4 Curtins' Project History

- 1.4.1 Curtins was appointed by Land & Lakes Ltd in June 2011 to provide traffic and transport advice in support of its proposed development within three adjoining areas at Penrhos Headland, Cae Glas and Kingsland (The L&L Development). Curtins' appointment has continued to the present day.
- 1.4.2 The L&L Development proposals comprised an initial period of use as temporary workers' accommodation (associated with the expansion of the nuclear facilities (TWA) at Wylfa, followed by a tourism-based legacy use in the form of a holiday/leisure destination, as well as creating a traditional residential development at the Kingsland site.

1.5 Curtins' L&L Development Project Involvement

- 1.5.1 In addition to supporting the project team in the development of site masterplans for the L&L Development proposals, Curtins produced the Transport Assessment (TA) which accompanied the planning application.
- 1.5.2 The content of the TA was agreed through extensive discussion with highways officers at Isle of Anglesey County Council (IoACC Highways) and at Welsh Government (WG Highways).
- 1.5.3 Through these discussions it was demonstrated and agreed that the proposed legacy use of the L&L Development had the most significant scope for traffic impact upon the surrounding highway network during the traditional peak hour periods compared with the initial TWA use of the L&L site. The legacy use was therefore the focus of the TA.
- 1.5.4 The justification for this position being reached are outlined below.
- 1.5.5 For the TWA use of the L&L Development, as with the HNP Campus proposals, the L&L Transport Assessment was produced on the basis that the Wylfa construction programme would include shift patterns which sought to minimise conflict with the network peak hour periods.
- 1.5.6 From the assessments undertaken by HNP regarding the transit of workers to Wylfa, it can be summarised that the following is relevant to the impacts during network peak periods:
 - 1.5.6 Morning Peak Hour Impacts: The HNP forecast per 1000 workers is for 230 staff to attend each morning shift. If using a 45 seater coach, this equates to 21 coaches per morning shift for a TWA facility comprising 4000 workers.
 - 1.5.6 Coach traffic generated during the identified morning network peak hour traveling between Cae Glas and Wylfa would therefore comprise 21 coaches returning empty from the 7am

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shift in time for the collection from Cae Glas at approximately 07:20 in time to return to Wylfa ahead of the 08:00 shift. This equates to 42 two-way trips during the network peak hour period.

- 1.5.6 Evening Peak Hour Impacts: The HNP forecast per 1000 workers is for 103 staff to attend each night shift. If using a 45 seater coach, this equates to 10 coaches per night shift for at TWA facility comprising 4000 workers.
- 1.5.6 Coach traffic generated during the identified evening network peak hour traveling between Cae Glas and Wylfa would therefore comprise 10 coaches returning empty from the 16:30 shift in time for the collection from Cae Glas at approximately 16:50 in time to return to Wylfa ahead of the 17:30 shift. This equates to 20 two-way trips during the network peak hour period.
- 1.5.7 The above forecast number of coach movements between Cae Glas and Wylfa is less than the additional traffic movements modelled in the original TA for the scenario: "Full Parc Cybi + Legacy Use." This is with the exception of the A5 / A5025 Valley traffic signal controlled junction, where the additional coach movements would be in excess of the legacy scenario described above, however, HNP has already identified a mitigation scheme to deliver significant capacity benefits in this location which would accommodate the additional coach trips.
- 1.5.8 The Parc Cybi business park adjacent to Cae Glas was originally intended to deliver development plots ranging from B1 office to significant commercial and industrial premises which had the potential to generate high levels of additional vehicular trips. The road infrastructure within and around the Parc Cybi site was designed and built with such high traffic demands in mind.
- 1.5.9 However, during the years which followed, it became apparent to IoACC Highways and WG Highways that the Parc Cybi development would not materialise in the form which it had been originally been granted planning approval for and that instead, lower traffic-generating uses would be delivered on that site – such as the lorry park which comprises effectively 100% pass-by trips from the A55 mainline traffic flow.
- 1.5.10 The proposed Park & Ride (P&R) facility on the Cae Glas site, for use by workers commuting each day from home added to the limited number of TWA coach movements to Wylfa, was demonstrated through discussion with IoACC and WG to generate fewer network peak-based vehicular trips than a fully built-out Parc Cybi development.
- 1.5.11 Therefore, the TA and supporting documents associated with the L&L Development planning application demonstrated that the surrounding road infrastructure could accommodate the forecast traffic generation associated with the proposed legacy use of the L&L Development and that the road

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infrastructure linking the site with the A55 was capable of accommodating the traffic associated with the proposed initial TWA use of the site (including the proposed c.800 space Park & Ride facility).

- 1.5.12 In order to reduce the workers' reliance upon the use of private cars for trips whilst residing within the L&L Development, a commitment through the s106 agreement was made to ensure that a shuttle bus service operated throughout the initial years of the sites' operation as workers' accommodation and beyond into the legacy leisure and residential uses.
- 1.5.13 The shuttle bus would link the area of Holyhead with three areas within the L&L Development. Its proposed route included connections with the rail and ferry facilities as well as enabling access to the centre of Holyhead.
- 1.5.14 Whilst some shops and local services are accessible within acceptable walking distances of the L&L Development, it was recognised that a short journey on the proposed shuttle bus would further enhance the quality of life for workers and legacy residents at the L&L Development by affording access to the town's current range of retail, leisure and service providers. Further, by creating a significant potential increase in the town's population during both the temporary (workers') and permanent (legacy) timescales, the town could react positively to the associated potential regeneration benefits.
- 1.5.15 The traffic and transport mitigation as proposed and agreed is appropriate (Reference: Appendix xx The Section 106 agreement and its associated schedules). In addition, the HNP proposals (prior to its inclusion of a significant quantum of workers' accommodation within the Wylfa site) had identified a range of highway mitigation measures along the A5025 from Valley to Wylfa. Therefore, should the L&L Development site be selected to accommodate up to 3500 workers, the highway proposals identified by HNP could also be implemented in order to enhance and protect efficient and stable journey times for coach transit to Wylfa.

