

From: [REDACTED]
To: Wylfa@pins.gsi.gov.uk; Jake.Stephens@pins.gsi.gov.uk
Subject: Deadline 7 submissions NACP
Date: 14 March 2019 09:12:37
Attachments: [ISH submission March 2019.pdf](#)
[Copper Trail diversion Q2..pdf](#)
[Local Labour Workforce.pdf](#)

Bore da Jake,

Dyma mewnbwn diweddaraf y bartneriaeth ar gyfer 'Deadline 7'. Oes amserlen ar gyfer cyhoeddi yr 'audio' o wrandawiadau wythnos diwethaf? Dwi angen gwirio y drafodaeth o ddydd lau gan nad oeddwn yn gallu bod yn bresennol.

Cofion,
Dafydd

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Post Hearing Note following the Open Floor hearing 5th March 2019

Deadline 7 submission

Dafydd Griffiths on behalf of the NACP

Introduction

The North Anglesey Council's Partnership (NACP) consists of representatives from the following six Community and Town Councils:

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Llaneilian Community Council

Mechell Community Council

Rhosybol Community Council

The views expressed in this document are those of the NACP.

Update on engagement between the applicant and the NACP

A representative of the North Anglesey Councils' Partnership (NACP) spoke at the Issue Specific Hearing on 8th January 2019 to highlight the NACP's concerns about the impact of both the A5025 improvements between Valley and Cemaes, and the re-routing of the Lôn Las Copr / Copper Trail on Non-motorised Users (NMU). As agreed with the applicant, the NACP submitted details, including sketches at the request of the Examining Authority, which highlighted specific sections of the A5025 between Valley, the WNDA and Cemaes where the NACP have concerns about the impact on NMU.

NACP's detailed comments were submitted at Deadline 4 (17th January 2019). A meeting to discuss the NACP's concerns about NMU provision has now been scheduled for Friday 15th March 2019 between Horizon, representatives of IACC and the NACP. If appropriate, the NACP will submit a further response on these matters at Deadline 8.

Scope of this submission

This submission is in response to the draft s.106 agreement between Horizon and the IACC submitted at Deadline 6 and is focused on the current proposals for s.106 funding of NMU provision.

The NACP note the latest funding proposals for the creation of new Public Rights of Way (£300K) and PRow maintenance funding (£300K). The NACP are supportive of these proposals.

The NACP also note the Copper Trail (Signage) Provision (£60K) and the Copper Trail (Sustrans) Provision (£10K). The NACP are also aware and support the provision of a joint use path on the northern side of the road between Nanner Road and the WNDA. Issues regarding the detailed routing of the Copper Trail during construction and operation are the subject of a separate submission by the NACP.

NACP's submission at Deadline 7

Concerns have been raised during the pre-application process and during the examination at deadline 2, deadline 4 and deadline 6 that improvements proposed on the A5025 between Valley, the WNDA and Cemaes have not given sufficient weight to the impact on Non-motorised Users (NMU).

At deadline 4 the NACP identified specific sections of the A5025 where the applicant was proposing NMU infrastructure but in the opinion of the NACP the proposals were inadequate. The NACP also identified other specific sections of the A5025 where the applicant currently had no NMU infrastructure proposals but where, in NACP's view, mitigation was needed. At deadline 6, as a follow up to the Accompanied Site Inspection that took place on the 14th February 2019, the NACP submitted further comments and proposals on the most appropriate route for the Lôn Las Copr / Copper Trail during both the construction and operational phases of the Wylfa Newydd Power Station.

Comments on Draft Section 106 agreement (Deadline 6)

The NACP note that the applicant's draft s.106 agreement submitted at deadline 6 now proposes to "fund walking and cycling improvements to routes near or adjacent to the A5025 between Valley and Wylfa". This is one of a list of nine bullet points to be delivered by the IACC from the Transport (Annual) Contribution within Schedule 7 - Transport. For convenience the appropriate section of Schedule 7 is included at the end of this submission as Appendix A.

It is currently proposed that funding of the Transport (Annual) Contribution would be available during the "construction phase" of the Wylfa Newydd Power Station and this is currently estimated to be approximately 8 years.

