

Introduction:

We write this on behalf of a large number of residents located along Fford Cefn Du and members of the Waunfawr community council (WCC) who recently voted against this scheme and the proposed access route through the village. Since attending the previous oral hearing back in March 2016, the Waunfawr Residents Group (WRG) and WCC have found themselves aligned in objection to SPH's 2015 proposed Pumped Hydro Scheme, involving a large dam and reservoir to be located in a popular recreational area above the village.

We oppose the development as a whole as it would set an unfortunate precedent of inefficient pumped storage developments in beautiful upland areas, causing blight to local communities and recreational users alike by destroying the character of the landscape.

This representation will however mainly focus our objection to the use of Fford Cefn Du in a final bid to protect the village of Waunfawr from unnecessary danger, nuisance and blight which this development would bring by routing heavy construction traffic through narrow roads in peaceful residential areas. The stance SPH is taking towards residents of the village of Waunfawr "the inevitable eggs that need to be broken to make their privately enjoyed omelette", is hard to stomach. With their sights on other quarry opportunities beyond just Glyn Rhonwy, many more "omelettes" of the magic 49.9 MW type may be in the process of being cooked up. Granting a DCO to this scheme appears to become easier when its much smaller predecessor was passed by local council. However, the approval was based, among other factors, on grossly (600%) under-estimated traffic numbers and impact on the Q1 access route, on poorly documented noise modelling, and inadequate consideration of the chemical warheads and other UxOs stored in Q6. What other shortcomings exist in the 2012 and 2015 Environmental Statements? Granting a DCO on this basis, would give them the green light to always take the lazy option without proper scrutiny of the documentation supplied..... How many other rural and village communities along peaceful country lanes will be ruined forever in this scramble to grab the UK's upland quarries? SPH have stated their lack of concern to what happens to the villages in the post-construction phase as a result of their company having initiated changes the landscapes around the quarries. Creating industrial grade roads to SPH's newly created slate heaps may lead to years of additional industrial menace in the form of slate removal operations. ***We urge the ExA to deny SPH the DCO and, if this is not possible, to write into the DCO that the access road should only be widened minimally, using temporary surfacing and that it cannot be used to access Cefn Du for further industrial purposes.***

If this is SPH's flag-ship scheme, should they not be giving more consideration to engineering environmentally friendly/temporary construction access routes to their sites starting here, rather than paving quiet country lanes to form new industrial highways through the most beautiful landscapes in the UK, thus putting profit ahead of people and the environment. If pumped storage is the preferred means for storing the UK's energy, why not get this blueprint right from the start and show that these schemes can exist without a major detrimental impact on communities?

Initially, many of the residents of Waunfawr were of the impression this is a green scheme. The public attending the 2012 meetings were reassured by SPH that the disruption to residents would be *minimal*, with only 2-4 HGVs/day moving up the hill and all of the "local" workers being accommodated in one discrete workers bus. However, with the 2012 application in the bank, SPH has revealed a scheme with a far greater impact (incl 19-71 HGVs/day) on Waunfawr without

considering the local impacts in a meaningful or considerate way. With AECOM categorising any nuisance to residents as not worthy of useful mitigation we feel rather powerless. Under the umbrella reassurance that residents' suffering is likely to be only temporary "3-4 yrs" we are meant to gasp a sigh of relief. All can be remediated by an additional layer of tarmac? This is unacceptable as it is a significant proportion of people's lives that is blighted in this way, including new-born and elderly residents whose first or last years will be filled by construction mayhem along this vital access road.

Health matters aside, it is also completely unacceptable that funds have not been set aside to compensate residents for the property devaluation caused by siting an industrial grade road outside ancient cottages perched on the side of the common. It is disappointing that the law should allow one profit seeking individual, by their business actions, to legally degrade/massively devalue another's home. It would have been more bearable if SPH had attempted to communicate (two-way) and find out how they could reduce the detrimental impact their plans would have on residents along the road. Now we are informed that SPH will hold an information meeting, without any consultation, about the use of Fford Cefn Du. If using Fford Cefn Du we ask that the DCO stipulates limited working hours (8h30-18h Mon-Friday and no working Saturday, Sunday and public holidays), speed restrictions (< 30mph), limited widening to be applied from the village until at least Pendas Eithin, no passing spaces to be located outside the properties along Fford Cefn Du.

