

From: [REDACTED]
To: [Stephens, Jake](#); [Wylfa Newydd](#)
Subject: Written representation - deadline 4
Date: 17 January 2019 09:09:03
Attachments: [NMU ISH comments with diagrams FINAL 3.pdf](#)

Bore da Jake,
Dyma'r WR parthed NMU yn dilyn y grandawiadau wythnos diwethaf ym Mae Trearddur.
Cofion,
Dafydd

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Wylfa Newydd DCO Examination

DCO Issue Specific Hearing (ISH) – Dafydd Griffiths on behalf of the NACP

Traffic and Transport – Non-Motorised Users (NMU)

First of all can we thank the panel for including an agenda item during the ISH focusing specifically on the impact of the Traffic and Transport proposals “on non-motorised users and what provision has been made in the Application for non-motorised users”. It is the NACP’s view that the negative impact on Non-Motorised Users (NMU) of road ‘improvement’ schemes is often underestimated and appropriate mitigating provision is not secured.

The oral representation on day 2 of the ISH examination was an opportunity to raise concerns about the impact of the increase in traffic load on the A5025 in the immediate vicinity of the WNDA on NMU. This representation expands on the concerns raised and outlines the NACP’s concerns for NMU using the A5/A5025 between Junction 3 of the A55 and Cemaes.

At the request of Ms Fernandes diagrams have been included of the sections of the A5025 where, in the NACP’s view, the impact on NMU has not been fully considered by the applicant.

Unfortunately, the chair’s other request to arrange direct discussions with the applicant to seek to resolve the issues raised has not yet been possible. However, it was agreed with the applicant’s consultant that following receipt of the deadline 4 written representation opportunities for further discussion could be arranged. The NACP have formally requested a meeting with Horizon and its consultant to discuss the impact of the A5/A5025 improvements on NMU.

The panel will be aware of the comments presented as a written representation at deadline 2. Unfortunately the applicant’s generic response at deadline 3 to the comments did not address NACP’s concerns. It is not intend to repeat in detail the points that were made in the written representation at deadline 2 but the NACP do want to highlight key areas where the current proposals for NMU differ from statements made by the applicant during the pre-application consultation phase.

When the formal Pre-consultation stages began the NACP was reassured to see the following recorded in the Integrated Traffic and Transport Strategy (APP-040).

“The principles of the draft ITTS seek to:

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

(First bullet point of 10)

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

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

(Fifth bullet point of 7)

However, with each iteration of the pre-application consultation, the NACP began to feel less and less reassured that sufficient weight was being given to these original principles and continue to do so.

At the Hinkley Point C DCO Examination representations were made that the increase in speed, volume and make up of traffic would make the main construction traffic routes more hazardous for

Non-Motorised Users. The developer recognised this and the s106 agreement negotiated with the local authority provided significant funding specifically for 'Walking and Cycling Improvements'. There is currently no such specific provision in the draft Wylfa Newydd s106 agreement.

The UK population is being encouraged to be more active by the NHS and Governments at a Wales and UK level. There is clear evidence that being more active is good for both physical and mental wellbeing. Also, using low carbon, sustainable means of travel by walking and cycling shorter distances is a goal set by the government in Wales. This goal is supported by specific legislation in Wales – the Active Travel (Wales) Act 2013.

Access to motorised transport is not universal on Anglesey. However, due to a lack of public transport and its rural nature, household access to a vehicle is relatively high. It was 98th out of 348 Local Authorities (2011 Census Data). 82% of households had access to a vehicle. However, 18%, a significant number of households, do not have any access and of the 82% who have the use of a vehicle the access may be limited and only available to some family members at certain times of the day.