Whilst the recognition of the need to "fund walking and cycling improvements to routes near or adjacent to the A5025 between Valley and Wylfa" is, in the view of the NACP, belated, the NACP welcomes its inclusion in Schedule 7 – Transport. Throughout the examination process the NACP have consistently expressed concerns that the proposed A5025 improvements between Valley and Cemaes have given little attention to the impact on NMU needing to use this part of Anglesey's highway network. The NACP agree that funding within the Transport Schedule of the s.106, rather than any other schedule, is the most appropriate location for addressing the impact on NMU using the A5025 to make direct journeys between the villages on this section of road. However, whilst welcoming the inclusion of funding of walking and cycling improvements, the NACP have serious concerns about the structure, the phasing and magnitude of the proposed fund as currently outlined in the draft s.106 agreement.

Magnitude of draft s.106

The Transport (Annual) Contribution fund consists of annual payments of £100,000 for the duration of the construction phase. However, no details have been shared of how the magnitude of the fund has been calculated. It is the NACP's view that, given the current level of detail, the fund is very unlikely to be sufficient to implement all the activities identified in the nine bullet points without recourse to the public purse.

Phasing of draft s.106

The proposed annual phasing strategy is also a concern. Some of the bullet points consist of activities that are likely to be required on an on-going basis throughout the construction phase – eg traffic surveys, enforcements and management costs for traffic issues such as fly parking and traffic management measures to help prevent rat- running. However, some of

the bullet points are one off inputs that, to be effective, need to be implemented very early in the construction phase eg improvements to bus stops, works at Valley crossroads and the funding of walking and cycling improvements. It is the NACP's view that the phasing of the mitigation in the current proposals should be modified to bring forward funding for schemes that need early delivery.

Structure of draft s.106

It is for the reasons outlined above that the NACP seek a modification to the structure of the draft s.106 agreement to separately identify a specific funding stream, of an appropriate magnitude and phasing, to be used by the Local Authority to fund walking and cycling provision near of adjacent to the A5025 between Valley and Cemaes. The NACP would respectfully draw the attention of the applicant, the IACC and the examination panel members to Section 6, Walking and Cycling Improvements, within Schedule 11 (Transport) of the s.106 agreement agreed between Somerset County Council and NNB GenCo (Hinkley Point C). For convenience this is included at the end of this submission as Appendix B.

Mitigation of impact on NMU in similar Nationally Significant Infrastructure Projects

In recognition of the impact on NMU of the substantial increase in volume and change in the makeup of traffic, particularly on the main HGV routes, the Hinkley Point C Section 106 agreement identifies an indexed linked fund of up to £3,175,000 specifically for the design and implementation of Walking and Cycling Improvements.

The NACP would also respectfully draw the panel's attention to the 'Effect on Non-motorised Users' section of the Hinkley Point C Examination Authority's recommendation to the Secretary of State (SoS) where it was accepted that "in some locations the junction improvements proposed and the additional traffic that would be generated could have an adverse effect on non-motorised users".

It is the NACP's view that NMU using the A5025 to travel between the villages on the section of road between Valley and Cemaes would experience similar adverse effects and significant funding, similar in magnitude to Hinkley Point C, and secured via a s.106 agreement with the IACC is appropriate. For convenience the appropriate section of the Examination Authority recommendation to SoS is included at the end of this submission as Appendix C.

We look forward to receiving a considered response from the applicant and IACC to the NACP's submission.

Dafydd Griffiths (On behalf of the NACP)

Appendix A

Section 7 Transport

2. Transport (Annual) Contribution

- 2.1 The Transport (Annual) Contribution shall be paid by the Developer to the Council in the following instalments:
 - 2.1.1 the first instalment of £100,000 (One Hundred Thousand Pounds) shall be paid prior to Implementation; 2.1.2 the second and subsequent payments each of £100,000 (One Hundred Thousand Pounds) shall be paid annually on the anniversary

of Implementation thereafter for the duration of the Construction Period, and the Developer shall not Implement the Wylfa Newydd DCO Project until the first payment has been made.

