



## Wylfa Newydd Project

Horizon Deadline 4 responses to actions set in  
Issue Specific Hearing on 8 January 2019

PINS Reference Number: EN010007

17 January 2019

Revision 1.0

Examination Deadline 4

Planning Act 2008

Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

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# **1 Horizon Deadline 4 responses to actions set in Issue Specific Hearing on 8<sup>th</sup> January 2019**

## **1.1 Introduction**

- 1.1.1 This document contains Horizon Nuclear Power Wylfa Limited's ("Horizon") responses to actions set in the Issue Specific Hearing on 8<sup>th</sup> January 2019 that were set for Deadline 4.
- 1.1.2 This document also contains details of other actions set at the Issue Specific Hearing on 8<sup>th</sup> January 2019 set for subsequent Examination Deadlines.

## **1.2 Summary of Deadline 4 action responses**

### ***Potential Cumulative Impact of National Grid Connection traffic on A5025***

- 1.2.2 Contained in Appendix 1-1 is Horizon's response to the action to provide additional detail on the assessment Horizon undertook regarding the cumulative impact of the National Grid Connection Project and the Wylfa Newydd DCO Project on the A5025.

### ***Post Hearing Submission – Wales Coast Path***

- 1.2.3 Contained in Appendix 1-2 is Horizon's response to the request by the Examining Authority for a post-hearing note detailing Horizon's proposed diversions to the Wales Coast Path during construction and operation of the Wylfa Newydd DCO Project.

### ***Land and Lakes – Post-hearing note***

- 1.2.4 Contained in Appendix 1-3 is Horizon's response to the report "Traffic and Transport Matters" [REP2-248] dated 4<sup>th</sup> December 2-18, submitted into Examination by Land and Lakes Ltd.

## **1.3 Action responses planned for subsequent Examination Deadlines**

- 1.3.1 Table 1-1 summarises the responses to actions set at the Issue Specific Hearing on 8<sup>th</sup> January 2019 that Horizon is planning to submit at subsequent deadlines.

**Table 1-1 Summary of planned action responses**

Action / Deliverable	Planned deadline
A post-hearing note detailing Horizon's proposed communication strategies and how these communication mechanisms will integrate communication between construction vehicles and emergency services.	Deadline 6
A post-hearing note following further engagement with Welsh Government clarifying Horizon and Welsh Government's respective positions on HGVs crossing Britannia Bridge during peak commuting hours.	Deadline 5
A post-hearing note describing how Horizon intends to achieve compliance with the DCO through its contractual arrangements.	Deadline 5



## Wylfa Newydd Project

### Potential Cumulative Impact of National Grid's North Wales Connection traffic on A5025

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# **1 Potential Cumulative Impact of National Grid's North Wales Connection traffic on A5025**

## **1.1 National Grid Traffic – Potential Usage of A5025**

- 1.1.1 Since Deadline 3 (18 December 2018) there have been further discussions with AECOM who are the transport advisors to National Grid's North Wales Connection project. As part of these discussions further information has been obtained concerning the potential period when construction vehicles associated with the North Wales Connection project would use the A5025 between the Valley and the Wylfa Newydd Development Area (WNDA).
- 1.1.2 It is now understood that construction traffic associated with the North Wales Connection project is expected to be required to use the A5025 between Valley and the WNDA from May 2022 onwards.
- 1.1.3 It is the current expectation of the Wylfa Newydd DCO Project that the A5025 Off-line Highway Improvements would be open by this date.
- 1.1.4 This means that the construction traffic associated with the North Wales Connection project would not affect the residents of Llanfachraeth and other locations bypassed by the A5025 Off-line Highway Improvements.
- 1.1.5 If the delivery of the A5025 Off-line Highway Improvements is delayed for some reason, the North Wales Connection project has the potential to use alternative routes or the National Grid haul road network to enable their construction traffic to reach relevant work sites.
- 1.1.6 In addition, Horizon (and its suppliers) and the North Wales Connection project will cooperate to minimise traffic impacts in accordance with best practice and current CDM regulations.
- 1.1.7 Traffic issues associated with the North Wales Connection project (including the cumulative impact of the North Wales Connection project and the Wylfa Newydd DCO Project) are also considered as part of the National Grid's application for a Development Consent Order which was accepted by the Planning Inspectorate on 4 October 2018.

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## Wylfa Newydd Project

Technical note regarding the diversion of the WCP during construction and operation

PINS Reference Number: EN010007

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### Appendix 1 Inland sections of the Wales Coast Path



# 1 Introduction

## 1.1 Proposed diversion of the Wales Coast Path

- 1.1.1 This post-hearing note has been prepared by Horizon following the Issue Specific Hearing on Public Rights of Way held on Tuesday 8 January 2019.
- 1.1.2 The purpose of this post-hearing note is to clarify Horizon's proposed diversion routes of the Wales Coast Path (WCP) during both construction and operation of the Power Station.
- 1.1.3 Secondly, this post-hearing note at section 6 responds to comments made by interested parties including the Isle of Anglesey County Council (IACC) and North Anglesey Councils Partnership that consideration should be had to an alternative seaward route for the WCP during operation.

## 1.2 The Wales Coast Path

- 1.2.1 The Wales Coast Path (WCP) is a long-distance trail that follows the entire coastline of Wales. Some sections of the route divert inland where access is restricted, as is the case where the path runs inland of the Existing Power Station. The Isle of Anglesey Coastal Path (which is now incorporated into the WCP) is an important resource for the county, both for local residents and tourists, and has been marketed as such with guidebooks and leaflets published to describe the route.
- 1.2.2 Natural Resources Wales (NRW) is responsible for the WCP and sets out criteria that should be taken into account when proposals for diversions of the existing route are being considered. These criteria are:
  - RC1 – There should be a continuous route around the coast of Wales;
  - RC2 – The public should have a permanent right of access;
  - RC3 – The route should be physically available at all times; and
  - RC4 – The route should be as close to the sea as practicable and desirable.
- 1.2.3 In describing the proposed diversion routes to the WCP during construction and operation, this note demonstrates how the proposed diversions meet these criteria.

## **2 RC1 - There should be a continuous route around the coast of Wales**

### **2.1 Existing Wales Coast Path**

- 2.1.1 The existing WCP is routed along the entire coast of Wales as a continuous route, though in numerous sections it is not on the actual coastline. At certain points there are spurs that are routed off the main WCP route to enable walkers to access specific coastal features. This is discussed further below in respect of RC4.