2.0 Areas of Concern

Following a review of the draft DCO and its accompanying documents there are five key areas of concern relating to Traffic and Transport are identified as being deficient:

2.1 Area of Concern 1: Site Selection process

- 2.1.1 The site selection process outlined within the DCO's supporting documents is substantially flawed. It would appear that the L&L Development's appropriateness for continued consideration has been dismissed at an early stage based upon two traffic and transport-related factors.
- 2.1.2 Firstly within HNP document Site Selection Report – Volume 4 at para. 6.4.20 it states that there is no provision or infrastructure for coaches.
- 2.1.3 The proposed P&R facility at Cae Glas includes infrastructure for coaches to arrive, collect workers, circulate and depart. Being an outline permission, further enhancements to these facilities can be delivered in a straightforward manner through the reserved matters process.
- 2.1.4 Further, workers within the Kingsland area would be transferred by shuttle bus to the Cae Glas facilities for onward coach transit to Wylfa.
- 2.1.5 Secondly, again within HNP document Site Selection Report – Volume 4 at para. 6.4.20 reference is made to the master plan of the Cae Glas site having meandering tracks which it suggests are inherently unsuitable for well trafficked roads.
- 2.1.6 However, coach traffic will only likely use the initial (western) elements of the Cae Glas site, within the proposed P&R area, where the coach terminus for worker collection and drop-off is identified. Notwithstanding, the L&L Development possesses an outline planning permission and therefore the nature of the internal road infrastructure can be adapted to suit points of detail regarding its design (including road alignment) during the reserved matters process should such amendments be necessary.
- 2.1.7 Therefore, for the reasons addressed above, the L&L Development should not have been so readily dismissed during the site selection process and it follows that the L&L Development should have remained a feasible alternative (preferred) to the option of providing accommodation for up to 4000 workers on-campus within demise of the Wylfa site.
- 2.1.8 Additional costs are cited by HNP associated with transfer of the workers from the L&L Development to Wylfa. Within the overall additional cost per 1000 workers stated by HNP, I have examined the potential direct costs associated with the provision and operation of an appropriately sized fleet of coaches:

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- 2.1.8 Requirement of 5 coaches per shift (max occupancy of 45 seats per coach taking a total of 230 workers).
- 2.1.8 The morning shift start times are grouped in threes, set at 30 minute intervals, which therefore requires dedicated coach provision for each of those three shifts (the night shifts have less workers, thus the day shifts represent the times of highest demand for coaches).
- 2.1.8 A total fleet of 15 coaches would be required to serve all shifts every 24 hours.
- 2.1.8 Each coach attracts an approximate cost of £130,000 per annum (over a five year period) which includes the physical cost of the coach, driver wages, welfare, fuel and maintenance.

2.1.9 Therefore the estimated total direct costs to operate the coach shuttle service between Cae Glas and Wylfa, per 1000 workers, is £1.95m.

2.2 Area of Concern 2: Sustainability

- 2.2.1 It is felt that important matters surrounding sustainable development have not been fully considered within the DCO and its supporting documents.
- 2.2.2 This lack of consideration of sustainable development from a traffic and transport perspective is evident within both its proposals to accommodate up to 4000 workers on-campus at Wylfa and is evident within the factors used for the site selection process.
- 2.2.3 The topic of sustainable development of course reaches beyond traffic and transport matters, as the siting developments in sustainable locations where prospective residents are able to integrate with existing communities and facilities will ensure that they benefit from a heightened quality of life. Other evidence submitted by my colleagues will address related points within their respective areas of expertise.
- 2.2.4 The aspects which I will focus upon relate to people's ability to gain access to a range of local facilities and services by sustainable travel modes including walking and cycling.
- 2.2.5 The remoteness of the Wylfa Campus site for workers cannot be considered as a sustainable location, notwithstanding the limited proposals for workers' facilities on-site which serve to further isolate the workers from existing communities on the island.
- 2.2.6 Such factors are likely to lead to issues with regard to staff retention which, if the TWA is provided in an isolated and unsustainable location, would appear to contradict the need identified within the Workforce Accommodation Strategy document which states at para. 7.1.3:

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“The Wylfa Newydd Project needs to be able to attract and retain a highly skilled workforce.”

Walking Catchments

2.2.7 The opportunity for workers to be able to walk from their residences to existing retail, leisure, travel and social locations either side of their working shifts is excellent from the Cae Glas and Kingsland sites. The same opportunities do not exist around the Wylfa Campus site. Set out below is a series of detailed summaries of what amenities and facilities can be found within a 10, 20, 30 or 40 minute walking distance of each site.

2.2.8 The  symbol indicates the centre of the site from which the walking assessment has been undertaken from. The red area is within a ten minute walk, the next outwards catchment in a more pale red represents the area within a 10 to 20 minute walk, the purple catchment shows the area within a 20 to 30 minute walk from the site and finally the blue area is within a 30 to 40 minute walk at a standard, casual pace of 4.8km/h.