- 2.2 The Council shall use the Transport (Annual) Contribution to:
- 2.2.1 undertake additional traffic surveys (including speed surveys) required in respect of the Wylfa Newydd DCO Project;
- 2.2.2 fund traffic orders required by the Wylfa Newydd DCO Project;
- 2.2.3 fund enforcements and management costs for traffic issues such as fly parking caused by the Wylfa Newydd DCO Project;
- 2.2.4 fund improvement of bus stops on Class A and Class B roads in the vicinity of Wylfa Newydd where necessary to improve them (to) a standard suitable for use as part of the Wylfa Newydd DCO Project;
- 2.2.5 fund traffic management measures on neighbouring roads to help prevent rat-running;
- 2.2.6 fund walking and cycling improvements to routes near or adjacent to the A5025 between Valley and Wylfa (other than those being funded pursuant to Schedule 3);
- 2.2.7 fund urban realm works at Valley Crossroads (including re-setting traffic lights, undertaking road markings);
- 2.2.8 fund additional officer capacity in times of peak demand; and
- 2.2.9 other matters which may be agreed with the Developer from time to time.

Appendix B

6. WALKING AND CYCLING IMPROVEMENTS

- 6.1 NNB GenCo shall pay the sum of £317,500 to the County Council on or before the Commencement Date, such amount to be used for the design of Walking and Cycling Improvements.
- 6.2 Subject to paragraph 6.5, with effect from the Transitional Date NNB GenCo shall within 15 Working Days of receipt by NNB GenCo of a detailed proposal provided to it by the County Council for the implementation of any Walking and Cycling Improvements pay to the County Council the reasonable costs of implementing those Walking and Cycling Improvements.
- 6.3 Any detailed proposal provided by the County Council to NNB GenCo pursuant to paragraph 6.2 shall include a detailed estimate of the costs of implementing the proposed Walking and Cycling Improvements, the scheduled start date for implementation and the estimated date of completion of the Walking and Cycling Improvements and detailed designs of the Walking and Cycling Improvements and in preparing any such proposal the County Council shall consult and take into account the reasonable representations of NNB GenCo and Sedgemoor Council.
- 6.4 The County Council shall apply any amounts received from NNB GenCo pursuant to paragraph 6.2 towards the costs of the County Council carrying out and completing the relevant Walking and Cycling Improvements in accordance with the detailed proposal provided by the County Council in accordance with paragraph 6.2.

- 6.5 The maximum liability of NNB GenCo pursuant to this paragraph 6 is £3,175,000 Index Linked in accordance with clause 12.

Appendix C

Effect on non-motorised users

- 4.68 In their representations many interested parties argue that the road improvements proposed for Bridgwater, and the additional traffic that that would be generated during construction of the proposed power station, would make journeys on foot or by cycle (ie journeys by non-motorised users) in the town more difficult. Others argue that the additional traffic that would be using the rural roads leading to Hinkley Point C (and particularly the C182) would make them more hazardous for cyclists and horse riders.
- 4.69 As to the merits of the points made, we accept that in some locations the junction improvements proposed and the additional traffic that would be generated could have an adverse effect on non-motorised users. We are mindful, however, firstly, that the responsible highway authority (whose remit includes making provision for walkers, cyclists and horse riders as well as motorised vehicles) has raised no formal objection in this respect; and, secondly, that the s106 Agreement provides specifically for the Applicant to pay up to £3,175,000 for 'Walking and Cycling Improvements' (PD112, Schedule 11). Where this money would be spent would be primarily for the highway authority (Somerset County Council) to determine and, as such, we anticipate that it would be used to address the most pressing deficiencies in the current network (including, potentially, existing deficiencies). To our minds, this approach is an appropriate response to the matter. Accordingly, we see no reason for the Secretary of State to regard the effect the development would have on non-motorised users, as a factor that should weigh against the proposal.

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Local Labour Force (During Construction)

Estimated figures for the 'Local Labour Force' became publicly available to the North Anglesey Councils' Partnership (NACP) with the submission of DCO documentation in the summer of 2018. Horizon's current proposals are based on 2000 workers being home based and up to 7000 requiring accommodation locally at peak.