### **2.2 Proposed Diversion during Construction**

- 2.2.1 The proposed diversion during construction would maintain a continuous route around the coast of Wales, albeit heading inland around the construction site. In addition, given the local importance of Wylfa Head, Porth yr Ogof and Porth Wylfa to residents and visitors of Cemaes, a linear route along the coast to the north of the Wylfa Newydd Development Area (WNDA) would be maintained throughout, this would follow the existing alignment and using Public Rights of Way (PRoW) 20/002/4, 20/002/5, 20/002/2, 20/056/1 and 20/056/2. The proposed diversion during construction is shown in Figure D4-5 [APP-237].

### **2.3 Proposed Diversion during Operation**

- 2.3.1 The proposed diversion during operation would maintain a continuous route around the coast of Wales, albeit not on the coast. The route would be shorter than the diversion during construction and would be routed through the landscaped grounds of the WNDA. The link between Cemaes and Wylfa Head would again become part of the main route of the WCP and the Fisherman's Car Park would be reopened. The proposed diversion during operation is shown in Figure 7-1.

### **3 RC2 - The public should have a permanent right of access**

#### **3.1 Existing Wales Coast Path**

- 3.1.1 The existing Wales Coast Path in the vicinity of the Wylfa Newydd Development Area (WNDA) is a mixture of permissive routes, PRow and sections of road.
- 3.1.2 From the west, the Wales Coast Path from Cemlyn Lagoon follows a permissive route across National Trust land and links to the public right of way network at Porth y Felin. From Porth y Felin the WCP is routed through the WNDA to the Existing Power Station's access road. Where the route joins the access road it becomes a permissive route along the road for a short distance and then heads north and along the Wylfa Nature Trail to Fisherman's Car Park.
- 3.1.3 At that point the route follows PRow to Wylfa Head, where it once again becomes a permissive route. From Porth yr Ogof to Cemaes the route follows PRow. At Cemaes the WCP is routed along the promenade (road) before heading further east along the coast.
- 3.1.4 While the WCP across the National Trust land is permissive it is routed over Access Land and therefore the public have a right of access to it. The route along the Existing Power Station access road and along the Wylfa Nature Trail are permissive but there is a formal agreement with the IACC for them to be part of the WCP. However, they can still be closed without the requirement for footpath closure orders.

#### **3.2 Proposed Diversion during Construction**

- 3.2.1 The proposed diversion during construction would follow the shortest route possible while restricting access to the construction area.
- 3.2.2 The diversion route proposed assumes that many people walking the WCP would continue to walk along the permissive path between Cemlyn Bay and Porth y Felin and therefore starts from that point. However, for a shorter diversion, walkers could avoid this link, walking along the boundary of the WNDA from close to Cemlyn Bay.
- 3.2.3 The route follows the boundary of the WNDA and two cross sections of this route are shown below.
- 3.2.4 These routes are shown on the Rights of Way Plans [APP-012] and would become PRow where people would have a right of access for the duration of construction. They would be extinguished once the final 'operational' diversions are in place. The section of path around Wylfa Head would continue to be permissive.

### **3.3 Proposed Diversion during Operation**

- 3.3.1 The WCP would be diverted to a final alignment following the Power Station becoming operational, this route, along with other proposed PRow are shown on the Rights of Way Plans [APP-012] and would, once adopted by IACC, provide a permanent right of access.
- 3.3.2 The WCP route around Wylfa Head would continue to be permissive.

## **4 RC3 - The route should be physically available at all times**

### **4.1 Existing Wales Coast Path**

- 4.1.1 The existing Wales Coast Path in the vicinity of the WNDA is physically available at all times.

### **4.2 Proposed Diversion during Construction**

- 4.2.1 The proposed diversion would be physically available at all times.

### **4.3 Proposed Diversion during Operation**

- 4.3.1 The proposed diversion would be physically available at all times.

## **5 RC4 – The route should be as close to the sea as practicable and desirable**

### **5.1 Existing Wales Coast Path**

5.1.1 A review of Ordnance Survey mapping has been undertaken identifying other locations along the Welsh coast where the route heads inland to avoid industrial or military sites, see Table A-1 for further detail. Figure 7-2 shows the locations along the Welsh coastline where the WCP does not run along the coast. Listed below are those locations where access is restricted on industrial or military grounds:

- Holyhead Port;
- Caernarfon Airport;
- DERA Aberporth;
- Pembroke Dock;
- Artillery Range near Castlemartin (Pembrokeshire);
- Danger Area near Manorbier (Pembrokeshire);
- Danger Area between Pendine and Laugharne;
- Swansea Docks;
- Works at Crymlyn Burrows;
- Port Talbot steelworks;
- Barry Docks;
- Chemical Works (Barry);
- Cardiff Docks; and
- Newport Docks.

5.1.2 It also heads inland to avoid certain landownerships such as:

- Plas Newydd (Anglesey) – National Trust;
- Penrhyn Castle (Bangor) – National Trust; and
- Welsh Wetland Centre (Llanelli) – Wildfowl and Wetland Trust.

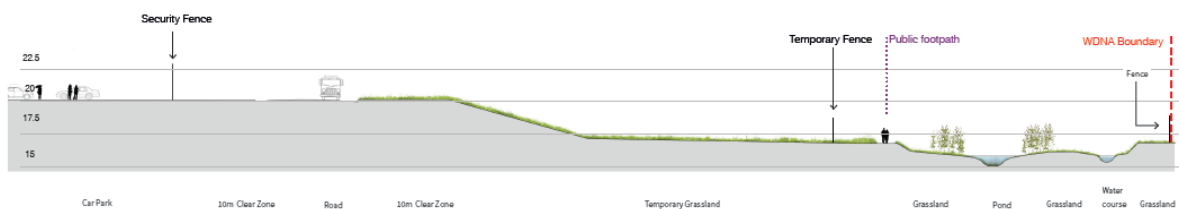
5.1.3 Appendix 1 illustrates in further detail three locations where the WCP heads inland for a relatively substantial distance, in excess of 6km, due to the presence of military, industrial or other landownerships on the coastline.

5.1.4 As can be seen, whilst there is an aspiration for the WCP to follow the coastline for its entire length this is not always viable or, for the purposes of recreational walkers, desirable.