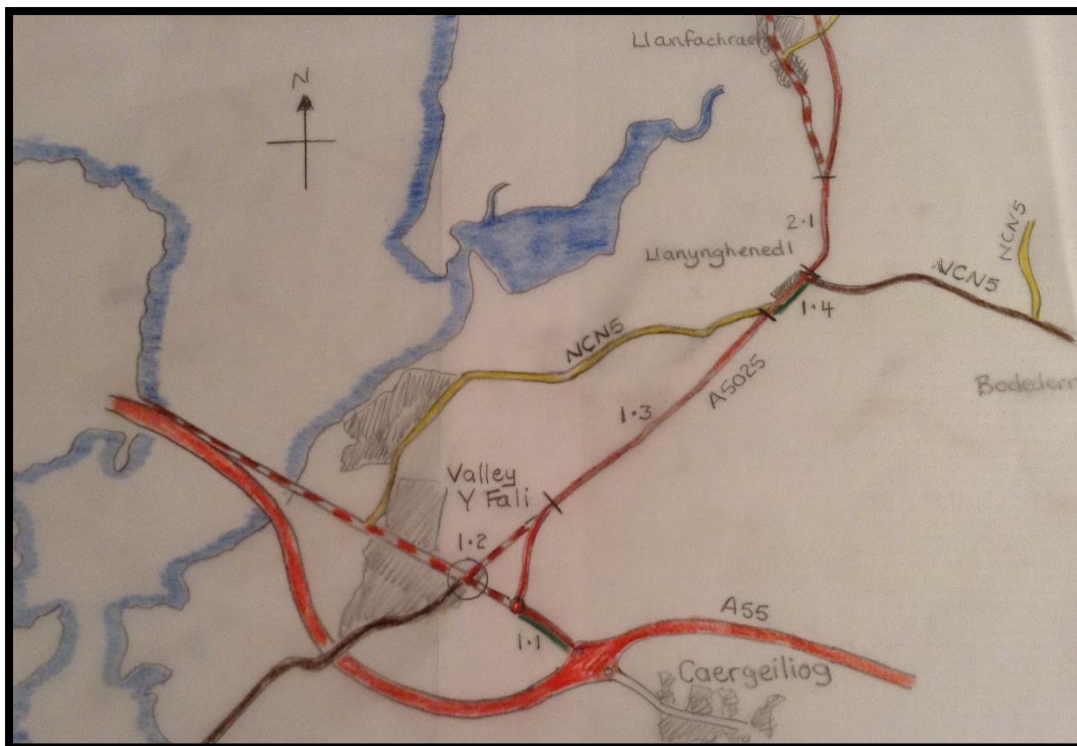
It is for these reasons that the provisions made by the applicant for Non-Motorised Users should be examined thoroughly and appropriate mitigation negotiated.

Having examined the applicant's deadline 3 comments the NACP continue to be of the view that, as they currently stand, the work to the A5025 does not deliver a cohesively considered package of highway improvements for NMU. Indeed, the increase in speed, volume, and HGVs and buses making up a much larger percentage of the traffic will be detrimental to NMU attempting to use certain sections of the A5025 / A5.

The NACP wish to comment on the current proposals based on the following geographical areas.

- Valley area
- Llanynghenedl to Llanfachraeth
- Llanfaethlu in the direction of Rhydwyn / Llanrhyddlad
- Nanner Road to the WNDA Roundabout and onward to Tregele and Cemaes

Valley Area



New Valley roundabout area (1.1 on diagram)

The NACP's first area of concern is the proposed NMU infrastructure south east of the proposed new roundabout at Valley on the A5. Both the original DAS (APP-410) and the revised version 2 (REP2-030) reference the following as the applicant's response to Stage Two Pre-Application Consultation.

"3.2.44 The following amendments were made following this stage of consultation: • Section 1: The proposed roundabout junction would be located on-line (to be constructed as part of the existing A5 highway) A cycling and pedestrian path to the south of the roundabout and away from the carriageway edge is now proposed to increase pedestrian and cyclist safety."

A note in the current plans as submitted indicate the following "EXISTING FOOTWAY TO REMAIN AND BE REDESIGNATED AS SHARED FOOTWAY" (APP-019 - WN0902-HZDCO-OHW-DRG-00002). On the 6th January 2019 the footway on this section was measured at several locations. The majority is between 1.8 and 1.4m wide and does not meet the standard that would be expected of a two way shared cycleway / footway. "The preferred minimum width for an unsegregated facility is 3.0m." However, "unsegregated shared facilities have operated satisfactorily down to 2.0m wide with combined pedestrian and cycle use of up to 200 per hour". (Design Manual for Roads and Bridges DMRB Volume 6, Section 3, Part 5, 7.16)

The use of the phrase "away from the carriageway edge" is misleading. What appears to be proposed is simply re-designating the narrow footway that runs between the two roundabouts as a cycling / pedestrian path.

Examining the drawings as submitted it is not clear what is proposed as NMU infrastructure between the new roundabout and the Valley traffic lights.

It is important that facilities for cyclists are of an appropriate standard. NACP's understanding is that should an accident occur to a cyclist riding in the main carriageway when cycling provision is provided they may be open to a claim of contributory negligence. (Dann v Brackman)

The current proposals are unacceptable and further appropriate mitigation is required.