The NACP have expressed concerns to Horizon about the definition of 'Local Labour' but accept that the applicant is using a definition widely used in the construction industry to calculate the Daily Construction Commuting Zone (DCCZ). This estimates that 85% of Home Based Workers will live within a 90 minute each way travel to work zone.

Information in APP-096 and further information received from the applicant estimates that of the 2000 'home based workers':

521 (26%) are estimated to live in North Anglesey

1256 (63%) are estimated to live on Anglesey

1567 (78%) are estimated to live within a 60 minute commute. This would include but be slightly larger than the 'Mainland Menai' area.

The estimated remainder 433 (22%) of the 'Local Workforce' would live beyond a 60 minute daily Travel to work area.

The NACP are also aware of occupational area estimates, again in APP-096, for the potential recruitment from the relatively small area of North Anglesey as follows:

Site Services, Security and Clerical 189

Professional (Managerial) 46

Civil Engineering Operatives 181

Mechanical and Electrical Operatives 54

Operations 51

Estimated potential recruitment data at occupation level for Anglesey is also noted in APP-096 and Horizon have provided NACP with occupation level data for the 60 minute Travel to Work Area. This information is available as Table 1 in this document.

Whilst the NACP welcome the opportunities that would be available to local people by the proposed development we continue to have concerns that the pool of those working or seeking work with the necessary 'nuclear relevant skills' may be relatively small on Anglesey. This is why at Deadline 2 the NACP raised in REP2-341 the importance of training for young people and adults (at 2.1.3) and the potential for serious local labour displacement (at 2.1.5).

The NACP note that the pool of individuals with 'nuclear relevant skills' in employment or seeking work is helpfully compared, occupation by occupation, with the 2000 home based workers that need to be recruited at DCCZ (the 90 minute travel to work area) level but there is no comparison for the smaller geographical areas where the majority of the recruitment is envisaged. The NACP are of the view that as the population of Anglesey represents only approximately 18.5% of the DCCZ, but is estimated by the applicant to be capable of providing 63% of the local workforce, the data for the smaller geographical areas should be made available for examination. Indeed, APP-096 indicates that data for smaller geographical areas is available.

The 'Home Based Gravity Model' that the applicant references uses occupation data from the 2011 Census. The applicant notes at 3.2.21 in APP-096 that:

"For each ward, the population for each of the above 'occupation' types has been identified separately. Thus, five separate home-based gravity models have been produced to represent each of the occupational groupings associated with the construction workforce."

In September 2018, December 2018, just prior to the March 2019 Issue Specific Hearings and in discussions during the March ISH week the NACP requested and received confirmation that Horizon would seek to make the information available. However, as yet, nothing has been received to enable the NACP to test the applicant's estimated recruitment data. Table 2 indicates the data that has been published and the information that the NACP continues to seek.

The NACP remain concerned that the potential recruitment estimates for local workers may be over-optimistic. Currently, it is the NACP's view that this may impact accommodation requirements, may impact traffic calculations, may result in significant local displacement, may require substantial further investment in the area of training and/or retraining and may require a redoubling of efforts to contact suitably skilled workers who may have left the area to seek work.

Dafydd Griffiths

On behalf of the NACP

Table 1						
	Site Services Security and Clerical	Professional (Managerial)	Civil Engineering Operatives	Mechanical and Electrical Operatives	Operations	Total
North Anglesey	189	46	181	54	51	521
Anglesey	467	131	417	123	118	1256
0 – 60 min	586	170	513	153	146	1567

Total (Local)	689	237	675	208	191	2000
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Table 2							
		Site Services Security and Clerical	Professional (Managerial)	Civil Engineering Operatives	Mechanical and Electrical Operatives	Operations	Total
North Anglesey	Workers						
North Anglesey	Claimants						
Anglesey	Workers						
Anglesey	Claimants						
0 – 60 min	Workers						
0 – 60 min	Claimants						
DCCZ	Workers	31,520	10,795	16,744	2,725	N/A	61,784
DCCZ	Claimants	2,210	25	345	10	N/A	2,590

Post Hearing Response – Deadline 7
Route of the Lôn Las Copr / Copper Trail
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NACP's detailed comments were submitted at Deadline 4 (17th January 2019). A meeting to discuss the NACP's concerns about NMU provision has now been scheduled for Friday 15th March 2019 between Horizon, representatives of IACC and the NACP. If appropriate, the NACP will submit a further response on these matters at Deadline 8.