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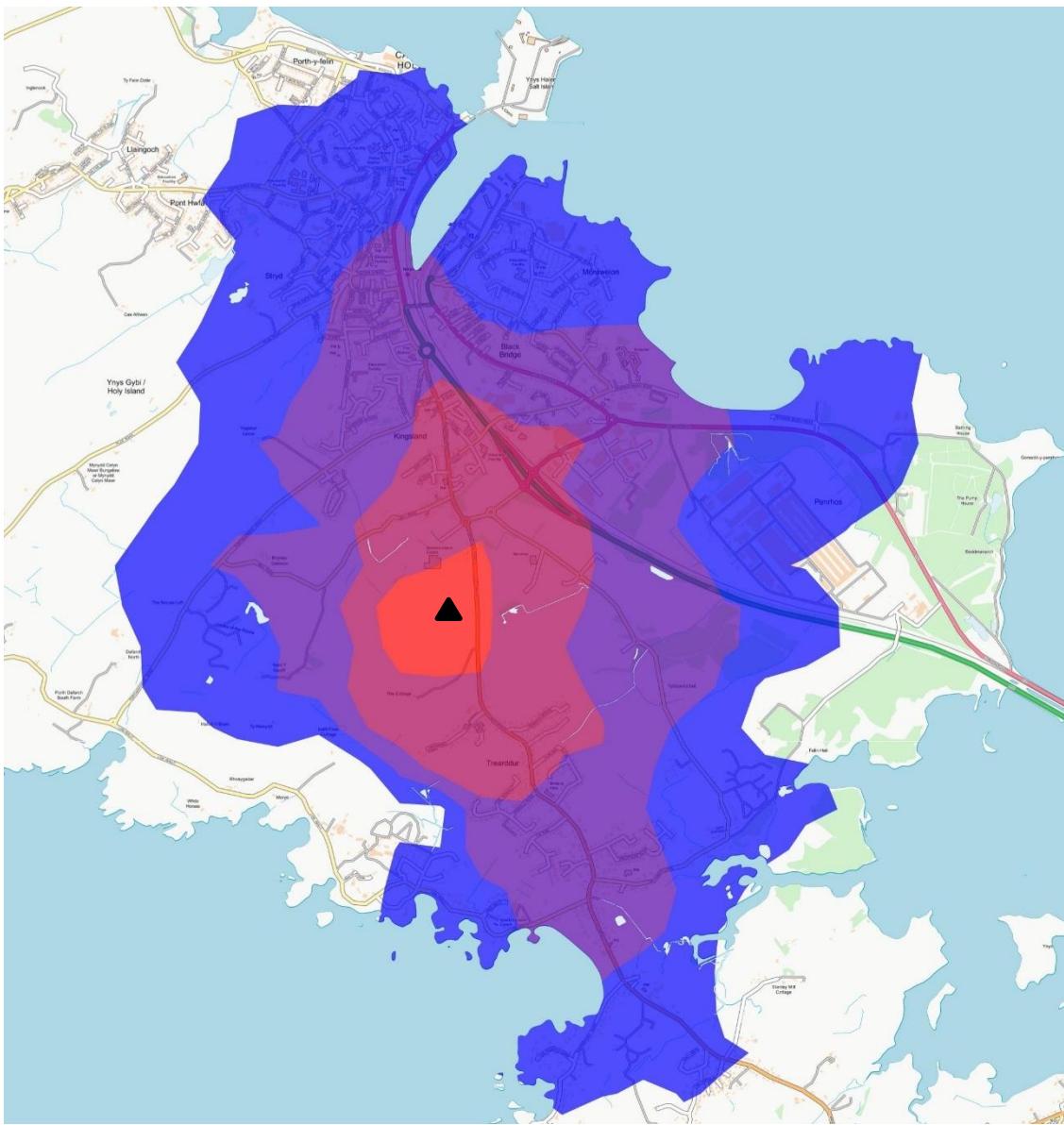


Image 1 – Kingsland Site 40 minute Walking Catchment

2.2.9 Image 1 above shows the catchment from the centre of the proposed Kingsland site. Within a 20 minute walk of the site one can reach parts of the nearby Holyhead Retail Park which includes two large supermarkets, also within the catchment lies a café, bus stops, Holyhead leisure centre and places of worship.

2.2.10 Within a 30 minute walk of the site lies the remainder of the Holyhead Retail Park which includes another supermarket and other non-food retail units and fast food outlets. Also located within the 30 minute walk catchment is Holyhead rail station, Penrhos Stanley Hospital, further retail offer, places of worship, a dentist and restaurants.

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2.2.11 Within 40 minutes' walk of the Kingsland site most Holyhead town centre is accessible, including the Holyhead ferry terminal.