In view of the 2015 planning our concerns about the viability of this route for heavy construction traffic accessing Q1 have been summarised in our written submission (Jane Huuse on behalf of 40 residents of Waunfawr: Deadline 2 Submissions). We will try not to re-iterate these too much in this hearing rather draw on particular points we feel need to be further examined.

To date, we do not feel that the answers SPH have provided to alleviate our concerns, address the questions we have been asking them. Rather, answers have in general taken the form of "well the council were originally happy with this in the 2012 proposal, and although the scheme's effects on you are notably worse, you are powerless to stop us now".

One such example of this treatment, is from the Noise and vibration – policy, scope, methodology and baseline section 7.1

Jane Huuse Comment: "The residents along the access route are not happy with the noise and vibration monitoring as the methodology was flawed (our written Deadline 2 Submission for SPH errors)" In the latter, we point out that the measuring equipment was "accidentally" not installed prior to the pilot drill equipment being brought up the road and removed before the bulk of the traffic descended twinned with the omission of SPH to log/document directly their exact traffic movements in order to correlate any cause and effect registered on their sound monitoring equipment.

SPH response: "The Applicant does not agree with this statement and refers the Applicant to the Gwynedd Council response to ExA First Written Question 7.1 where the council have confirmed that they are satisfied with the assessment undertaken.

We are concerned that if flawed surveys are acceptable to the Council then the public has no protection from ruthless developers? In our view some of the chapters provided by SPH do not attempt to adequately highlight their own data collection shortcomings and if not spelt out simply to Gwynedd Council these appear to have been accidentally missed. If Gwynedd Council has to refer

back to the expertise of SPH to tell them what is acceptable in terms of noise/vibration pollution we worry that construction traffic/blasting/slate dumping noise will be allowed to dominate the living spaces of residents in Llanberis, Waunfawr and beyond.

We appear not alone in receiving the "sorry, too late" treatment. This is an example of their response to the Welsh Government who thankfully was trying to help protect recreational rights of our local communities:

P. 200 of the DCO: Nature, Landscape & Outdoor Recreation. The Welsh Government Comment "There is quite an emphasis on the impacts of tourism and less on the impact of local recreational users and therefore perhaps local needs need to be emphasised more".

SPH response: "Chapter 15 has undertaken an assessment on socio-economics and the conclusions of this have been accepted by Gwynedd Council".

If this response is fit for the Welsh Government, we do not have strong confidence our objections have any weight.

However, despite perhaps being non-planning policy savvy (most of us holding down jobs), we would like to believe that this 2015 application is independent of what has gone before and will be decided on the grounds of merit and fairness. We would therefore like to appeal to the ExA and re-iterate our objection to the proposed access route through Waunfawr. If an alternative route is to be sought we propose (and discuss in later sections of this representation) that this should be through the Glyn Rhonwy Industrial Site on the Llanberis side of the mountain.

A direct route between the quarries would only require a temporary access track to be made over a small distance of a mile or so from Q6 to Q1 as opposed to laying down 3 km of tarmac and 3 years of gridlock in Waunfawr. In SPH' 2015 DCO application a third of the traffic using Fford Cefn Du is between the two quarries and a direct route would thus save time and fuel for the developer on an everyday basis. The additional mileage imposed by routing inter-quarry traffic outside Glyn Rhonwy is approx. 500,000 miles over the course of the construction. ***What are the valid and compelling arguments against choosing the direct route? Simply arguing that alternatives are many and too much hassle to scope out is***

Is SPH sure that all the parties it mentions already have/or actually would object to the construction of a temporary road between Q6-Q1?