Lôn Las Copr / Copper Trail

The NACP wish to make the following specific comments about the proposed Lôn Las Copr / Copper Trail route in response to Examination question Q2.14.8, the applicant's deadline 5 submission and the proposed s.106 funding.

Q2.14.8

Could/should the Trywydd Copr/Copper Trail revert back to its original route (ie away from the A5025) after the construction period?

Horizon's deadline 5 submission

"The Trywydd Copr / Copper Trail (NCN Route 566) between Cemlyn Bay and Llanfechell is currently routed along Cemlyn Road via Tregele, a route that includes 20-30m of the A5025. Cemlyn Road will be permanently closed as a result of the Wylfa Newydd DCO Project as the footprint of the Power Station will be on top of it.

On this basis, it would not be possible to re-open Cemlyn Road, and the Trywydd Copr / Copper Trail could not revert to its original route.

As set out in the Environmental Statement at Chapter D2 – Alternatives and design evolution [APP-121], Horizon considered two options for the Trywydd Copr / Copper Trail diversion,

one option continued to route cyclists via Tregele, the second involved a shorter section along the A5025 but went direct to Llanfechell.

The preferred option is considered to be the best diversion in the circumstances as it involves the shortest length of route along the A5025 and is comparable in length to the original route. In order to avoid confusion for cyclists it was also considered preferable to only have a single diversion applicable during both construction and operation.”

The NACP post hearing note at Deadline 7

The NACP are of the view that the Lôn Las Copr / Copper Trail could and should be routed as close to its original route as is possible and desirable during both the construction and operational phases of the Wylfa Newydd project.

The Copper Trail is essentially a 36 mile circuitous, circular recreational route in the North East of Anglesey. The route passes near to a number of places of interest – Melin Llynnon, Bae Cemlyn, Eglwys Llanelian etc. It also passes through the town of Amlwch and through or very close to a number of villages - Penysarn, Llanerchymedd, Llanddeusant, Llanrhyddlad, Rhydwyn, Llanfairynghornwy, Tregele, Cemaes and Llanfechell. The route generates economic benefit through spending in shops in some of the villages on route and to accommodation providers in the area.

The NACP note and welcome the specific provision of a ‘Copper Trail (Signage) Contribution and a Copper Trail (Sustrans) Contribution of £65K and £10K respectively within Schedule 3 Tourism and Public Rights of Way in the Deadline 6 s.106 agreement.

In responding to Q2.14.8 in the second round of questions, the applicant references the Environmental Statement Chapter D2 – Alternatives and design evolution [APP-121] (Horizon reference 6.4.2). For convenience the appropriate section is quoted below.

“Copper Trail

2.3.84 The Copper Trail (National Cycle Network Route 566) is currently routed along Cemlyn Road, which would be permanently closed to enable construction of the Power Station. It would therefore be necessary to divert the Copper Trail to avoid Cemlyn Road. Horizon has consulted with the IACC’s cycling officer and Sustrans regarding the need for a diversion, and the use of Nanner Road between Cemlyn Bay and the A5025 is considered to be the most appropriate diversion route. The existing Copper Trail is routed via Tregele before heading south-east to Llanfechell and the diversion would necessarily link up with this existing route at some point.

2.3.85 The two short-listed options considered for the diversion of the Copper Trail were:

- a route along Nanner Road, then north along the A5025 for a distance of 2.2km to Tregele to join its existing alignment; and*
- a route along Nanner Road, then north along the A5025 for a distance of approximately 550m before taking a minor road to the east to link to Llanfechell (avoiding Tregele).*

2.3.86 No preference was given by Sustrans or the IACC, though concerns regarding the routing of the cycle path along the A5025 were raised. Both of these options were presented to the public during public information events that took place in July 2015, which were primarily held to obtain feedback on the A5025 Highway Improvements in the communities most affected by that element of the Wylfa Newydd Project. Feedback obtained during these events did not reach a clear preference for either route. On this basis, Horizon took the decision to pursue the option that involves the shortest section of A5025. Having considered the feedback regarding the change between cycling on minor roads and on the A5025, a segregated cycle path is proposed along this section of main road; this would be delivered as part of the A5025 On-line Highway Improvements.”