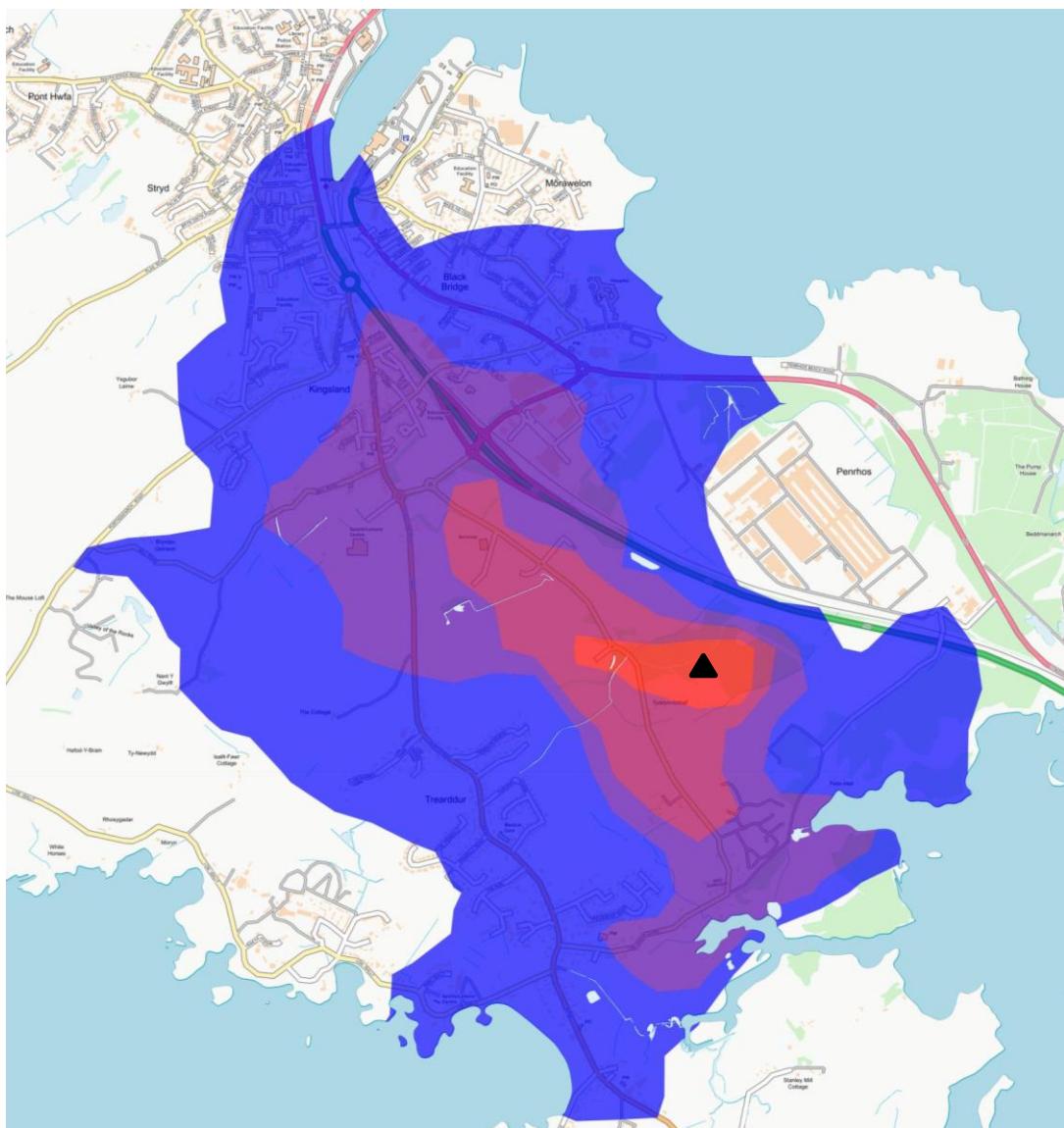


Image 2 – Cae Glas Site 40 minute Walking Catchment

2.2.12 Image 2 above shows the catchment from the centre of the proposed Cae Glas site. Within a 10 minute walk of the site there is a café. Within a 20 to 30 minute walk of the site is the nearby Holyhead Retail Park which includes two large supermarkets, non-food retail and fast food outlets. Within that walk catchment there are also places of worship, a dentist, restaurants as well as a bus stops, and Holyhead leisure centre.

2.2.13 Within a 40-minute walk of the site lies another supermarket, Holyhead rail station, Penrhos Stanley Hospital and the entrance to Holyhead ferry terminal.

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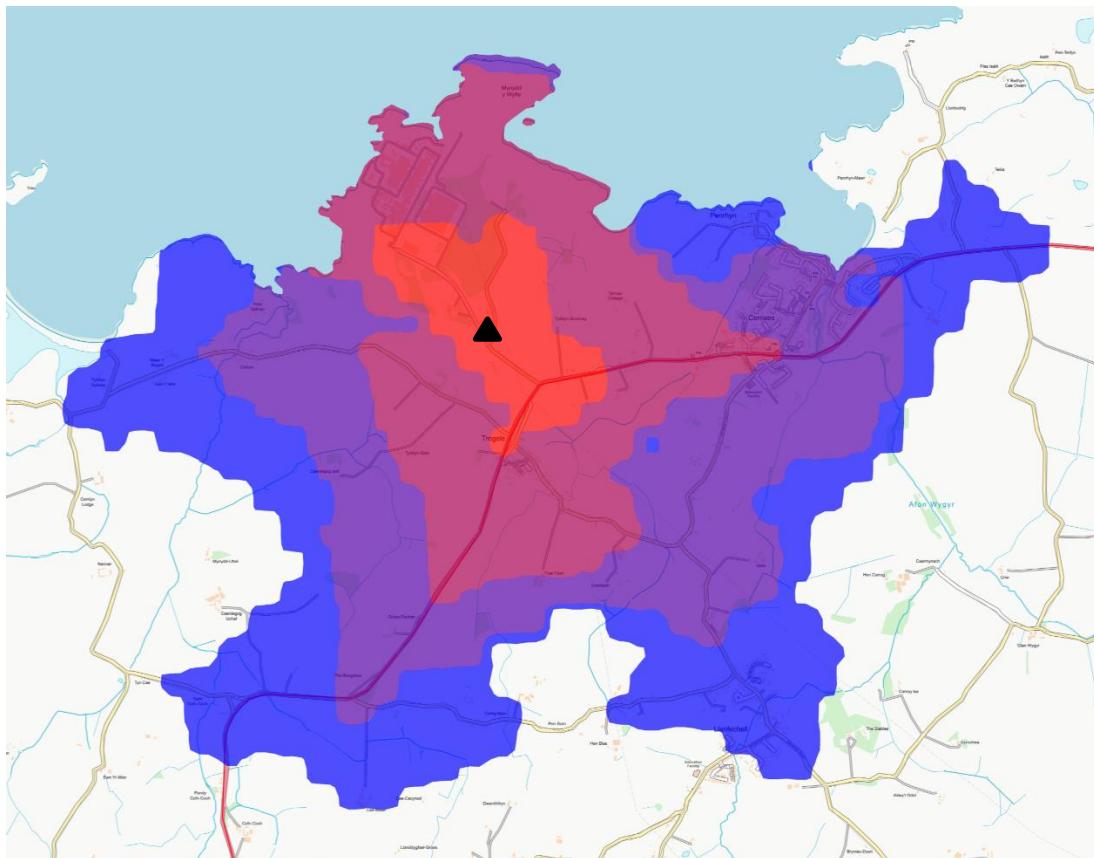