As residents we have heard numerous justifications from SPH for why they "need" use our lane (Fford Cefn Du) turning it into a permanent industrial access route. We have been told it was at the request of the Council (Highways), NRW, SNPA, CADW, the residents of Deiniolen, Fachwen to name just a few. However, after approaching many of these groups we are concerned if this subject was broached adequately or at all. Certainly, we get the sense that, if these meetings happened, they were not formally documented. In most of the DCO documentation (particularly in responses to ExA's questions) there is no evidence that the aforementioned bodies were asked to evaluate the possibility of siting the access road on the Glyn Rhonwy side. We fear that their initial choice of Fford

Cefn Du road was poorly thought out scramble to make the least work for the developer, and by understating the vehicle numbers (5-7 fold increase in construction traffic in 2015 predictions relative to 2012 plans) they would be able to, with limited scrutiny, secure access to Q1. However, having to now provide Highways with more realistic traffic flow predictions and road surface assessments it is increasingly becoming evident that even for SPH this may be a more costly option if people's safety along this road is to be addressed.

Based on new avenues of enquiry and rational thinking we would like to challenge SPH on the merit of causing such immense nuisance to the residents Waunfawr when the possibility to route the access road away from large numbers of residents (> 100 properties directly affected) exists.

Query 1: Assumption that this development and access route is supported by Waunfawr Community Council

Having enquired with WCC we find that they are in strong opposition to the up-scaled scheme. In particular, the surprisingly large jump in predicted volumes of construction traffic documented in the 2015 application. They strongly object to the routing of heavy construction traffic through the village of Waunfawr. They would therefore support further investigations of alternative routes through Glyn Rhonwy, regardless of any carrot on stick funds on offer from SPH.

Query 2: (Highways) support for the routing through Waunfawr

The Waunfawr residents group had a meeting on 12.05.2016 with Gareth Roberts from the Gwynedd Highways Department. At SPH "QBC open day events", residents and WCC were told by members of SPH that the Council were instrumental in initial choice of the Fford Cefn Du road. We have now been informed that this simply is not the case and this was never discussed between the two parties. Highways informed us that they would have been neutral to the choice of access and would have been equally happy to explore the possibility of a route from Q1-Q6 through the Glyn Rhonwy Development Site to Q1 should the applicant choose to pursue this.

Query 3: Not so sure SNPA were strongly opposed to an access route in the Llanberis side between Q1-Q6?

A joint letter was drafted between the residents group and the WCC and was sent to the Park Authority at the end of last week querying their opinion on the proposed access route. I duly received an email from Gareth Lloyd on behalf of the Park Authorities stating:

"I cannot recall any specific discussions regarding any preferred access routes to the proposed development. From the SNPA's point of view it would make more sense if the site was accessed from the north rather from the south through the National Park".

"The National Park Authority is not a Highways Authority and has no view on the merits of the proposed access. The re-evaluation of the route is a matter for SPH, Gwynedd Council and the ExA".

Query 4: SPH claims of CADW were strongly opposed to an access route in the Llanberis side between Q1-Q6

Another significant barrier SPH provide to the routing of the access route between Q1 and Q6 (on the Glyn Rhonwy side) is CADW's opinion on the route. We have asked the council if we could see any of the alternative routes considered by SPH on that side of the mountain but we are still not

sure if any exist. ***It would surely be difficult to object to the choice of route if you have never been presented with it!***

SPH cite considerations of ecology and archaeological heritage as reasons to prefer the Q1 access through Waunfawr. However, in a letter from Ashley Batten (senior Planning Archaeologist) to Gruffudd Glyn Llewelyn (Gwynedd Council) dated April this year, it is clear SPH has already found it perfectly acceptable to make inroads on the mountain's archaeological heritage, and much more so in the 2015 proposal pursuing the more profitable 100 MW scheme.

