

This is a Waunfawr local resident's response to the Examining Authority's written questions and requests for information to assist with the assessment of the Glyn Rhonwy application.

The sections which we feel are most applicable to our concerns are sections 6.8-7.24. Residents along the proposed Waunfawr access route are keen to contribute their opinions in the matters which directly affect them in terms of transport/traffic/noise and vibrations. At present we have been excluded from any meaningful dialogue with the Gwynedd Council and in particular the highways division of the council (we have been told a meeting may be arranged once the scheme is approved). This may be normal procedure but we would be grateful if you would consider our views alongside that of the Council as the proposed scheme has already brought the residents months of anxiety over the future safety and peace of their homes.

**6.5: Q to Gwynedd Council: Is the scope of the baseline traffic surveys appropriate for the DCO development?**

A: Residents: We would contest the validity of the SPH baseline surveys along the "Cefn Du" road of Waunfawr, particularly along the final section of the road above the cattle grid.

Traffic impact estimates by QBC (2012) and SPH (2015):

In 2012, QBC compared their projected construction traffic to a realistic base flow assessed by a 12 hour traffic count on 13<sup>th</sup> June 2012. However, the projected construction traffic numbers were unrealistically low (when comparing with the numbers used in their DCO application from 2015), leading to an unrealistically low perceived impact on residents.

A second traffic count commissioned by QBC/SPH in March 2015 apparently yielded a 54% higher traffic count for the road to Cefn Du. Despite repeated requests, QBC/SPH have so far failed to provide the documentation. The 2015 count was used in the DCO application (2015) to assess impacts on road users and residents. The impact obviously seems less the higher the base flow used to compare with construction traffic numbers. The 2015 count is potentially compromised by its overlap with pilot drilling operations on Cefn Du as these were due to start around the time of the 2015 count. In the revised application by SPH submitted for a DCO in 2015, the projected construction traffic numbers are vastly increased (doubling of vehicle movements and 5-10 fold increase in heavy goods vehicles), despite the developer assuring local residents that nothing above ground is changed in the new application.

In order to realistically assess the impact of the projected construction traffic numbers, the residents of Waunfawr carried out an independent traffic count, following the methodology used in the 2012 traffic count commissioned by QBC, in order to assess the validity of the two previous counts referred to by QBC/SPH. The results of this are supplied in the written submission of the residents submitted under the name of Jane Huuse. We believe that a baseline survey should be carried out above the Waunfawr Cattle grid as this would show the true magnitude of disruption this development would have on residents in cottages along this stretch of road (currently ~ 35 vehicles past the houses a day: proposed scheme would see hundreds including a significant proportion of HGV's). In terms of effect categories the levels of disruption would be fulfilling the highest categories available (>500% increase in many months) but what are the consequences? Will SPH have to mitigate? To us this could mean leaving our homes, what does it mean to SPH?

**6.6. Applicant: Gwynedd Council: The methodology suggests that a 15% increase in HGV and other vehicle trips would be considered a 'minor effect' and that a 'high effect' on a local road can be considered not significant. Please comment**

We believe that with incorrect baseline data provided by SPH, an observation proved by our own 2016 village survey, most of the categories they use would be meaningless anyway. Please see Jane Huuse's written submission.

- 6.8. Applicant a) Please provide a detailed justification of the significance of impacts identified in tables 12-23 to 12-25 [APP-079].  
b) Why have the magnitudes of impact been categorised at the particular levels?  
c) How do the magnitudes of impact relate to the identified increases in traffic flow?

We also query this methods used for category allocation

6.9. Applicant Please clarify the basis of the figures for the number of units and total number of movements of each type of vehicle in tables 12 - 12 to 12 - 22 [APP -079], including figures identified for 'construction worker bus' and 'site engineers etc'.

And

6.11. Applicant: Please clarify the basis of the assessment of 'worst case' scenario traffic impacts outside normal construction hours, including additional working that would be approved under draft DCO [APP-043] requirement 16 and any activities not defined as 'construction work'.

Please could the residents of Waunfawr know what the extra 86 one way trips from Q6 to Q1 refer to? Will these be limited to the 7-19h? Do these include HGV's or any other noisy traffic. Can SPH guarantee that these additional trips which were not mentioned in the 2012 application are not related to workers on the 24h shifts? Can SPH guarantee that the Waunfawr access road will not be used during the night by engineers, particularly later on into the construction phase when the penstock tunnelling has almost reached Q1?