Image 3 – Wylfa Site 40 minute Walking Catchment

2.2.14 Image 3 above shows the walking catchment from the centre of the proposed Wylfa site. There are currently few facilities within a reasonable walking distance of the Wylfa site, if workers elected to leave the site on foot, the nearest facility (Tregele petrol station) has no footway provision from the Wylfa site, which would result in workers having to walk within the highway in direct conflict with vehicles.

2.2.15 There are some facilities located to the east of the Wylfa site within Camaes village. The facilities within Camaes are approximately a 25 minute walk from the site with the whole village being within 30 minutes of the Wylfa site. Within Camaes there are small scale local shops such as newsagents, a fish and chip shop, a pharmacy, a chapel, a barbers as well as a couple of public houses.

2.2.16 Due to the number of workers proposed by HNP to reside within the on-campus TWA these facilities, suitable to serve the existing village of Camaes and its tourism trade, are unlikely to be sufficient or of suitable scale to cater for the workers at Wylfa. The walking distance of 30 minutes for limited facilities is likely to be unattractive for workers at Wylfa to make the journey on foot and thus more car trips are likely.

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2.2.17 In summary for journeys on foot, it has been demonstrated that the Kingsland and Cae Glas sites are within far more accessible locations and offer potential use of local community's existing facilities and businesses within reasonable walking distances. By stark contrast, the Wylfa site does offer access to limited existing facilities on foot however, due to the remoteness of this alternative TWA site and its distance from existing towns and suitable facilities.

Cycling

2.2.18 The **▲** symbol indicates the centre of the site from which the cycling assessment has been undertaken. The red area is within a ten minute cycle time, the next outwards catchment in a paler red presents the area which is between 10 and 20 minutes cycle time, the next purple catchment is the area within a 20 to 30 minute cycle from the site and the blue area is the area within a 30 to 40 minute journey by cycle.

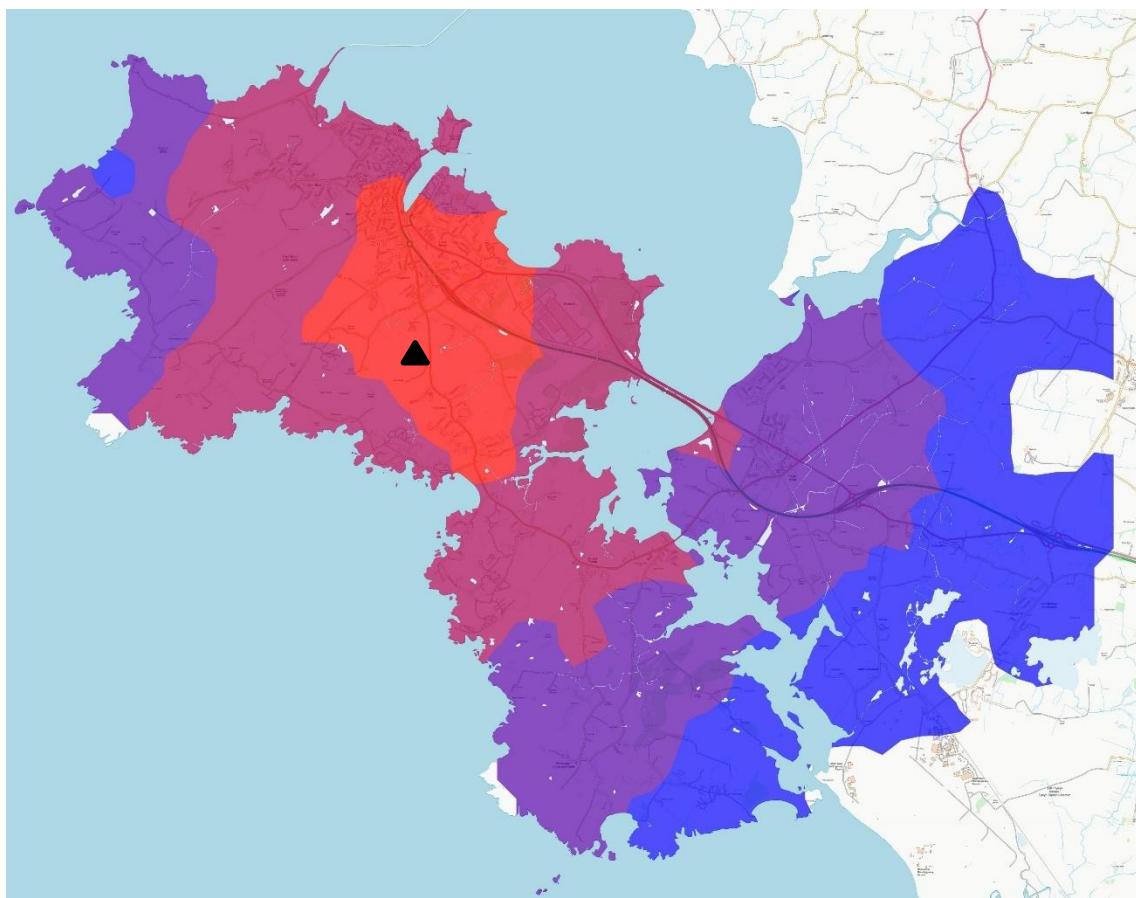


Image 4 – Kingsland Site 40 minute Cycle Catchment

2.2.19 Image 4 above shows that within a ten minute cycle ride of the Kingsland site the majority of Holyhead town centre and its rail and ferry terminals are accessible, along with all of the facilities mentioned in the 40 minute walking catchment earlier in this report. Also within this ten minute cycle catchment are several bicycle-friendly routes, originating from within Holyhead.