When comparing their 2013 TCPA with the more recent 2015 TCPA Ashley notes "It is clear that the impacts on the registered Historic Landscape are significantly greater than they were for the original TCPA. This increase impacts mainly affects HLCA 6 where significant numbers of archaeological monuments will be lost, many of which are of high value and where a large percentage of the character area (from 7.3% to 31.2%) will be affected by the proposed development." This is a sacrifice worth paying for increased profit margin, but SPH would not expect such a sacrifice for the wellbeing of the 1500 residents of Waunfawr. Seems a little unfair? Again SPH we must remind you about your unequivocal statement: "I can't say it more clearly: nothing above ground will change in the new scheme....."

Query 5: SPH claims residents of Deiniolen and Fachwen would be opposed to an access route in the Llanberis side between Q1-Q6

At the expense of sounding like NIMBY's, we very much doubt that many residents in Deiniolen miles across the valley would object to a distant temporary access track being sited directly between Q1 and Q6. And those in Fachwen are unlikely to suffer anything as miserable as 3 years of lorries/vans/ labouring up and thundering down the mountain right outside peoples' front doors. Incidentally how many responses did SPH have from Deiniolen residents? We believe the question about access route options was not part of the initial questionnaire and we feel that SPH is choosing to prioritise the comfort of less proximal communities as their ultimate excuse. We feel a solution could be found that meant the scheme did not make NIMBY's out of anyone rather a temporary route could be engineered on the Llanberis side of the mountain away from existing houses.

Query 6: Economic wisdom

As briefly mentioned earlier, there is some question over the economic wisdom of using Fford Cefn Du. This would involve "carrying out major Highways improvements on a dead end, presently charming lane, utilised by walkers from near and far, blighting it for years to come. The Fford Cefn Du road (being at least 3 km of road) will need to be excavated? (posing threat to walls balanced on above road level banks), and almost entirely re-engineered, re-plumbed (village water supply) and camber issues addressed. This will then be re-surfaced, to the great disruption to the residents (we are possibly facing 6-9 months of danger, delays and nuisance from noise and fumes) and no doubt Fford Cefn Du will be subject to repairs for years to come. Surely it would be less costly and more environmentally friendly to focus efforts into engineering a temporary, short stretch of road between Q1-Q6. As Cherry Bartlett points out, much steeper gradients have been tamed for other projects in similarly challenging hillside environments in Gwynedd and elsewhere.

Engineers amongst our community have done basic calculations showing that a direct Q1-Q6 route utilising slate waste would indeed be viable and much cheaper. We would have limited objection to

occasional maintenance teams using the Q1 access after the temporary road was removed from the Llanberis side. SPH have assured us that this would not be disruptive.

We have spent much time attempting to contact the Crown Estate. Although cryptic at times, we were put in contact with Ed Dixon who claims to manage assets of the Crown Estate in this area. He was aware of the negotiations with SPH and seemed sympathetic to the fact that the sale of the Crown's land to SPH was against the will of the Village of Waunfawr and the Community Council. He was informed that residents believe this sale could ultimately lead to compromised pedestrian safety, visual degradation of the common, and that it inadvertently encourages fast traffic to recreationally use this new industrial road. He suggested that the Crown would not want to complicate the sale, but that it would be within the inspectorate's derestriction to ask SPH to consider our alternative suggestion. This being to use a temporary mesh for sections that needed the additional 1.25-6 m of widening, removing this at the end of the construction phase. We therefore realised that appealing to the aforementioned members in charge of the Crown's Estate was a little futile when we not cash-clad developers.

We also have had much difficulty in finding out how we "officially" object to the swap of the Crown Estate land (immediately adjacent to the road) for the new tarmac highway. We were told by SPH that there would be an opportunity in the future, but when is still unclear. If SPH would be kind enough to elaborate on this procedure and provide a time frame then the residents and members of the public who use this lane can get started on this process.

Someone mentioned that SPH, following on from recent road coring exercises along the proposed route, have already attempted to negotiate a reduced thickness of road surface materials than conventionally deemed safe. Is this a sign of their future commitment to ensuring the safety of residents, workers and recreational users' safety?

In light of this new information, the community of Waunfawr appeal to the examining authority to request that SPH abandon their current choice of access route and specifies they choose a route that will affect fewer humans and which has the potential to be re-landscaped post construction.

