

Deadline 6 response
Examination question Q2.14.8
Dafydd Griffiths on behalf of the NACP

The NACP wish to make the following comments in response to Examination question Q2.14.8 and the applicant's deadline 5 submission.

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 Tregale, 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 Tregale, 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 deadline 6 response

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, Tregale, 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.

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 Tregale 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 Tregale 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 these were appropriate. 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 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. A continuous shared use path from Nanner Road to the Magnox Nuclear Power Station needs to be in place prior to the closure of Cemlyn Road and 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. The NACP have previously noted, at deadline 2, deadline 4 and during the accompanied site visit, concerns 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.

On balance, the NACP view is that the other shortlisted option is more appropriate and safer. Cyclists could use a 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. From the roundabout to Tregele the upgraded shared use path could be used and the original Tregele crossing point navigated. 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 a single diversion during both construction and operation is preferable to avoid confusing cyclists! The construction phase is estimated at around 10 years and operation at least 60 years. With these timescales the route selected should be the one that will encourage cycling for 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 would be an 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.)