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2.2.20 Within 20 minutes' cycle ride from the Kingsland site, the cycle-friendly route becomes a dedicated off-road cycle trail. This trail continues to run further from the site, through the 30 and then 40 minute cycle catchments, offering cycle friendly routes across Anglesey from The Holy Island.

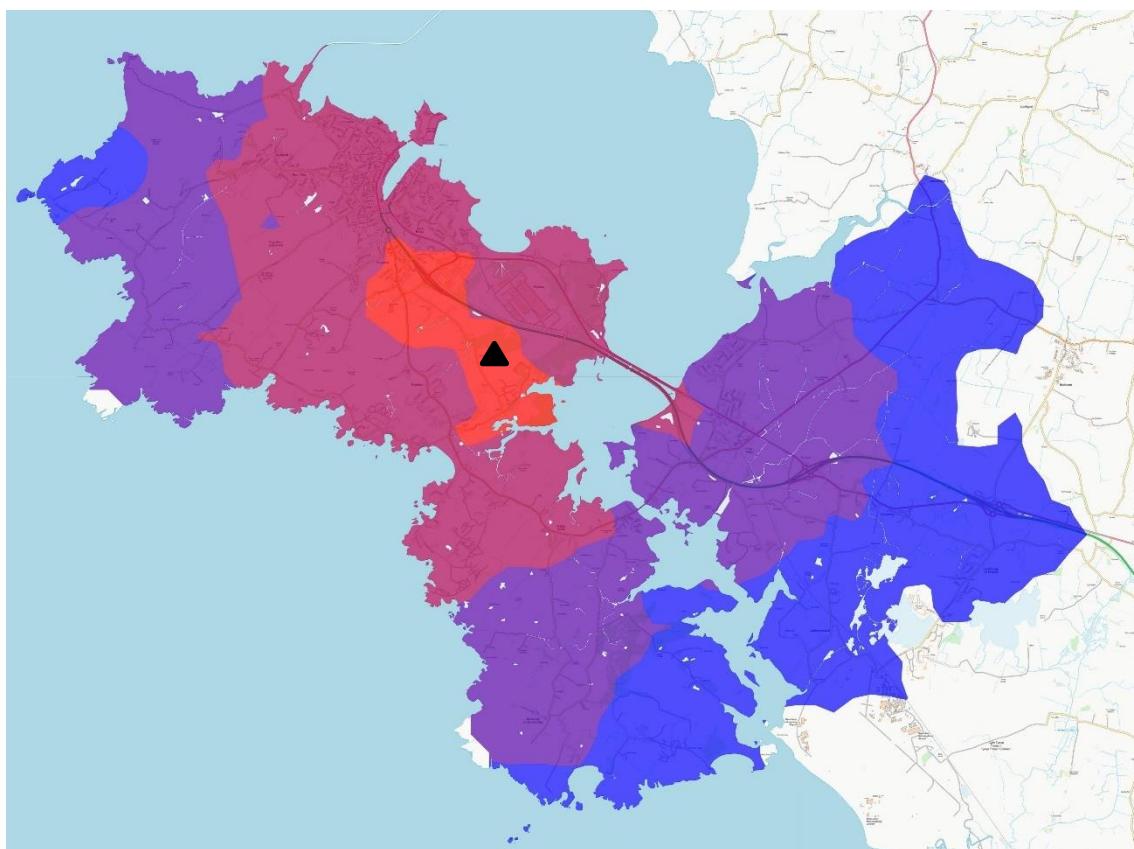


Image 5 – Cae Glas Site 40 minute Cycle Catchment

2.2.21 As within the catchments of the Kingsland site shown earlier, Image 5 above shows that the Cae Glas site is within a ten-minute cycle ride of parts of Holyhead town centre. The rail and ferry terminals are accessible within 20 minutes' cycle ride from the Cae Glas site along with the cycle-friendly routes from within Holyhead mentioned earlier. Within 20 this minute journey distance the cycle-friendly route becomes a dedicated off-road cycle trail. This trail continues to run further from the site through the 30 and 40 minutes catchments, offering cycle-friendly routes across Anglesey from The Holy Island.