Valley Traffic Light junction (1.2 on diagram)

The Road Safety Audit proposal recommends the following – “positively direct all cycle traffic along the old A5025”. It is not clear what modifications are proposed to the traffic light phasing at Valley junction, how the lights would be triggered by cyclists and how it is envisaged that cyclists would interface with the cycle infrastructure proposed in 1.1 above.

The NACP seek further clarification on this matter.

Valley link to Llanynghenedl (1.3 on diagram)

The applicant notes the following: (APP-307)

“4.3.18 Valley is a designated locality under the Active Travel (Wales) Act 2013 and it is considered that all roads within the study area form part of a network of connections to Valley and to Holyhead (which is within cycling distance of Valley) and have been assigned a medium value.”

The applicant's current proposals enable cyclists and pedestrians to make use of the 'old' section of the A5025 from the Valley Traffic Lights in the direction of Llanynghenedl. The proposals provide a cyclist / pedestrian 'crossing point' where the new Off-line section meets the A5025 towards Llanynghenedl. During the 10 year construction phase the proposal requires cyclists and pedestrians to share the carriageway with an increased volume of A5025 motorised traffic over a 1.5km section of the A5025. It could be argued that additional provision on this route duplicate the NCN Route 5 between Valley and Llanynghenedl. However, NCN Route 5 skirts the north of Valley. The potential new route links directly to the main shopping area in Valley and a direct route in the direction of Caergeiliog.

It is the NACP's view that the lack of a cycleway / footway in the current proposals are unacceptable and further appropriate mitigation is required.

Joint use footway / cycleway at Llanynghenedl (1.4 on the diagram)

The NACP note the drawings of the proposed joint use cycleway / footway that form part of NCN Route 5 at Llanynghenedl. Drawing WN02.05-ACM-S2-00-DRG-003¹ has two 10 m sections of limited width (1.5m and 1.2m) due to the current location of two electricity poles that also light the area. It is the NACP's view that it would be more appropriate for the applicant to arrange for the poles to be relocated at the earliest opportunity to facilitate a minimum 2m width along the full length of this facility.

Llanynghenedl to Llanfachraeth (2.1 on the diagram)

In the summer of 2018 the NACP became aware that footway / cycleway provision between Llanynghenedl and Llanfachraeth had been discussed at a meeting on 5th July 2016 to present Horizon's Cycling Position Statement to IACC and Sustrans. The meeting note records two key issues that were raised but it does not record who raised these matters.

- *“Segregated cycle provision on the east verge of the A5025 at Llanfachraeth was discussed.*
- *Provision of a Bodedern to Llanfachraeth cycleway / footway was raised as part of a potential enhancement strategy.”*

The meeting is recorded in the document “Wylfa Newydd Project A5025 On-line Highway Improvements Environmental Report – Volume 3A – Appendix 3.2”. This is available on the Horizon consultation website.

A request for further information received the following response from the IACC.

“The current Horizon proposals for the Llanfachraeth bypass do not include a cycle route as it would not connect to any other existing cycle routes and it is not an Active Travel route.”

The NACP draw the panel’s attention to Llanfachraeth being within Active Travel cycling distance of Valley and Holyhead. Both are designated localities under the Active Travel (Wales) Act 2013.

“Horizon is not proposing any links to Bodedern as it is not part of the proposed construction traffic route.”

The NACP note that Bodedern is only about 250m from the route of NCN Route 5. A link between Llanfachraeth and Llanynghenedl would create the link to Bodedern.

The NACP would draw the panel’s attention to (APP-307) that first became available to the general public on publication of the DCO documentation on the Planning Inspectorate website.