If a DCO should be granted that utilizes Fford Cefn Du

Should our appeal for SPH to use another route fail, we fear that the DCO prepared by applicant as it currently stands, fails to adequately protect the safety of residents and recreational users using the lane. Despite the best efforts of the community of Waunfawr to provide SPH with written and pictorial documentation supporting the validity of our concerns (c.f. Jane Huuse Submission Deadline 2 Documents), we feel these have on the whole been disregarded and dismissed by SPH as a mere inconvenience of a planning process in full swing, with one forgone conclusion. We would like better answers. We are not sure what the planning inspectorate thinks about points included in our community's submission but we are pleased and excited that many of these are reflected in the inspectors questions posed to SPH at this oral hearing. Thank you.

As you probably can imagine hundreds of hours of the community's time has already been pooled in a united attempt to protect Cefn Du for future generations to enjoy and to avoid years of noise nuisance and additional danger. In return we hope we will still get the opportunity to hear clear and valid reasons from SPH for inflicting this suffering on Waunfawr and the true lengths they can (if they want) go to minimise the impacts on the residents and recreational users. At present we feel

this is not happening. Hopefully the remainder of the examination process may help bring some clarity to the murky responses we have had so far.

This section provides a general feedback to SPH's response to the village's written submission for the Deadline 2, as well as flagging up outstanding concerns and questions that we would like answered by SPH. We have highlighted some of our most important concerns and provided suggestions of how SPH could help mitigate these.

1. Road safety

This has been our primary concern and as mentioned we feel little concession has been made by SPH to address points made in our submission. The safety improvement /nuisance reduction concessions they claim to offer, tend to revolve round the finish on the road surface, widening the road above the cattle grid, the changing of traffic priorities at the cross roads or use of mirrors and banksmen. These measures appear to aid smooth access for the construction traffic and are of little benefit to residents. They don't care about improving safety measures to provide for their co-sharing road users. There are still large sections of the road where anyone walking/riding/cycling will have path or physical option to avoid oncoming HGV's. The banks in places are too steep to co-share with oncoming traffic. Horses/sheep will be indifferent to the need for a convoy of lorries not to have to halt on steep sections of road and will be forced to turn round and wonder aimlessly (sheep) back up hill until they can find a wide enough space for the lorries to comfortably pass. This is likely to lead to delays for construction traffic and residents.

We can see SPH are worried about any damage to the road surface but what about the road users/livestock? They tend to dent more dramatically than tarmac.

The only liability we can see regarding the road is in Section 2.4.4 of the construction Traffic Management Plan. Here SPH state "The Applicant and Principal Contractor will be responsible for any damage to the Ffordd Cefn Du caused by the construction traffic. Regular inspections of Ffordd Cefn Du will be undertaken along with the Highways Authority, with all communication regarding any likely damage caused directed to the ELO." We are aware that this deals with the road but *not* the properties along the road. A number of residents were also told at the "QBC/SPH arranged meetings" that a potential "damage bond" would be held/administered by the council on behalf of the applicant. This would be used to mitigate should any accidents related to the construction traffic occur. Having discussed liability issues with the Highways Department last week, we are of the understanding this is not the case. They were unaware of any damage bond covering residents' property.

In the CTMP document SPH state "A maintenance and repair system will be implemented as necessary and agreed with the Highway Authority to avoid any significant adverse effect to local residents houses from vibration(structural surveys will be undertaken as per the Noise Management Plan of selected houses who are concerned about vibration). What does this mean? So if SPH can see precarious ancient cottages located immediately adjacent to the road (cm's in cases) they will not on their own merit carry out a survey, rather squeeze the 4 m wide, 90 tonne crane past and hope for the best? A number of the residents are elderly and have recently been in hospital for long periods. They are not always able to respond to SPH's plans. Would it not be better to have a survey conducted now so SPH could get a realistic idea of the state of buildings (and potential landslip planes) along the proposed access route so they can adequately engineer the new road to minimise any chance of collision/collapse and model how best to manage traffic squeezed up against these buildings? Could SPH please spell out what is involved in their "maintenance and repair system".