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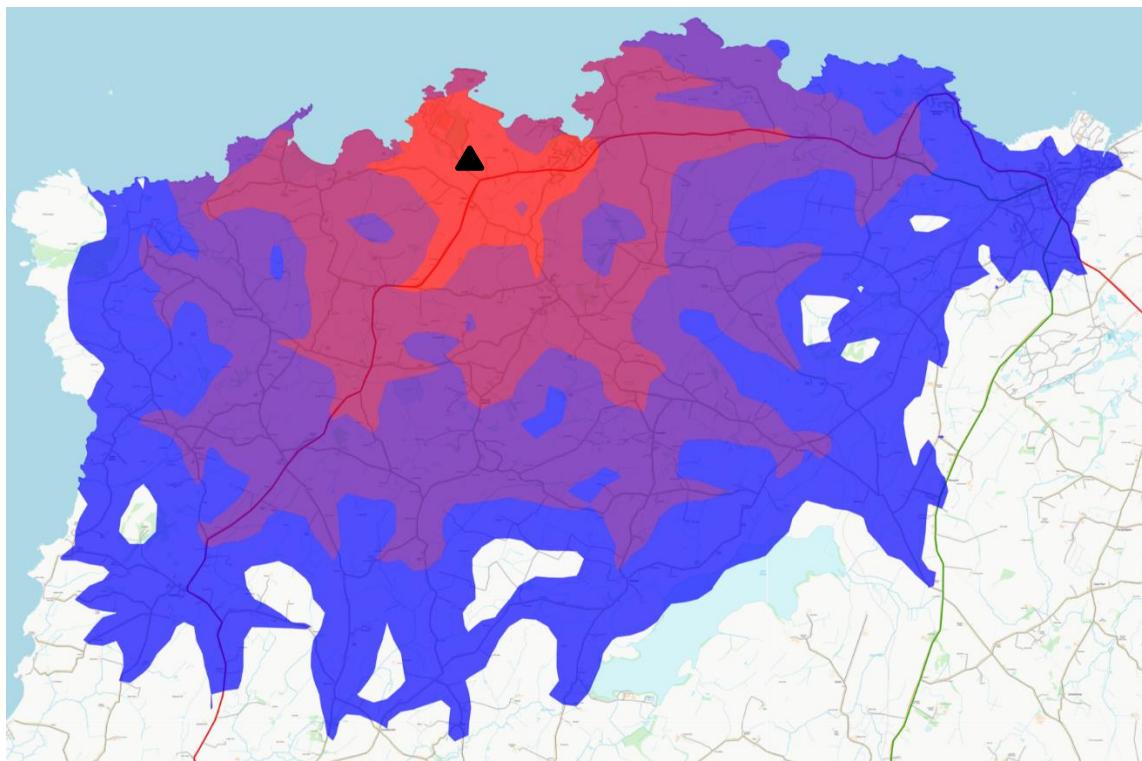


Image 6 – Wylfa Site 40 minute Cycle Catchment

2.2.22 Image 6 above shows that within a 40 minute cycle of the *Wylfa* site the majority of Amlwch is accessible along with the facilities located within the town. There are fewer facilities within Amlwch than those within Holyhead, given the respective sizes of these towns and it should also be noted that the shortest highway route to Amlwch is along the A5025 which a de-restricted speed limit road with lane widths of circa. 3m and offers no cycle lane provision and could be intimidating for cyclists to consider for such a journey. Once within Amlwch there are cycle friendly routes offering access towards the south of the island as well as to the west.

2.2.23 In summary, as similarly evidenced by the walking catchments, the Kingsland and Cae Glas locations offer excellent opportunities to access existing facilities by cycle, using more appropriate infrastructure. Such wealth of access options by cycle include the entirety of Holyhead and its connection to national and international travel opportunities from the rail and ferry terminal respectively as part of a multi-modal trip.

2.2.24 The *Wylfa* catchment study for cycling has highlighted a clear lack of local existing facilities and whilst Amlwch is accessible within a 40 minute cycle ride of the site, some of the surrounding highway that would be used by cyclists is narrow and could dissuade workers from making such journeys by cycle.

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Car Parking

2.2.25 I have reviewed Section 7 of the HNP document Transport Assessment – Site Wide Effects. A total of some 1887 car parking spaces are proposed on the Wylfa site.

2.2.26 Across the island as a whole there will be 3800 car parking spaces. Of this overall provision, an expected demand of 1705 cars is quoted as being associated with on-site resident workers. It is suggested within the above referenced document that 936 of those 1705 cars would be likely to park at the Dalar Hir P&R facility with the remaining 769 cars parking on site at Wylfa.

2.2.27 There appears to be no supporting explanation provided with regard to the basis upon which the proportional split of the 1705 cars was defined.

2.2.28 Therefore, notwithstanding that a figure of 311 car parking spaces were added (within the overall 1887 on site total) in order to provide resilience and flexibility during the project's delivery, the seemingly arbitrary split of the 1705 cars associated with on-site resident workers across the Dalar Hir and Wylfa site would appear to raise a question mark against the appropriateness of the on-site provision at Wylfa.

2.3 Area of Concern 3: The departure of traffic from the Wylfa Campus TWA site to the mainland/ Ireland.

2.3.1 From a review of the DCO and its supporting documents there does not appear to be a comprehensive assessment of the potential traffic impact of workers departing from their places of residence on return to their place of permanent residence.

2.3.2 It is felt that such activity could occur in significant numbers which would cause adverse impacts which have to date not been addressed by the HNP submission.

2.3.3 HNP should identify the likely peak time of day / day of week for this activity and then quantify and assess these specific traffic impacts.

2.3.4 This activity is highly likely to be compounded if the TWA is located in high numbers on campus at Wylfa because of the expected increase in workers' desire to escape the confines of the campus and its unwelcoming environmental conditions such as the significant noise levels.

2.4 Area of Concern 4: The traffic impact upon the rural road network to the east and central areas of Anglesey.

2.4.1 Locating large numbers of workers within the Wylfa site creates a potential risk that the associated car traffic may not solely follow the expected main route along the A55 to Valley before heading north along the A5025 to Wylfa (and the reverse for drivers' return to mainland uk).

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2.4.2 Instead, as indicated by Image 2.1 below, we suggest that a considerable proportion of the generated car traffic may elect to follow alternative routes across the island in order to travel from the Menai Straight Bridge Crossings to Wylfa and vice-versa.



Image 2.1 – Indicative drive times and distances. Source: Google Maps

2.4.3 From a review of Image 2.1 it is apparent that alternative routes exist for drivers to traverse the island from the Menai Straight Bridge Crossings to Wylfa which can be between 6 and 7 miles shorter over that overall distance.

2.4.4 It is acknowledged that at periods of low traffic flow, the A55 route may be attractive due to its quicker journey time. However, at times of heavier traffic flow and congestion the alternative, shorter, more rural routes are likely to become more attractive.

