

To: The Planning Inspectorate  
3/18 Eagle Wing  
Temple Quay House  
2 The Square  
Bristol, BS1 6PN

**Re: Comments on applicants response to our Relevant Representation and Comments to the revised DCO**

Dear Sirs

Whilst we hope SPH will address our more complete submission of March 2016 in detail, we provide here some observations on their responses to our initial representations provided in SPH\_GREX\_RRD2\_01. We also comment on the revised DCO.

SPH dismissed our representations submitted January 2016 by stating that pumped storage is efficient and environmentally sound and that the traffic increases would be significant but not too significant and unlikely to cause structural damage.

We do not doubt that pumped storage is beneficial to the environment and the grid, but merely that the proposed scheme has a small energy output for a large environmental footprint, particularly when compared to much more output-significant schemes such as Dinorwig. If one would seek to balance the grid by Glyn Rhonwy-scale storage, one would need to spoil vast tracts of beautiful upland areas as opposed to a few significant developments such as Dinorwig. The applicant completely failed to address this most significant challenge to their scheme in their response.

The traffic issue is a little more convoluted and we provide the following comments against the response: SPH states that they have added 25% to be on the safe side ('worst case scenario'). However, the developer already provided a construction traffic estimate for Fford Cefn Du in their 2012 planning application. That estimate was only a quarter of the estimate provided in the 2015 application, despite the company director stating in press releases and personal letters to residents that "nothing above ground will change in the 2015 scheme". His statement is clearly false.

The 25% buffer should be viewed against the use of a revised traffic count which puts base traffic flow on Fford Cefn Du at 50% greater than their own traffic count from 2012. We request the full details of the 2015 count to verify the validity of the count and the nature of the traffic. In March 2016 we carried out a detailed traffic count at the Waunfawr crossroads also surveyed by SPH and a count of traffic movements above the Fford Cefn Du cattlegrid. This count was within 10% of the QBC/SPH 2012 traffic count, further suggesting their 2015 count is spuriously high and unsuitable as a baseline.

As set out in our more detailed representation submitted in March 2016, the traffic increases on Fford Cefn Du will be more than doubled at the cross roads in most months and the increase above the cattle grid will be quadrupled. In terms of HGV traffic it will be an increase of 10-35 times (1000-3500%) relative to the base flow of 1-2 HGVs per day on Fford Cefn Du (East).

SPH suggests widening the road to 4 m between the cattlegrid and Q1 and construct passing spaces at set/strategic intervals. Where are these passing spaces meant to be exactly?

We do not want a wide road going to Q1 as this would potentially open up the presently peaceful and beautiful hillside for further developments, potentially ruining it for generations to come. We strongly object to the widening of the road and to the construction of passing spaces which inevitably end up being used as parking spaces by drug users and tourists alike. Should development go ahead along Fford Cefn Du we urge the developer not to locate passing spaces near properties along Fford Cefn Du as this would cause enhanced nuisance and blight to the affected properties.

We are genuinely concerned for our safety and property. The developer claims that construction traffic is proven not to cause structural damage. However, other credible sources claim that construction traffic can

cause significant structural damage to houses. Such opposite viewpoints are common in science and to be fair, the developer really should take a more balanced view when exercising their 'best judgement' when evaluating the impact of their actions on residents and leisure users of Cefn Du. We reiterate that many of the houses in upper Waunfawr have no foundations and are located on precarious slopes of 20-25% average gradient with some sections being vertical. In some cases houses are located adjacent to and below the road level with abnormal loads and HGV road trains providing real threats to the stability of ground and buildings.

In summary, the use of Fford Cefn Du to access Q1 for this development is unacceptable as the route is unfit for purpose and the impact of construction traffic would be adverse in the extreme. Many residents are considering leaving the area altogether because of the nuisance and danger posed by the development. Why will the developer not consider the construction of a short track within the development boundary to take construction traffic directly up to Q1 via Q6? This would avoid serious congestion of the local road network and years of nuisance and erosion of the quality of life and leisure activities on Cefn Du.

#### Revised DCO

The revised DCO is not acceptable. The development should not go ahead on the grounds that it has poor output to footprint ratio. It would set an unfortunate precedent for small-output installations with large environmental footprints. The DCO should outline an alternative construction route for Q1 and it should be clear about how the developer will minimize the adverse impact on residents and hill users alike. The common land grab along Fford Cefn Du is not acceptable. The diversion of footpaths around Chwarel Fawr is unacceptable as the proposed site plan will hamper access to large parts of the mountain by severing popular paths used by walkers and riders alike. The DCO if granted should stipulate that the Fford Cefn Du and the area around Q1 and Cefn Du cannot be subsequently developed or used for any other activity than its presently peaceful recreational purpose.

Yours sincerely,

Mads & Jane Huuse

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