In other sections of the DCO, the applicant suggests they would not be directly accountable for any damage to residences along the access road should this occur during the construction period, instead this would be a civil matter for residents to pursue with the council and through the courts. This fills residents with fear. Not only do we have to endure years of disruption, nuisance and danger, but if something should happen to our property (especially if we were out), we would then have to engage in lengthy law suits to repair the damage. We feel that this is an indication of the lack of care and concern this company has for the residents residing along the access road who have unwittingly found their homes and gardens under environmental threat from a profit seeking investor. Could we at least have a visual documentation (i.e. Surveillance cameras at the cross-roads and other key sections of the access road which documents traffic movements so timing and accountability would be less unconstrained).

We are unsure if residents within a few metres from the road will need to inform their insurance companies (properties/vehicles/livestock) of the planned road improvement works and change of road type/use by heavy construction vehicles. If this is the case, it is likely that residents will be stung for increased insurance premiums needed to facilitate the SPH scheme. Should there not be a fund set aside for helping residents with this increase in their costs as a result of the scheme?

Pollution Danger to selected residences

There are a number of properties located along the proposed access route where construction related traffic is likely to be stationary during periods of the day (with engines running), or where diesel lorries are likely to strain their engines due to adverse gradients. Residents are concerned about the potential air pollution in their gardens/ and ill health caused to pedestrians still attempting to use the road.

One example, of such a location is the major van/lorry passing space sited along the widened bend outside Pendas Eithen. This is immediately above the garden of Hafod Oleu Uchaf. Noise from air breaks and pollution caused by idling diesel engines, if not carefully controlled will, could make this outdoor (and indoor) environment unpleasant and a danger for children to play in. Does SPH intend to initiate air quality monitoring or at least require construction traffic to switch off engines when waiting for upcoming convoys? Residents in this particular property already fear increased risk of landslip (building collapse) and will if the scheme is passed be severely disturbed by construction traffic noise entering the property through the roof space which is flush with the road level, not to mention loss of privacy from two sides.

The current road improvement documents indicate that the contractor will be removing meters of the common to facilitate their construction traffic, and provide passing spaces and wider bends (encouraging subsequent road races). One nuisance mitigation suggestion the residents in the cluster of Hafod Oleu Cottages propose, is that SPH could move the existing road 2-4 m away from these cottages helping to protect them from damage. Planting a belt of conifers could additionally help dampen noise and reduce the devaluation which would occur related to the change of their access from a quiet country lane to an industrial road.

We have repeatedly told SPH that we object to the widening of the road above the cattle grid to a "minimum of 4 meters". We are also concerned that the term "single lane" has been dropped. Creating an industrial access route outside ancient cottages will cause devaluation of these properties and will encourage fast traffic through the village. The existing dead end track is already part of an existing unofficial race circuit from the dock at

Caernarfon to the top of Cefn Du and back. Changing the priority at the Groeslon cross roads will only exacerbate this further. The highways suggest only limited traffic calming measures could be installed due to the nature of the road (out of the main residential area). We do not want this added danger brought to the village by SPH! Or anyone else for that matter. We would like the exact details of traffic calming measures to be written into the DCO if at all possible.

In terms of common land.....We also have had much difficulty in finding out how we object to the swap of the Crown Estate land (immediately adjacent to the road) for this new tarmac highway. We were told by SPH that there would be an opportunity but when is still unclear. If SPH would be kind enough to elaborate on this procedure and provide a time frame then the residents and members of the public who use this lane can get started on this process.

Unforeseen flooding risks?

In the section of road above the cross-roads where housing is more dense concern has been raised as to the potential flooding problems which may ensue if the road level is raised as part of the road improvement scheme. Many of the residents have created their own runoff protection mechanisms in their drives. We assume that raising the profile of the road will not create problems for people leaving their drives (some vehicles have low clearance)?