**We feel the 7am-7pm is antisocial and suggest for the health and wellbeing of the residents (should the scheme go ahead) be restricted to 8 am-6 pm (Monday-Friday).**

The "busses of workers" are they still meant to remain on site for the 12h shifts? What happens if they want to eat offsite or head to local cafes for lunch or shift change over? Could this not add hundreds of extra vehicles a day to the predictions i.e. jumping in the engineer's cars or their own (once the scheme is underway) to pop down for a bacon bap? What is written in to the application to prevent this scenario happening?

6.16. Applicant: Gwynedd Council

- a) Does the proposed development have the potential to become a site visited by tourists?  
b) If it does, what are the consequences for the traffic impact assessment?

As residents and members of the community who regularly enjoy walking in this area, we would urge the landscape to be left as much as possible in the manner it is at the moment. Improved parking and road widening would ruin the ruggedness of the present landscape and bring more night time crime, boy racers and fly-tippers to a dead end mountain lane.

6.19. Applicant: Please respond to the concerns raised regarding traffic issues in the relevant representations from Ceris Meredith, Tom Hutton, Mads Huus, Dr

Jane Huus, Christine Jordan, Cherry Barlett, Dorrie Jandling, Mererid Llwyd, Tom Hutton, Thomas Jones, Alessa Jaendling and others.

Residents along the proposed Waunfawr access route have not had any response to their raised concerns. SPH has failed to reply to emails regarding initiation of blight surveys and have declined invitations to meetings with residents. Please could the inspectorate ask SPH to communicate with the residents?

#### 6.21. Applicant:

a) Please provide more detail in the draft Construction Traffic Management Plan (CTMP) included in the draft CoCP [APP-142] to demonstrate how the mitigation measures will be delivered, including the mitigation of specific impacts on local people at the specific locations most affected by traffic increases, speed limits, traffic controls, banksmen and escort vehicles and specific measures to be taken to mitigate impact during peak hours and the school run.

b) What confidence is there that the mitigation measures will be successful in ensuring that the residual impacts are no worse than determined in the ES and what is the justification for that?

At present the residents along the proposed Waunfawr access route feel in the dark regarding how SPH intends to minimise the noise and vibration impact and sheer disruption to their daily lives which is likely to result from the routing of hundreds of construction traffic meters from many residents living rooms and bedrooms. In some cases isolated cottages higher up on the Waunfawr access road will have traffic touring meters from their roofs, their outside space dominated by the sound of blasting and traffic, whilst residents inside fear the chance of landslip and structural collapse of the buildings they are in. Nothing has been done to arrest these people's fears. Most reference to mitigation is to widening of the road by over a metre outside these properties. This is hardly a means of mitigating the listed nuisance/risk of death. We would suggest that SPH draws up a table of how it intends to mitigate the nuisance it's scheme would have on all houses along the access route (56 use the Waunfawr access route to access their properties). Will SPH for example be providing sound shielding fencing to reduce the noise? Will they ensure their "Bespoke" passing spaces are well away from houses along the road so not to add a soundtrack of airbrake screeching to the soundscape and permanent depreciation of people's homes?

We have asked SPH many times if we could have a camera system which would monitor the construction traffic during the development phase, allowing culprits who violate the traffic agreements to be apprehended and the problem mitigated. Could this be written into the agreement?

#### 7.1. Gwynedd Council: Is GC satisfied with the base line noise and vibration data and with the assessment methodology?

The residents along the access route are not happy with the noise and vibration monitoring as the methodology was flawed (See Jane Huuse's written submission for SPH errors).

#### 7.8. Gwynedd Council: SNPA NRW

a) Are GC, SNPA and NRW content with the scope, methodology, basis of the sensitivity and magnitude criteria used in the assessment?

b) How should the noise, vibration and air overpressure impacts from blasting be assessed?

The modelling of the blasting noise and noise of dumping 850,000 m<sup>3</sup> of slate above the village on residents living along the access route is not accurate. SPH indicate no noise at Hafod Oleu cottages.

We can hear trail bikes at the current slate heaps easily in the gardens. This noise pollution is likely to be severe adding to torment from construction traffic.

7.17.Applicant Gwynedd Council:

- a) Please clarify the construction phase consultation, communication, monitoring and complaints proposals and the proposals to establish a local liaison group.
- b) Please clarify the measures to be taken if construction noise or vibration limits are exceeded and how these are secured in the draft DCO [APP-043]?

The residents of Waunfawr have not been included as yet in any liaison group. We would be keen to see if there is any possibility for SPH to pay for alternative accommodation for most affected residents during the noisiest months of construction.