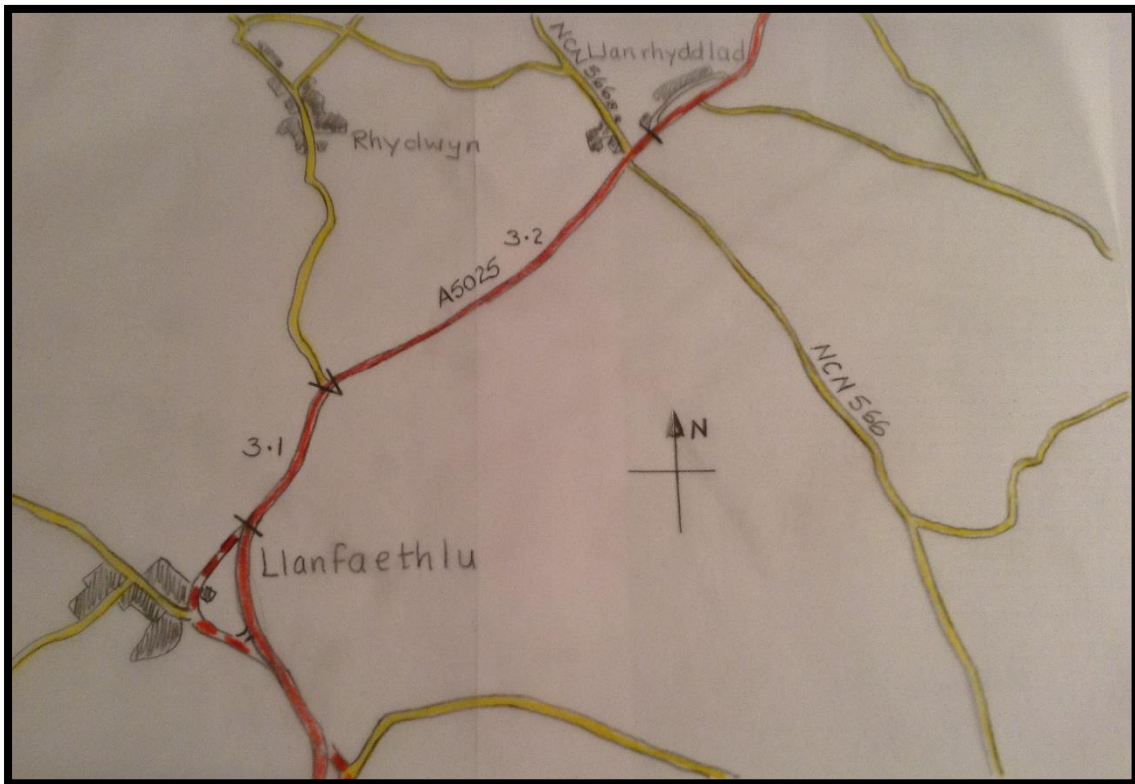
It notes the following:

“4.3.32 The A5025 within section 3 provides an important link between communities, primarily Llanfachraeth, Valley, Holyhead and Llanfaethlu. Valley and Holyhead are designated localities under the Active Travel (Wales) Act 2013 and Llanfachraeth lies within 8km of these communities. Unlike with recreational walkers and cyclists, typically active travel users would seek to take a more direct route and are therefore less influenced by the attractiveness of a route.”

The applicant notes that Llanfachraeth is within Active Travel distance of Valley and Holyhead. But under the current proposals Active Travel users would have to use the main A5025 carriageway when travelling between the outskirts of Llanfachraeth and Llanynghenedl. The applicant’s documentation notes that the volume of traffic will increase significantly, that the traffic will be travelling faster and that traffic will have a higher percentage of HGVs and buses than currently experienced. There are no appropriate alternative routes that Active Travel users could use for the journey.

It is the NACP’s view that the current proposals are unacceptable and further mitigation is required.

Llanfaethlu in the direction of Rhydwyn / Llanrhyddlad



Llanfaethlu link to Rhydwyn / Llanrhyddlad (3.1 on diagram)

At Llanfaethlu the applicant notes the following (APP-307)

“4.3.51 Children previously attending primary schools in Llanfachraeth, Llanfaethlu and Llanrhyddlad have recently transferred to Ysgol y Llannau, a new school in Llanfaethlu.”

The school is now named Ysgol Rhyd y Llan.

“4.3.52 It is feasible, though considered unlikely, that children based in the nearby communities of Llanrhyddlad and Rhydwyn would travel to and from Ysgol y Llannau by foot or cycle though in Wales children of primary school age who live further than 2 miles (3.2km) from school are provided with free transport and so are unlikely to travel by active travel. Currently, there are no footways along the A5025 within section 5, and therefore, children walking and cycling would need to travel in the carriageway. On the basis that the Active Travel (Wales) Act 2013 requires consideration to be given to active travel when considering new highway schemes, the A5025 within section 5 that would provide a route for active travel journeys to Ysgol y Llannau from Llanrhyddlad and Rhydwyn has been assigned a high value for active travel purposes.”