## 5.2 Proposed Diversion during Construction

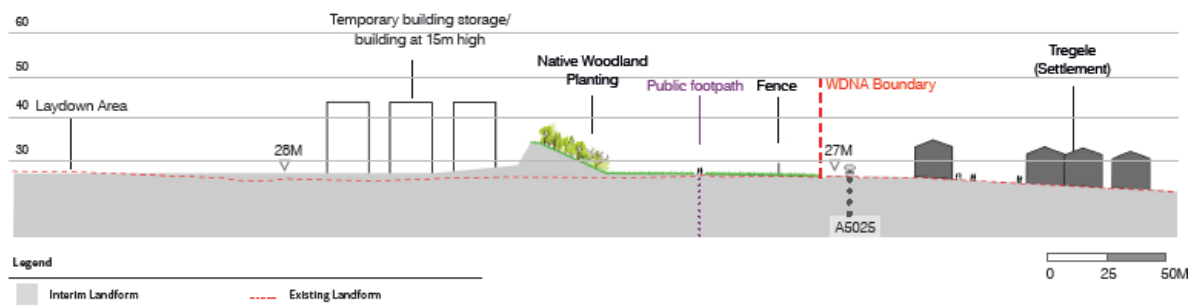
- 5.2.1 While the WCP would be routed inland around the WNDAs it would be as close as is practicable to the sea, given the health, safety and security requirements associated with a construction project of this type.
- 5.2.2 Horizon has acknowledged the importance of the route between Cemaes and Wylfa Head and on this basis has maintained this link throughout construction. On this basis, it is Horizon's opinion that the proposed diversion during construction is as close as practicable and desirable to the sea as is possible.
- 5.2.3 Figure 5-1 shows a cross section of the WCP along the Afon Cafnan during construction.

**Figure 5-1 Cross section of Wales Coast Path along the Afon Cafnan - construction**



- 5.2.4 The WCP would be routed parallel to the A5025 and this has been raised as a concern. Figure 5-2 shows that this section of the WCP would be routed within Horizon land and not along the verge of the road.

**Figure 5-2 Cross section of Wales Coast Path at Tregale – construction**

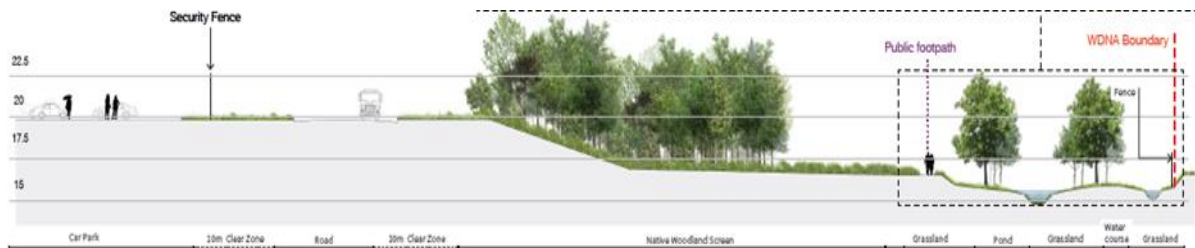


- 5.2.5 Overall, Horizon considers the proposed diversion during construction to be as close to the sea as is practicable and desirable. Where access to the sea is possible it would be provided, where the WCP is routed inland such landscaping work, as is practicable in the early stages of construction, would be undertaken.

## 5.3 Proposed Diversion during Operation

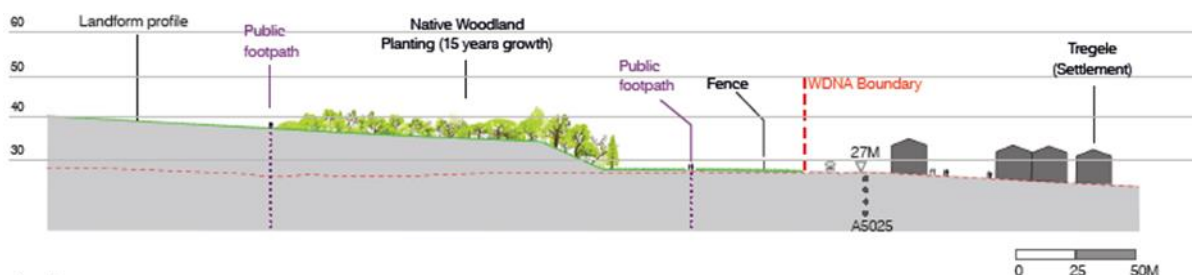
- 5.3.1 The proposed diversion during operation has sought to find a suitable route that maintains the security of the Power Station whilst also providing an attractive route for walkers.
- 5.3.2 The proposed diversion would start at Porth y Felin, assuming that the majority of walkers would choose to walk along the National Trust headland from Cemlyn Bay. However, should walkers want to have a shorter route from Cemlyn Bay they can utilise other proposed PRoW within the WND.
- 5.3.3 From Porth y Felin, the route would follow the Afon Cafnan between two landscaping mounds. Views of the Power Station would be limited, with views from the route being of the landscaped mounds.
- 5.3.4 Heading further east, the WCP would be routed closer to the boundary of the Power Station, continuing to follow the route of the Afon Cafnan. A cross section of the WCP at this location is shown in Figure 5-3.

**Figure 5-3 Cross section of Wales Coast Path along the Afon Cafnan - Operation**



- 5.3.5 The WCP would then split; one route would provide a link to the proposed visitor centre, the other would be a continuation of the route towards Wylfa Head. The currently proposed diversion is for the WCP route to be to the east of the WND close to Tregelle, though there would be an alternative footpath which would run parallel, but closer to the Power Station. Both paths would be available for walkers. Figure 5-4 shows a cross section of the WND between Tregelle and the Power Station which shows the two footpaths.

**Figure 5-4 Cross section of Wales Coast Path near Tregelle**





- 5.3.6 From this point the WCP heads north towards the Fisherman's Car Park, which would be reopened once the landscaping work is completed. From the Fisherman's Car Park the WCP would be surfaced towards Porth yr Ogof to enable those people with limited mobility to access the headland. At Wylfa Head the route would reconnect with the existing alignment.
- 5.3.7 The proposed route of the WCP would also be linked to the existing view point on Dame Sylvia Crowe's mound, utilising a spur link from the path.

## **5.4 Additional Mitigation**

- 5.4.1 In addition to the proposed diversions of the WCP new PRoW would be created within the WNDA, which would be available once the Power Station is operational and all landscaping works are completed as shown in Figure 7-1.
- 5.4.2 Horizon intends to apply for planning permission for a visitor centre. This visitor centre would link to the Wales Coast Path and could provide facilities such as café and toilet facilities for people walking the routes as well as car parking as an entry point to the public rights of way network.
- 5.4.3 Picnic tables, a nature trail and interpretation boards would also be provided at certain locations within the WNDA, which would enhance the visitor experience.
- 5.4.4 The draft DCO s.106 Agreement [REP3-043] includes provision for a PRoW Capital Contribution which IACC may apply to implement improvements to the PRoW network, and a PRoW Networks Maintenance Contribution. These contributions will assist in mitigating any adverse effects on the WCP and wider PRoW network as a result of the DCO Project. The IACC will be able to utilise these funds to enhance the existing PRoW network including, for example, installing information/interpretation boards on or near the PRoW network, and undertake improvements to any section of the WCP on Anglesey.