The NACP note that two short listed options were proposed for consultation. The NACP recognise that during the construction phase the choice of route is limited. However, during operation of the Power Station the NACP are of the view that another option would be more appropriate. The NACP will return to this option later.

The NACP note that concerns were expressed by IACC and Sustrans about routing along the A5025. However, it is not clear if this concern was due to routing within the carriageway or on a shared use path alongside the carriageway. Feedback from the public during the July 2015 Highway Improvement events did not express a clear preference for one route over the other.

During the Accompanied Site Inspection visit to the area the applicant's representative confirmed that an alongside the carriageway 3M wide shared use path was proposed to link the resurfaced layby at Bwlch to the new Wylfa Newydd roundabout. The applicant's representatives also confirmed that only a footpath¹ is currently proposed between the new Wylfa Newydd roundabout, Tregele and the Magnox Nuclear Power Station entrance. The NACP continue to be of the view that this section of footpath should be suitably surfaced and designated as a shared use path. It is the NACP's view that a continuous shared use path from Nanner Road to the Magnox Nuclear Power Station junction needs to be in place prior to the closure of Cemlyn Road and that this needs to be secured within the DCO.

During the construction phase the NACP do not consider the option selected to be the best diversion in the circumstances and do not agree with the applicant's justification. Whilst the current proposal does involve the shortest riding distance alongside the A5025 it does not encourage stops at Tregele or visits to Cemaes as they will no longer be on, or as close to, the route. This is a major drawback of the option selected by the applicant. Concerns have been noted previously, at deadline 2, deadline 4 and during the Accompanied Site Inspection visit, about the sight lines, the speed and make up of traffic at the proposed crossing at the Bwlch junction particularly for cyclists following the route in a clockwise direction.

Unfortunately, a few days after the Accompanied Site Inspection a car accident occurred at this junction that required the attendance of the North Wales Air Ambulance.

On balance, the NACP view is that the other shortlisted option is more appropriate and safer. Cyclists could use the agreed shared use path from Nanner Road to the Wylfa Newydd roundabout. Crossing at the roundabout would be a lane at a time and the vehicles would be moving much slower than at the Bwlch crossing. Only traffic entering or leaving the WNDA would have to be considered by NMU. From the WNDA roundabout to Tregele upgrading the proposed footpath to a surfaced shared use path would give access to the current A5025 crossing point at Tregele. The NACP are not unduly concerned about the small increase in length of the route via Tregele. The Copper Trail is a circuitous route.

The NACP do not agree with the applicant's assertion that *"in order to avoid confusion for cyclists it was also considered preferable to only have a single diversion applicable during both construction and operation"*. The construction phase is estimated at around 10 years, operation at least 60 years and decommissioning will continue well into the next century. With these timescales the route selected should be the one that will encourage cycling for both recreation and Active Travel and the applicant has a role to play in this.

Finally, the NACP are of the view that following the 10 year construction phase the appropriate route for the Copper Trail from Cemlyn Bay to Tregele during operation, decommissioning and beyond would be a suitably surfaced, off road, shared use path that shares, where possible, the line of the proposed inland route of the Wales Coast Path through the Wylfa Newydd Development Area. Examples of off road shared use paths on Anglesey and the mainland that operate successfully with little or no conflict between NMU are the cob at Malltraeth, parts of Lôn Cefni, Lôn Eifion and Lôn Las Ogwen.

¹This footpath is also the route of the proposed inland diversion of the Wales Coast Path.

For the avoidance of doubt:

Within the carriageway – Cyclists sharing the main carriageway with motor vehicles

Alongside the carriageway – Cyclists using a path alongside the road but separated from motor vehicles. (This might be a shared use path for use by pedestrians and cyclists.)

Off road - Cyclists using a path away from the road. (A surfaced path shared with other NMU.)

Dafydd Griffiths (On behalf of the NACP)