2.4.5 In-car Satellite Navigation systems which respond to live traffic information will play their part in diverting drivers onto these rural routes.

2.4.6 The potential impact upon the rural highway infrastructure, especially within the small towns and villages along those alternative routes, has not been properly considered within the DCO and its supporting documents.

2.4.7 By comparison, the propensity for impacts to be felt within those rural areas, should large numbers of workers be instead located at the L&L Development areas, is vastly reduced given these sites' adjacency to the A55 trunk road corridor.

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2.5 Area of Concern 5: Travel Times

2.5.1 With regard to home-based workers' daily commute to Wylfa, the submitted documentation to support the DCO refers to a travel time of up to 90 minutes (each way) as being a safe drive time prior to and following an 11 hour working day.

2.5.2 Within HNP document Workforce Accommodation Strategy at Para. 7.15 it states that:

"A key consideration has been the health and well-being of the construction workforce – the vast majority of the construction roles would involve long shifts of physical labour. On-site accommodation will reduce workers' commuting time, and enable longer rest periods for workers."

2.5.3 Furthermore, within HNP document Workforce Accommodation Strategy at Para. 7.1.9 it states that the provision of on-site accommodation for up to 4000 workers:

"...will be a significant project benefit because...it reduces travel times for workers and so will increase wellbeing, on-site productivity and reduce health and safety risks."

2.5.4 Yet the HNP proposals include an expectation that up to 2000 home-based workers may safely commute for up to 90 minutes after such long shifts of physical labour.

2.5.5 The HSE publication "Managing shiftwork, Health and safety Guidance" states the following with regard to fatigue-related errors and accidents:

"It is important not to underestimate the potential risk for serious fatigue-related errors and accidents. Sleepiness is thought to be the cause of up to one in five accidents on major roads in the UK, contributing significantly to the approximate 3000 road deaths recorded annually. After young men, shift workers are considered to be the category of drivers most at risk from accidents and, compared to day workers, night workers are more likely to be involved in accidents while driving home from work."

2.5.6 On this basis, I would seriously question whether the welfare and safety of workers and other road users has been considered in relying on a travel time of up to 90 minutes (each way).

3.0 Summary & Conclusion

3.1 Summary

3.1.1 There The L&L Development is located in a sustainable location which will promote a good quality of life for occupants of the TWA, the HNP proposal is not in a sustainable location and workers sited there will seek to travel away from the area to a greater degree than if the TWA were located at the L&L Development.

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- 3.1.2 The traffic impacts of the L&L Development have been thoroughly assessed and that a robust s106 agreement is in place to mitigate the development's impacts.
- 3.1.3 The coach activity associated with a 4000 bed TWA at the L&L Development is forecast to only manifest itself as approximately 21 return coach journeys during a typical network peak hour period. This number of movements can easily be accommodated on the highway network surrounding the site.
- 3.1.4 The site selection process and its conclusions are significantly flawed.
- 3.1.5 The potential traffic impacts of the Wylfa Campus workers' accommodation for up to 4000 staff, particularly the traffic movements associated with workers' departure from the island to visit their permanent place of residence, have not been fully assessed. In addition, potential exists for unnecessary traffic impacts on routes which are less appropriate to experience increases in traffic in order for workers to gain access from the mainland in comparison to the predominant use of the A55 trunk road network to access the L&L Development.

3.2 Conclusion

- 3.2.1 Providing a balance of TWA, with a core provision at the Campus for key workers along with the majority of the TWA located at the L&L Development sites would ensure that an available, sustainable and most suitable site is selected for the benefit of the workers.
- 3.2.2 Locating the majority of the TWA provision at the Cae Glas and Kingsland sites would minimise the potential for traffic impacts to be felt along rural roads and within villages across the island. It would also offer an improved quality of life for workers who would temporarily reside on the island, assisting with staff wellbeing and staff retention rates.

Our Locations

Birmingham

2 The Wharf
Bridge Street
Birmingham
B1 2JS
T. 0121 643 4694
birmingham@curtins.com

Kendal

28 Lowther Street
Kendal
Cumbria
LA9 4DH
T. 01539 724 823
kendal@curtins.com

Bristol

Quayside
40-58 Hotwell Road
Bristol
BS8 4UQ
T. 0117 302 7560
bristol@curtins.com

Leeds

Rose Wharf
Ground Floor
Leeds
L29 8EE
T. 0113 274 8509
leeds@curtins.com

Cardiff

3 Cwrt-y-Parc
Earlswood Road
Cardiff
CF14 5GH
T. 029 2068 0900
cardiff@curtins.com

Liverpool

51-55 Tithebarn Street
Liverpool
L2 2SB
T. 0151 726 2000
liverpool@curtins.com

Douglas

Varley House
29-31 Duke Street
Douglas
Isle of Man
IM1 2AZ
T. 01624 624 585
douglas@curtins.com

London

40 Compton Street

London
EC1V 0BD
T. 020 7324 2240
london@curtins.com

Dublin

39 Fitzwilliam Square
Dublin 2
Ireland
T. 00353 1 507 9447
dublin@curtins.com

Manchester

Merchant Exchange
17-19 Whitworth Street West
Manchester
M1 5WG
T. 0161 236 2394
manchester@curtins.com

Edinburgh

1a Belford Road
Edinburgh
EH4 3BL
T. 0131 225 2175
edinburgh@curtins.com

Nottingham

56 The Ropewalk
Nottingham
NG1 5DW
T. 0115 941 5551
nottingham@curtins.com

Glasgow

Queens House
29 St Vincent Place
Glasgow
G1 2DT
T. 0141 319 8777
glasgow@curtins.com