## **6 Seaward Route**

6.1.1 A number of interested parties including IACC and NACP have suggested that an alternative seaward diversion routes for the WCP should be considered. Horizon has considered this option that would route the WCP along the coast between Porth y Felin and Wylfa Head, though it would have to be routed inland between the Existing Power Station and the Power Station. However, this option was found to be impracticable due to a number of factors set out below.

6.1.2 Consideration of how the proposed seaward option would compare to NRW's WCP rerouting criteria, along with positive and negative aspects of this option, are set out below.

### **6.2 RC1 – There should be a continuous route around the coast of Wales**

6.2.1 This seaward route would, subject to lease restrictions set out in section RC2, provide a continuous route around the coast of Wales and therefore would comply with this criterion.

### **6.3 RC2 – The public should have a permanent right of access**

6.3.1 The public would not be able to have a permanent right of access along the seaward route as Horizon would need to have the right to close the path as required. Therefore, the seaward route could only be a permissive route.

6.3.2 The seaward route would have to be closed to enable essential maintenance of the fish deterrent system, cooling water intake infrastructure and the skimmer wall. In addition, the route would cross the Marine Offloading Facility (MOLF), which at times could be operational. Whilst the MOLF would not be used on a regular basis access to the WCP would have to be restricted when it was in use.

6.3.3 Furthermore, the existing lease between the Crown Estate and Horizon restricts access by members of the public. In order to allow a footpath route across the skimmer wall and MOLF this lease would have to be renegotiated.

### **6.4 RC3 – The route should be physically available at all times**

6.4.1 As mentioned in section 6.3, Horizon would need to have the ability to close the seaward path in order to undertake maintenance and for the safe operation of the MOLF. Therefore, there would be significant periods of time each year that the route would not be available.

## **6.5 RC4 – The route should be as close to the sea as practicable and desirable.**

- 6.5.1 This route would be closer to the sea than the proposed diversion route. However, it would still be routed inland around the Existing Power Station as Horizon has no control over land belonging to the Nuclear Decommissioning Authority.
- 6.5.2 An enclosed walkway consisting of a 20mm mesh would be required in order to ensure operational safety and security against currently undefined future scenarios that could have a significant commercial impact due to enforced shutdown/outage of the nuclear power plant.
- 6.5.3 The walkway would be required across the skimmer wall as a minimum, this is a length of approximately 180 m. The size of the mesh would result in views from the walkway being severely impacted and would reduce the recreational amenity of the route significantly.
- 6.5.4 The sea views would also be impacted by the marine structures, including the MOLF and breakwater. Views of the sea from the skimmer wall would therefore be limited.

**Figure 6-1 Photomontage image of the Power Station**



- 6.5.5 Having crossed the skimmer wall the seaward route would head inland and would pass between the both Existing Power Station and the Power Station. At this point, walkers would be between two substantial security fences, before re-joining the existing route of the WCP.

For the reasons stated above, it is Horizon's opinion that these award route would be less desirable to walkers than the proposed route and was therefore dismissed as part of the optioneering process.

## 7 Figures

**Figure 7-1 Existing and Proposed Wales Coast Path during Operation**

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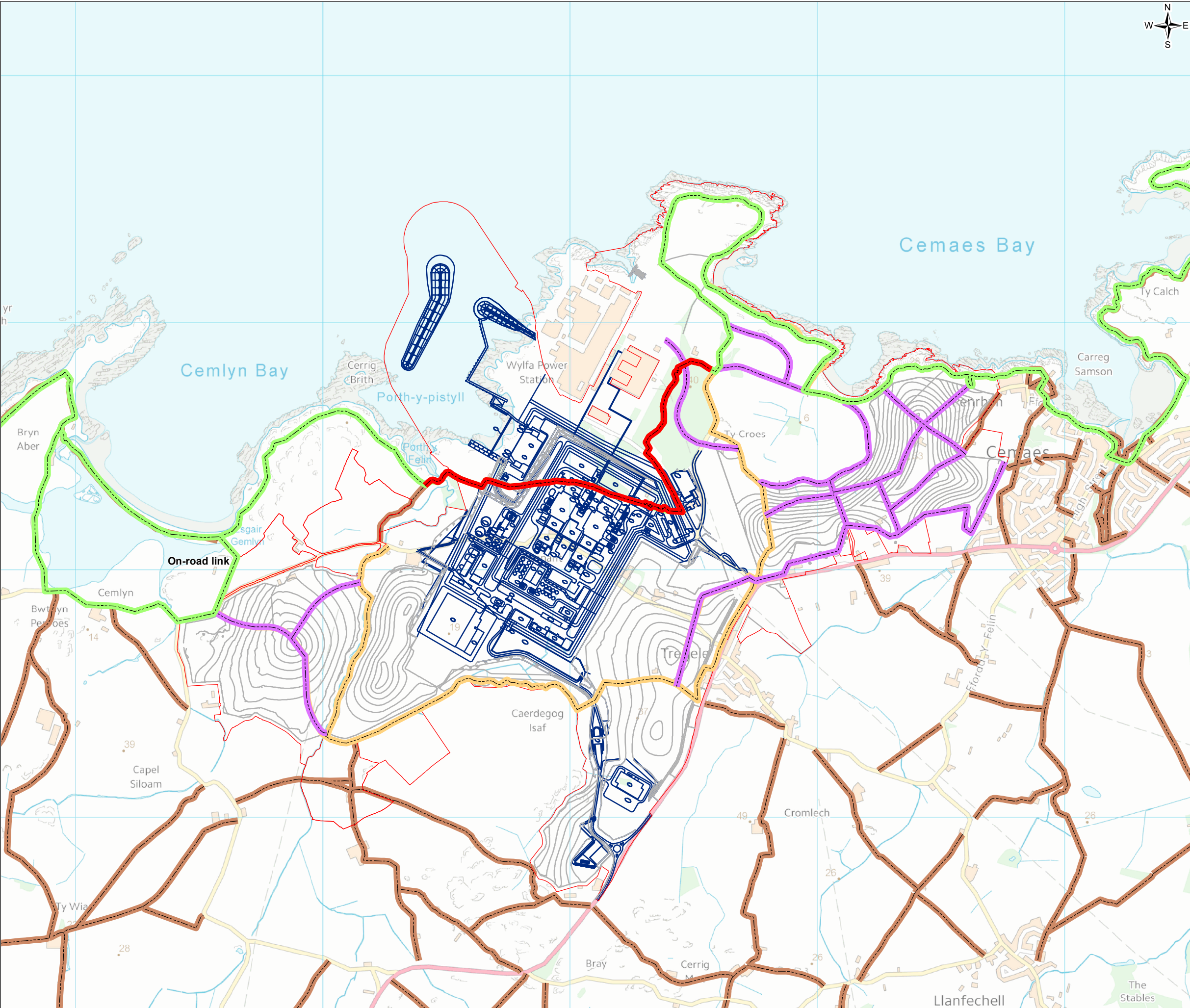
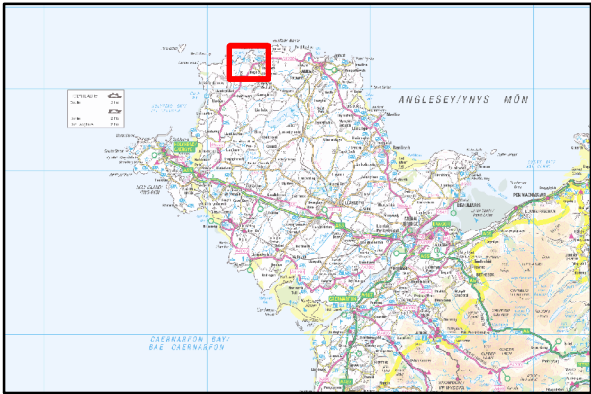