At 4.3.52 the applicant has identified that consideration must be given to Active Travel when considering new highway schemes and has assigned a high value for travel from Llanrhyddlad / Rhydwyn to Llanfaethlu (Ysgol Rhyd y Llan). The distance from Ysgol Rhyd y Llan to Rhydwyn and Llanrhyddlad are within 2 miles of the new school. Therefore, the provision of free transport under the 2 mile category would not apply. IACC education department may have made an exception but the NACP are not party to that information. The confusion may be due to the old school at

Llanfaethlu being quite some distance to the west of the centre of the village. The new Ysgol Rhyd y Llan is much nearer the centre of Llanfaethlu and slightly to the east thus reducing the distance.

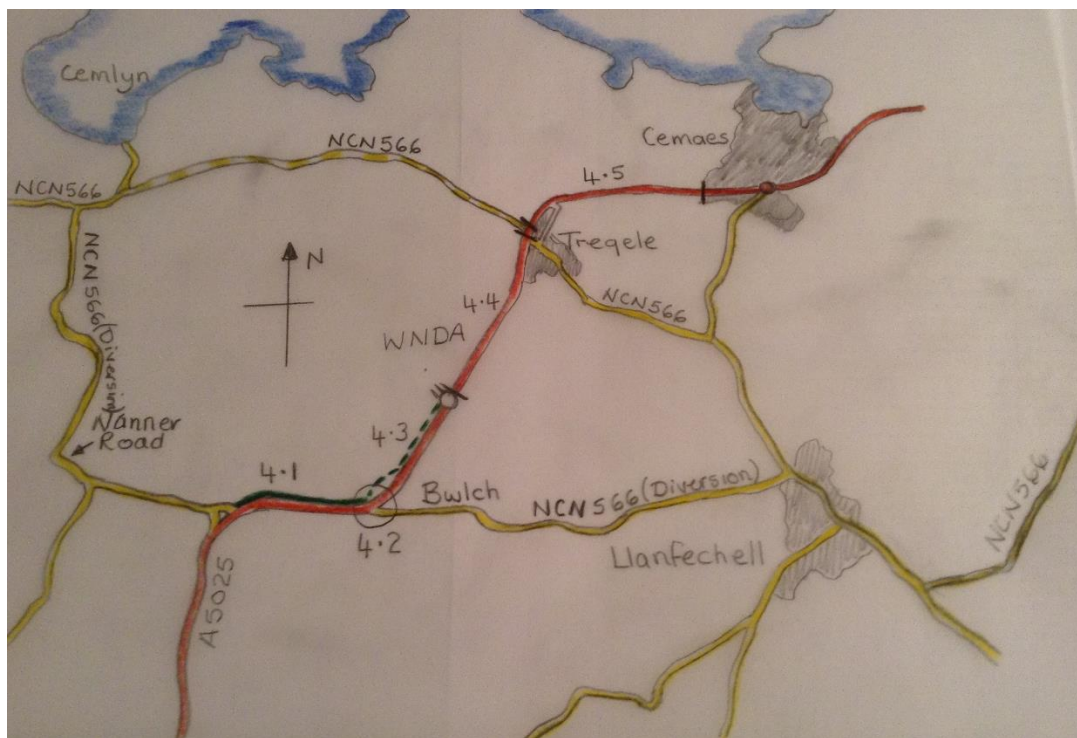
The distance between the northern end of the section 5 off-line improvements and the turn off for Rhydwyn is approximately 700 metres. Llanrhyddlad is a further 1500 metres.

In addition, the northerly exit from the 'old' A5025 at Llanfaethlu notes a 'proposed gate to maintain pedestrian access to the village'. It is the NACP's view that this gate must also be designed to accommodate the passage of cycles. (APP-021)

The applicant notes that both Rhydwyn and Llanrhyddlad are within Active Travel distance of Llanfaethlu. Under the current proposals Active Travel users would use the main A5025 carriageway when travelling from Llanfaethlu to Rhydwyn / Llanrhyddlad. The applicant's documentation notes that the volume of traffic will increase significantly, that the traffic will be travelling faster and that traffic will have a higher percentage of HGVs and buses than currently experienced. There are no appropriate alternative routes that cyclists or walkers could use for the journey.

It is the NACP's view that the current proposals are unacceptable and further mitigation is required.