2. Prevention of severe traffic congestion along Fford Cefn Du and neighbouring road networks

In the SPH Traffic Management Plan 2.4.4: SPH pretends they can help mitigate congestion and construction traffic/resident priority struggles through a chivalrous approach:

SPH states "All construction vehicles on Ffordd Cefn Du will give way to other users such as a group of walkers, horse riders, cyclists or another car"

We would query the practicality and reality of this claim. Considering that SPH states in other submitted documents that HGVs would struggle to start once stopped on the hillier sections of Fford Cefn Du, they may be reluctant to stop.

If convoys of say 5 HGVs per hour use the road (a figure based on 36 HGVs/day accommodated between 8.30-4.30 pm), that would mean that any downward traffic consisting of residents/ construction vehicles encountering these up going HGV vehicles after the Groeslon Cross roads would have to reverse ~ 1 km, uphill round, a presently blind bend to access the nearest convenient passing space. This is likely to create huge delays for all residents and contractors wishing to use the lane. If these users included downward travelling emergency services (as has happened recently) minute delays could be fatal. Also little consideration has been made for heavy agricultural vehicles with livestock trailers which regularly nip between fields and are more cumbersome to reverse uphill back to suggested passing spaces. Has traffic modelling really been carried out? With the inability to widen the road east of the Groeslon Crossroads we still see major gridlock being inevitable along this single track lane.

In view of the 2015 plans for an additional daily flow of 86 engineer vehicles travelling from Q6-Q1 via Llanrug it may be worth again pointing out that the narrow lane which joins Fford Cefn Du above the cattle grid is likely to be their preferred method of joining this road. With likely increased waits at the Groeslon Cross Roads linked to SPH's wish to change existing traffic priority patterns, major problems are likely to occur. This is an exceptionally narrow lane which has in places tall stone walls along its' margins and sharp bends. Sat Nav systems

often indicate this as a viable route to access houses along Cefn Du which inevitably ends in phone calls to residents from stranded couriers. Frequent wall damage is anticipated here, and if this is not regularly monitored/fixed by SPH the sheep will make their way down to the main road further endangering drivers/ slowing construction progress. Also it could if adopted, add a huge increase in traffic joining the Fford Cefn Du road at this junction: a major safety concern as this is located on a notoriously awkward blind bend. If lorries were forced to stop on this bend to accommodate this new traffic, they would then have to restart on one of the steepest sections of the road. This would be extremely difficult (as vans currently struggle) and this is an example of a place where traffic will cause extreme noise and pollution to the residents in the houses immediately adjacent to the lane. Again has any attempt been made to visualise traffic flow on this road? If SPH gets this wrong and it is a complete gridlock as most of us residents envisage this could add years on to the construction phase????

Blocked private access

SPH also state "No drive ways on Ffordd Cefn Du are to be blocked by construction phase traffic including large or abnormal loads..." Again how can SPH assure residents this is the case? With so few passing spaces below the cattle grid and large construction and supply vehicles using the road in both directions, it seems inevitable that problems will occur.

We can only stress again how vital this road is to our community and that major road blockages will have a severe impact on our daily commutes/lives. Also the plans SPH has submitted to the highways still ignore the importance this road has as a major conduit for walkers and cyclists to the village to the mountain above. With no footpaths along the road and SPH's plans submitted to the highways department obliterating many of the verges in the lower section of the road (below the cattle grid as part of a widening scheme) residents will no longer be safe. Residents will feel marooned, surrounded by construction noise and pollution.

Another anticipated drawback of being hemmed in by construction traffic is the potentially adverse change in resident transport patterns. Not feeling safe leaving their houses by foot, it seems likely that resident's car usage will increase. At present a number of the residents take advantage of home delivery services for groceries and household goods. This often blocks the road for 5 mins at a time, as drivers help customers transfer their shopping indoors. We anticipate this usage will increase dramatically when people lose patience attempting to run daily errands against the flow of construction traffic . These types of services are likely to be even more subscribed if residents are often expected to park in a temporary carpark a distance from their homes to clear the roads for wide loads.