FIGURE 1

- Legend
- Order Limits
  - Power Station
  - Landform Contours
  - Existing Wales Coast Path to be retained
  - Wales Coast Path to be closed
  - Proposed Diversion
  - Wider PRoW Network
  - Proposed PRoW



1.0	DEC 18	DCO submission	HNPWL	HNPWL	HNPWL	HNPWL
Rev.	Date	Purpose of revision	Drawn	Check'd	Rev'd	Appr'd
Client						
<div><div><div>HORIZON</div><div>NUCLEAR POWER</div></div></div>						
Project						
WYLFA NEWYDD PROJECT ENVIRONMENTAL STATEMENT						
Drawing Title						
WALES COAST PATH DIVERSION PROPOSED PERMANENT OPERATIONAL DIVERSION						
Scale @ A3	1:15,000				DO NOT SCALE	
Jacobs No.	60PO80AG					
Client No.						
Drawing No.						
60PO80AG_DCO_WCPD_01						
This drawing is not to be used in whole or in part other than for the intended purpose and project as defined on this drawing. Refer to the contract for full terms and conditions.						



**Figure 7-2 Locations where the Wales Coast Path diverts from the coast**



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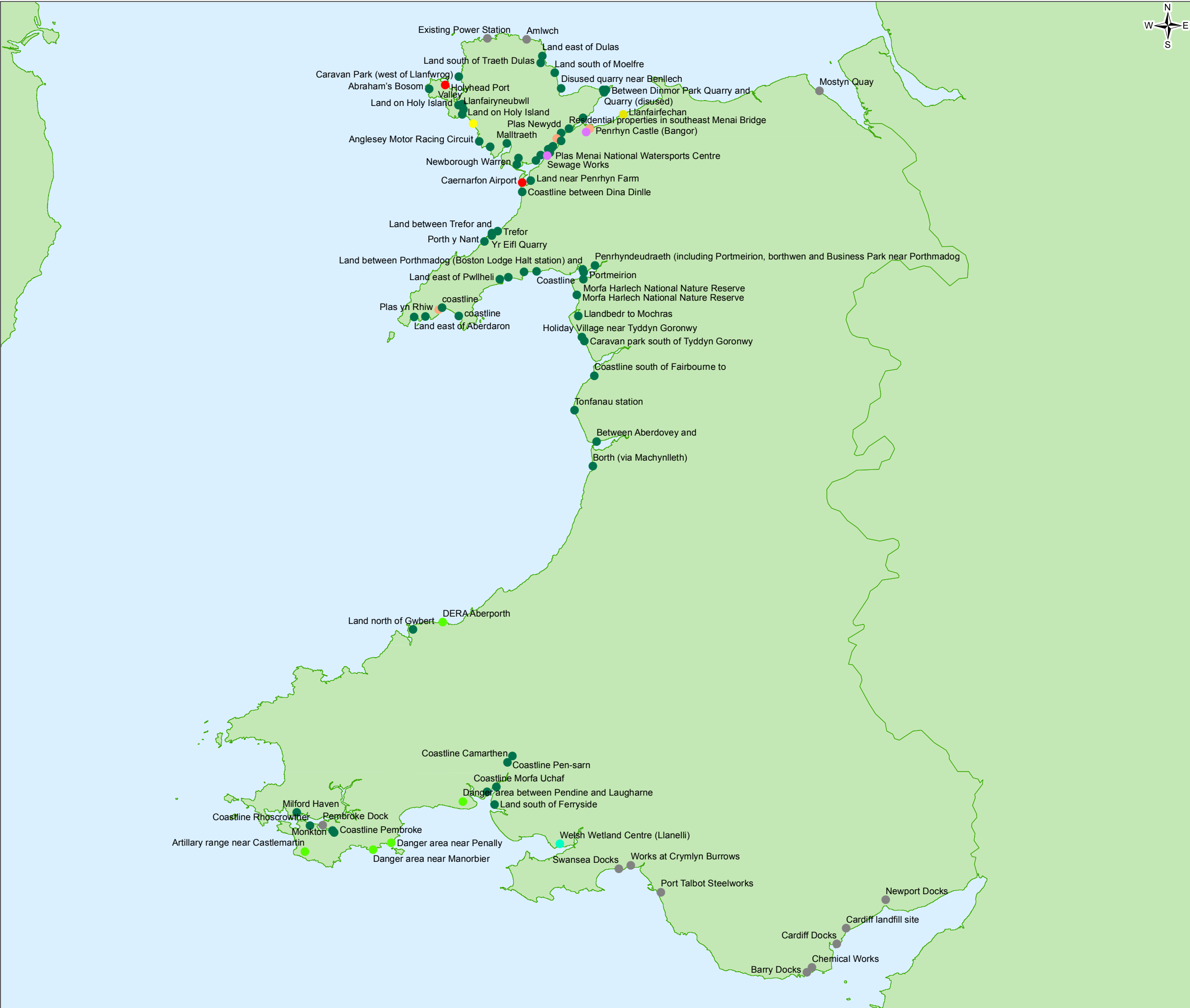
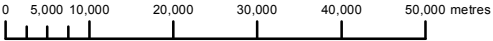


FIGURE 2

Legend

- Industrial
- Industry
- Infrastructure
- Military
- National Trust
- Residential
- Transportation
- Wildfowl and Wetland Trust
- Other