Nanner Road to the WNDA Roundabout and onward to Tregele and Cemaes



Nanner Road to 23a/24 junction at Bwlch (4.1 on diagram)

At deadline 2 the 500 metre joint use footway / cycleway alongside the A5025 between Nanner Road and the Bwlch turn off towards Llanfechell was noted. This is needed due to the Cemlyn Road section that was previously used by the NCN Route 566 having to be closed due to it crossing the site of the proposed development. Confirmation has recently been received from the applicant that this section will be actioned under the TCPA at the same time as resurfacing work in the area.

Bwlch junction (4.2 on diagram)

The NACP do remain concerned about the positioning of the NCN 566 crossing at Bwlch (junction 23a/24). Whilst the sight line in the direction of Valley is recorded as over 160m the sight line in the direction of the WNDA is only a little over 40m. Unless vegetation at the side of the road is cleared and regular maintenance carried out this sightline distance is dangerous. (For information - 60mph is 26.8 metres/second). The NACP's concern is supported by a road safety audit in the DCO documentation. (APP-112)

It is the NACP's view that the arrangement of any shared cycleway / footway near this location, the signage, speed limit and the exact position of the crossing needs more careful consideration.

Bwlch Turn Off (Junction 23a / 24) to the WNDA Roundabout (4.3 on diagram)

At deadline 2 four proposals for NMU infrastructure improvements were welcomed. Unfortunately, following further investigation of the A5025 documentation it appears that one of the four "the 500 metre joint use footway / cycleway alongside the A5025 between the Bwlch turn off to Llanfechell and the new roundabout at the WNDA" is now a "potential future" proposal. Plan WN02.05-ACM-58-00-DRG-002 R1² (available on the Horizon website) notes "verge to be widened to accommodate potential future permanent diversion of National Cycle Route 566 following the closure of Cemlyn Bay Road".

The applicant was emailed on 6th December 2018 requesting further information about the proposals.

A confusing reply was received on 6th January 2019.

"Phase 1 will be carried out as part of the A5025 On-line Highway improvements consented through the TCPA and will see the temporary diversion of the cycle route to the junction leading to Llanfechell. The second phase which will be carried out as part of the off-line works will see the cycle route permanently diverted through the existing layby (which will be resurfaced) and alongside the A5025 to the power station access."

To clarify: Phase 1 is Nanner Road to the Bwlch turn off at 23a / 24. Phase 2 is 23a / 24 to the proposed WNDA roundabout.

There appears to be confusion about the temporary and permanent routes of the NCN 566. This needs further discussion between the applicant, NACP, IACC and appropriate cycling organisations to agree what is in the best long term interest of the local community.

New WNDA Roundabout to Tregle and Cemaes (4.4 and 4.5 on diagram)

The email of 6th December also asked for clarification of the applicant's previous proposals to link the proposed WNDA roundabout to Tregle and Cemaes. The email confirmed that *"it is no longer proposed to put in place a shared use footway / cycleway in this location as reported as an option at PAC 3"*. Only a footway is now proposed.

The NACP would make three comments about the lack of a cycle link to Tregle and Cemaes.

Firstly, if the route via the Wylfa Newydd main entrance roundabout is to become the 'permanently diverted' route of the NCN Route 566 then how will cyclists be expected to travel between the roundabout and Tregle to rejoin the current route?

Secondly, the provision of a safe route alongside, but not within the carriageway for construction workers and operational staff between Cemaes, Tregele and the WNDA would in part address the Welsh Governments Active Travel goals for more sustainable travel.

Lastly, such a route would also enable cyclists on the NCN 566 and visitors to the Wylfa Newydd Visitor Centre to safely access, via an alongside carriageway / off carriageway route, the facilities in the villages of Tregele and Cemaes and would result in economic benefit to the local area.

Once again the current proposals are unacceptable and further mitigation is required.

The NACP look forward to receiving the applicant's considered response.

Dafydd Griffiths
On behalf of NACP

References

¹[https://www.horizonnuclearpower.com/files/downloads/Public%20Documents/Online%20Roads/Planning%20Documents/Proposed%20General%20Arrangements%20\(8\).pdf](https://www.horizonnuclearpower.com/files/downloads/Public%20Documents/Online%20Roads/Planning%20Documents/Proposed%20General%20Arrangements%20(8).pdf)

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²[https://www.horizonnuclearpower.com/files/downloads/Public%20Documents/Online%20Roads/Planning%20Documents/Proposed%20General%20Arrangements%20\(8\).pdf](https://www.horizonnuclearpower.com/files/downloads/Public%20Documents/Online%20Roads/Planning%20Documents/Proposed%20General%20Arrangements%20(8).pdf)

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