3 Unresolved Traffic Count Issues

As noted in our written submission, the traffic estimates and baseflow traffic counts provided by SPH in 2012 and 2015 vary dramatically. On 13th June 2012, the baseflow counted by QBC was 195 vehicles including 43 LGVs and 4 OGVs (equivalent to 200 PCUs) whereas on 26th March 2015 SPH counted 247 vehicles including 63 LGVs and 15 OGVs which they equate to 298 PCUs. These numbers are dramatically different but no explanation is afforded by SPH. We suspect that the larger number in March 2015 (unusually high number of van users) was traffic related to a pilot drilling starting the following week /road recognisance mission, although SPH denies this being a factor.

The residents of Waunfawr undertook an independent baseflow count on 17th March 2016 showing that 181 vehicles used Fford Cefn Du east of the crossroads between the hours of 7 and 19, including 35 LGVs and 5 OGVs, equivalent to 190 PCUs, remarkably close to the 2012 QBC count and suggesting the lower figure is more representative. On all arms of the crossroads the residents' count was within 8-11% difference of the original 2012 QBC count, corroborating the lower counts as being most representative of base flows in Waunfawr.

In the 2015 impact assessment, which would require scrutiny by the national planning authority, SPH ramped up the estimated traffic volumes using Fford Cefn Du, increasing the number of HGVs ten-fold in most months and increasing traffic in PCU terms 5 to 7 fold relative to the 2012 estimate. The increased traffic and the higher base flow conveniently measured in 2015 gives a net increase in impact of 400% relative to the 2012 impact but the increase in impact is 600% if the more representative lower base flow is used.

The resulting impact measured as % increases in traffic on Fford Cefn Du east of the crossroads is at least a 100% increase in traffic in most months and a 150-170% increase in the traffic during peak construction months, all of which are going to be hugely disruptive to residents at the Waunfawr crossroads and beyond. Above the cattle grid on Fford Cefn Du, the base flow is 61 vehicles/day and the impact of regular SPH construction traffic will thus be more than a 300% increase in traffic and almost 600% in peak months. We consider this completely unacceptable to residents and recreational users and urge SPH and the ExA to consider an alternative route making use of A roads and existing industrial sites.

To summarize the traffic estimates: in 2012 QBC estimated peak daily traffic of 46 PCUs and got the plans passed by Gwynedd Council. In 2015 SPH estimated peak traffic at 341 PCUs in a scheme for which the director stated that nothing above ground would change with respect to the 2012 plans.

4. Concern that the traffic predictions for the village of Waunfawr could have been underestimated

Even in light of these more realistic traffic numbers (2015 predictions), we do not feel that SPH has accounted adequately for additional traffic related to construction activities at Q1: One example is in SPH's neglect to count catering services into the traffic.

SPH admits that "The Principal Contractor is likely to have welfare facilities at Q1 and there is also the *possibility* that workers will provide their own lunch and refreshments.

We would like to know if SPH envisage canteen staff/supply vehicles accessing the site in advance of the first shift (pre-7 am)? This alone could result in a 30% increase in traffic compared with measured baseflow along the upper stretches of Fford Cefn Du. Four years of enduring potentially 6.30 am wake up calls is not a prospect we look forward to. With these subsidiary services overlooked in the traffic

counts, we wonder if there are any other types of unaccounted for service traffic on the cards (security etc)?

5 Blight

Blight is perhaps not the correct legal term to use in the context of properties alongside Cefn Du Road, although off-line blight does seem to apply in this case according to information provided by Highways. Development will negatively affect houses along the Q1 access by changing the character of the road from quiet country lane to industrial service road and by destroying upland recreational amenities. This may cause significant depreciation to properties along the road. Whilst SPH may not be legally obliged to consider compensation of any residents who feel they have to move to avoid the nuisance caused by development, it would be fairer if they engaged in a dialogue in this respect.

The dismissal of the blight issue without due regard of residents' concern is unfortunately symptomatic for SPH's handling of this entire development and we hope the DCO, if granted, will be imposing the most suitable access routes and safe guarding residents against the effects of this development, should it go ahead.