1.0	DEC 18	DCO submission	HNPWL	HNPWL	HNPWL	HNPWL
Rev.	Date	Purpose of revision	Drawn	Check'd	Rev'd	Appr'd
Client			<div><div>HORIZON</div><div>NUCLEAR POWER</div></div>			
Project			WYLFA NEWYDD PROJECT ENVIRONMENTAL STATEMENT			
Drawing Title			LOCATIONS WHERE WALES COAST PATH IS ROUTED INLAND			
Scale @ A3	1:900,000			DO NOT SCALE		
Jacobs No.	60PO80AG					
Client No.						
Drawing No.	60PO80AG_DCO_WCPD_00					
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## Appendix 1 Inland sections of the Wales Coast Path

**Table A-1 Locations where the WCP is routed inland**

Location	Description	Approximate grid reference (centre point)	Notes
Mostyn Quay	Industrial	SJ 157 811	WCP is routed inland of Mostyn Docks for a length of approximately 1.2km, following the route of the A458. Slightly further west the WCP is routed inland again at Ffynnongroyw via a residential road due to residential properties, a dual carriageway and railway adjacent to the coast.
Llanfairfechan	Residential and infrastructure	SH 682 753	WCP routed inland for a length of approximately 1.8km passing south of residential housing, a dual carriageway and a railway.
Penrhyn Castle (Bangor)	National Trust	SH 600 720	Significant inland diversion (approximately 6.5km in length) around Penrhyn Castle and Garden (National Trust property), Llandygai Industrial Estate and Porth Penrhyn Harbour. Approximately half the diversion route follows a minor road, with a small portion of the route utilising the A5.
Industrial estate (Bangor)	Industrial	SH 591 711	
Between Pont Britannia and Beaumaris	Other	SH 584 745	The WCP is routed along a minor road (Lon Ganol) for a distance of approximately 4.5km between the Pont Britannia and Beaumaris, inland of the A545
Plas Newydd (National Trust)	Other	SH 515 695	Substantial inland diversion around National Trust property and surrounding private properties and lands.
Quarry (disused)	Other	SH 635 807	WCP routed inland for a distance of approximately 1.5km following a minor road.

Location	Description	Approximate grid reference (centre point)	Notes
Dinmor Park Limestone Quarries (disused) and smaller former quarry sites along the coastline between Trwyn Du and Pentrellwyn	Other	SH 604 811	Significant diversion inland of former quarry workings, in excess of 7km in length.
Disused quarry near Benllech	Other	SH 531 818	Minor diversion of approximately 0.8km inland of former quarry workings, now utilised as a leisure and holiday park.
Land south of Moelfre	Other	SH 515 855	Minor diversion of approximately 0.7km through agricultural fields.
Land south of Traeth Dulas	Other	SH 481 879	WCP routed away from the coast through agricultural fields for a distance of approximately 2.9km.
Land east of Dulas	Other	SH 485 896	Route follows minor roads inland of the village of Dulas and Lllys Dulas.
Amlwch	Industrial	SH 447 935	Route diverted inland around port via footpaths and local roads.
Existing Power Station	Industrial	SH 352 938	Route diverted inland of the Magnox Power Station via the Magnox nature trail and access road. Total length of diversion approximately 2.2km.
Caravan Park (west of Llanfwrog)	Other	SH 282 846	Route diverted inland of Penrhyn Bay Caravan Park for a distance of approximately 1.1km.
Holyhead Port	Industrial transportation /	SH 249 825	Minor diversion inland of Holyhead Inner Harbour structures and the harbour breakwater.

Location	Description	Approximate grid reference (centre point)	Notes
Abraham's Bosom	Other	SH 211 816	Route follows minor road for a distance of approximately 1km inland of the residential properties named Plas Nicol and Ty'n-nant.
Land on Holy Island	Other	SH 290 754 to SH 281 776	Substantial inland diversion between Traeth Llydan and Rhyd-y-Bont.
Valley	Other	SH 291 780	Minor inland diversion inland of commercial premises.
Llanfairyneubwll	Residential	SH 294 766	Minor diversion inland of residential properties
Rhosneigr	Residential	SH 317 732	Route follows A4080 and minor road inland of residential properties at Rhosneigr.
Anglesey Motor Racing Circuit	Other	SH 331 688	Route diverted inland of Anglesey Motor Racing Circuit via local roads.
Between Tywyn Aberffraw and Malltraeth	Other	SH 383 691	Significant inland diversion. Route utilises A4080 between Llangadwaladr and Aberhoccwn.
Newborough Warren	Other	SH 423 632	Significant inland diversion around Newborough Warren National Nature Reserve (NNR)/
Between Pen Lôn and land southwest of Foel Farm	Other	SH 453 646	WCP follows inland route between Pen-lôn and Gelliniog Goch, partially utilising minor roads.
Coastline south of Llanidan	Other	SH 489 666	Route follows field boundaries inland for a distance of approximately 1.6 km as it follows the coast south of Llanidan.
Coastline south of Llanedwen	Other	SH 511 677	Route follows minor roads for a distance of approximately 1.3 km.

Location	Description	Approximate grid reference (centre point)	Notes
Coastline south of Llanfair Pwllgwyngyll, including Plas Newydd National Trust property	Other/National Trust	SH 507 700	Significant diversion, largely utilising a minor road with a portion of the route routed alongside the A4080.
Residential properties in southeast Menai Bridge	Residential	SH 550 720	Minor diversion along the A4080 landward of several residential properties on the southeastern outskirts of Menai Bridge.
Vaynol Park	Other	SH 531 690	Substantial inland diversion around Vaynol Park using a route utilising the A487 and B4547 for a significant proportion of the route.
Plas Menai National Watersports Centre	Other	SH 503 660	Substantial diversion utilising minor and local roads, landwards of Plas Menai National Watersports Centre and a sewage treatment works.
Sewage treatment works	Industrial	SH 497 654	
Land near Penrhyn Farm	Other	SH 457 593	Minor diversion inland around lands surrounding Penrhyn Farm via minor and local roads.
Caernarfon Airport	Transportation	SH 436 589	Minor diversion landwards of Caernarfon Airport.
Coastline between Dinas Dinlle and Trefor	Other	SH 417 501	Substantial inland diversion, largely adjacent to the A449.
Land between Trefor and Porth y Nant, including Yr Eifl Quarry	Other	SH 362 460	Substantial diversion inland of Yr Eifl Quarry and other former quarry works around the coast
Land between Penrhyn Bodeilias and Nefyn	Other	SH 314 407	WCP diverted inland for short period around holiday park and residential estate.
Land east of Aberdaron	Other	SH 192 268	Relatively minor inland diversion via minor road.

Location	Description	Approximate grid reference (centre point)	Notes
Plas yn Rhiw	Other	SH 234 280	Relatively minor inland diversion around National Trust lands.
Coastline	Other	Between SH 241 285 and SH 282 264	WCP routed inland through agricultural fields for a significant distance between Treheli and Llanegan.
Land east of Pwllheli	Other	SH 395 363	Minor inland diversion, partially routed along A497.
Coastline	Other	Between SH 441 371 and SH 471 373	Substantial inland diversion, largely adjacent to A497.
Portmeirion	Other	SH 585 371	Substantial inland diversion landwards of Port Meirion. Several sections of the route adjacent to A497.
Land between Porthmadog (Boston Lodge Halt station) and Penrhyndeudraeth (including Portmeirion, Borthwen and Business Park near Porthmadog)	Other	SH 583 378 and SH 613 388	
Morfa Harlech National Nature Reserve (NNR)	Nature Reserve	Between SH 585 354 and SH 569 315	Substantial inland diversion west of NNR, settlement of Lower Harlech and a recycling centre.
Llandbedr to Mochras	Other	SH 573 265	Route diverts inland at several locations around a residential property and the settlement of Mochras.
Holiday village near Tyddyn Goronwy	Other	SH 581 214	Substantial inland diversion adjacent to the A496 for a significant proportion of the route.
Caravan park south of Tyddyn Goronwy	Other	SH 587 203	

Location	Description	Approximate grid reference (centre point)	Notes
Coastline south of Fairborne to Tonfanau station	Other	SH 611 120 to SH 564 035	Substantial inland diversion landwards of several settlements, former quarry workings, railway and an A road.
Between Aberdovey and Borth (routed via Machynlleth)	Other	SN 617 960 and SN 608 900	This section of the WCP is largely routed inland, representing a substantial diversion from the coast.
DERA Aberporth	Military	SN 243 521	Minor inland diversion utilising minor roads and footpaths.
Land north of Gwbert	Other	SN 171 504	Minor diversion landwards of Ceredigion Coastal Farm Park.
Milford Haven	Industrial	SM 899 060	WCP routed through built up area landwards of Milford Haven Port and Marina.
Pembroke Dock	Industrial	SM 952 029	Significant diversion through built up area landwards of dockyards.
Monkton	Residential	SM 976 016	Minor inland diversion south of settlement of Monkton.
Coastline between Pembroke and Rhoscrowther	Other	SM 980 012 to SM 921 028	This section of the WCP is routed inland at several locations around residential properties, a former quarry and Pembroke Power Station
Artillery range near Castlemartin	Military	SR 908 965	Significant inland diversion largely adjacent to the B4319
Danger area near Manorbeir	Military	SS 074 969	Very minor inland diversion via footpaths and local roads.
Danger area near Penally	Military	SS 118 985	Very minor inland diversion



Location	Description	Approximate grid reference (centre point)	Notes
Danger area between Pendine and Laugharne	Military	SN 292 086	Substantial inland diversion, adjacent to the A4066 for the majority of the route.
Coastline between Llansteffan and Carmarthen	Other	SN 351 110 to SN 401 182	Substantial inland diversion, largely utilising minor roads and local roads.
Coastline between Pen-sarn and Morfa Uchaf	Other	SN 413 197 to SN 374 122	Substantial inland diversion, largely utilising minor roads and local roads.
Land south of Ferryside	Other	SN 369 079	Substantial diversion landwards of several residential properties and Carmarthen Bay Holiday Centre
Danger area at Pembrey	Military	SN 385 030	Minor inland diversion in Pembrey Forest area.
Millennium Coastal Park	Nature Reserve (Wildfowl and Wetland Trust)	SS 528 983	Minor inland diversion landwards of the Millennium Coastal Park.
Swansea Docks	Industrial	SS 671 923	Substantial diversion landwards of Swansea Docks, an industrial park and Swansea University Bay Campus.
Works at Crymlyn Burrows	Industrial	SS 700 931	
Port Talbot Steelworks	Industrial	SS 773 866	Substantial diversion through a built up area landwards of Port Talbot Steel Works and Margan Moors
Sewage works at Merthyr Mawr	Industrial	SS 875 767	Minor diversion landwards of sewage works.
Barry Docks	Industrial	ST 127 671	Substantial inland diversion through build up area adjacent to A4055 and minor roads.
Chemical Works	Industrial	ST 139 683	
Cardiff Docks	Industrial	ST 200 740	Significant inland diversion through built up area.

Location	Description	Approximate grid reference (centre point)	Notes
Lamby Way (Cardiff)	Landfill site	ST 222 778	Minor inland diversion adjacent to minor road.
Newport Docks	Industrial	ST 319 847	Significant inland diversion through built up area.

### ***Example 1: Port Talbot Steelworks***

The WCP is routed inland of Port Talbot Steelworks and Margan Moors at Port Talbot on the south Wales coast (see Figure A-1). It follows the Aberavon Beach Promenade west of Baglan Bay before heading inland along a minor road adjacent to the River Afan adjacent to the A48. It follows the A48 for around 2km before heading along a minor road through a residential area of Margam. The route then follows adjacent to the A48 for a short period before heading coastwards at junction 38 of the M4, along a minor road and over a railway track before joining the coastline at the far eastern extents of Kenfig Dunes adjacent to the Afon Cynffig. The total length of the WCP routed inland at this location is over 6km, which equates to around 1 hour and 12 minutes of walking time (in accordance with Table B4-15 of chapter B4 [APP-069]).



**Figure A-1 Route of the WCP (indicated by green diamonds) at Port Talbot and Margam Moors (Crown Copyright 2019)**

***Example 2: Penrhyn Castle and Llandygai Industrial Estate, Bangor***

The WCP is routed inland of Penrhyn Castle, a National Trust property, at Bangor (see figure A-2). The route follows a minor road between the property named Glan-y-môr-isaf as far as Talybont, before heading through agricultural fields and back onto minor and local roads through Llandygai. It then heads seawards following the Afon Cegin to reach the coast immediately east of Porth Penrhyn. The total length of the WCP routed inland at this location is over 6km, which equates to around 1 hour and 12 minutes of walking time (in accordance with Table B4-15 of chapter B4 [APP-069]).





**Figure A-2 Route of the WCP (indicated by red diamonds) at Penrhyn Castle  
(Crown Copyright 2019)**

### ***Example 3: Pembroke Docks***

From Cleddau Bridge, the WCP heads inland along the A447 for a short while before heading east through the settlement of Llanion via minor roads and then onto the A4139 and B4322 around Pembroke Dockyard (see Figure A-3). From a viewpoint at Barrack Hill it then heads back through the outskirts of Llanion and Pennar before rejoining the coastline on the outskirts of Pennar. The total length of WCP routed inland at this location is approximately 7km, equating to a walking time of approximately 1 hour and 24 minutes of leisure walking time (in accordance with Table B4-15 of chapter B4 [APP-069]).





**Figure A-3** Route of the WCP (indicated by green diamonds) at Pembroke Docks (Crown Copyright 2019)





## Wylfa Newydd Project

### Horizon's Written Response to Oral Hearing comments made by Land and Lakes

PINS Reference Number: EN010007

17 January 2019

Revision 1.0

Examination Deadline 4

Planning Act 2008

Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

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# **1 Response to Land and Lakes**

## **1.1 Overview**

- 1.1.1 The report "Traffic and Transport Matters" [REP2-248] dated 4 December 2018 was submitted by Land and Lakes Ltd at Deadline 3 (18 December 2018). This report was prepared by Curtins transport consultants on behalf of Land and Lakes Ltd.
- 1.1.2 This document provides comments on the transport analysis provided in the Curtins' report [REP2-248].

## **1.2 Requirement for Commuter Buses**

- 1.2.1 The Curtins' report [REP2-248] contains analysis of the potential transport impact of providing residential accommodation for 3,500 construction workers for the Wylfa Newydd DCO Project at the sites proposed by Land and Lakes on Holy Island. This proposal is not part of the Wylfa Newydd DCO Project.
- 1.2.2 In contrast, the Wylfa Newydd DCO Project proposes to provide residential accommodation (the Site Campus) for 4,000 construction workers at the Wylfa Newydd Development Area (WNDA).
- 1.2.3 Transport analysis provided in the Curtins report at paragraph 1.5.6 states that a total of 21 coaches would be required to move the construction workers each day from the Land and Lakes sites on Holy Island to the WNDA.
- 1.2.4 It is then assumed that each bus would have 45 seats per bus and hence these 21 coaches would enable 945 workers to be transferred each day to the WNDA.
- 1.2.5 It is not clear how the remaining 2,555 workers proposed to be resident at the Land and Lakes sites on Holy Island would travel each day to the WNDA.
- 1.2.6 This means that the rest of the analysis provided in the Curtins report is considered to be inaccurate and flawed.
- 1.2.7 A more appropriate analysis would be to state that if 3,500 workers were to be resident at the Land and Lakes sites on Holy Island then 70% of these workers would be expected to work on the day shift. This is equivalent to 2,450 workers.
- 1.2.8 If a bus or coach carries 45 people then this means that 54 buses would be required to transport all the workers from Holy Island to the WNDA every day at the start of the day shift and 54 buses would be needed again at the end of the day shift.
- 1.2.9 This is more than double the number of buses assumed to be required according to the Curtins analysis.
- 1.2.10 In contrast, the Wylfa Newydd DCO Project proposes to enable up to 4,000 construction workers to live at the Site Campus at the WNDA. These

workers would be able to walk (or use an internal bus service) to reach specific work sites around the WNDA.

- 1.2.11 These daily trips would therefore have no impact on the surrounding transport networks.
- 1.2.12 In summary, the Land and Lakes proposal would require 2,450 construction workers on the day shift to travel each day to and from the WNDA in a minimum of 108 bus movements during the day (54 to the WNDA and 54 from the WNDA), plus additional bus movements to transport the night shift workers. The Site Campus proposals in Wylfa Newydd DCO Project remove all these trips from the road network helping to reduce the traffic impact of the Wylfa Newydd DCO Project.

### **1.3 Derivation of Car Parking Numbers**

- 1.3.1 The Curtins' report [REP2-278] states at paragraph 2.2.27 that no breakdown or rationale for the derivation of car parking numbers is provided in the DCO application.
- 1.3.2 This is incorrect and a derivation of car parking numbers for the Wylfa Newydd DCO Project is provided in section 7.3 and section 7.4 of the DCO Transport Assessment [APP-101].
- 1.3.3 A summary of the proposed parking provision is presented in Table 7-4 of the DCO Transport Assessment [APP-101].

### **1.4 On-site Facilities**

- 1.4.1 The Curtin's report [REP2-278] states in section 2.2 that a lack of on-site facilities and nearby amenities for the Site Campus proposed as part of the Wylfa Newydd DCO Project means that construction workers are more likely to travel off-site and this would increase traffic impacts.
- 1.4.2 In fact, a wide range of facilities are to be provided at the Site Campus to reduce the need to travel off-site. The facilities are further described in Design and Access Statement DAS Vol 3 Appendix 1-2 Site Campus [REP2-029].
- 1.4.3 Any trips made by construction workers away from the Site Campus would be during periods of non-working and so these trips would tend to be outside periods of peak travel on the surrounding road network and hence they would occur when background traffic flows are lower.

## **1.5 Weekend Travel**

- 1.5.1 The Curtins' Report [REP2-278] states at paragraph 2.3.1 that no assessment has been made of weekend travel by construction workers as part of the application for the Wylfa Newydd DCO Project.
- 1.5.2 This analysis has been made and is provided in section 7.4 of the DCO Transport Assessment [APP-101].
- 1.5.3 The analysis and conclusions of the transport analysis provided in the application documents for the Wylfa Newydd DCO Project therefore fully considers the impact of weekend travel i.e. the travel associated by those non-home-based construction workers who choose to return to their permanent home when not working.
- 1.5.4 It should be noted that those construction workers leaving the Site Campus for the Wylfa Newydd DCO Project by car would be able to use the new A5025 Off-line Highway Improvements to reach the A55. The delivery of the A5025 Off-line Highway Improvements therefore helps reduce the potential traffic impacts of weekend travel by construction workers on residents who live near the existing alignment of the A5025.
- 1.5.5 If the Temporary Workers Accommodation (TWA) was located at Land and Lakes, this would generate the same number of weekend trips as the TWA being located at the WNDA.

## **1.6 Potential for “rat-running”**

- 1.6.1 Section 2.4 of the Curtins' report [REP2-278] presents concerns about potential “rat-running”. This issue has been raised by other stakeholders and it has been addressed as part of the Wylfa Newydd DCO Project through restrictions provided in the updated Wylfa Newydd Code of Construction Practice submitted at Deadline 2 (4 December 2018) [APP-414]. Section 5 states that construction workers should use ‘A’ roads wherever practicable when travel to and from the Wylfa Newydd DCO Project.

## **1.7 Travel Time to Site**

- 1.7.1 Section 2.5 of the Curtins' report [REP2-278] provides comments on the expected daily commuting times to the Wylfa Newydd DCO Project. These comments apply to daily car commuters and hence they are not related to the potential provision of worker accommodation on Holy Island or at the WNDA as these workers would either travel by coach or walk to work.
- 1.7.2 Issues concerning working hours and commuting times are addressed in Horizon's response to post hearing documents including any written submission of oral case (page 15-18) [REP2-006].

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