

Submission to Examining Authority for deadline 10th August 2016 – Cherry Bartlett

The ExA has raised some questions on issues that have not been fully addressed so far by the Applicant and Gwynedd Council. The “consultation” held on 29th June regarding the use of Fford Cefyn Du was supposed to give the public an opportunity to raise concerns and hear answers. Few answers were provided, and there has been no feedback from the event. I feel there are many unanswered issues outstanding.

Primary among these is the consideration of the alternative route proposed by Mike Vikovitch at the last deadline. Has this been fully considered? If not, why not? If it has where are the justifications for not using it? Mike’s conversations with the archaeological service indicated that they were not averse to his proposals.

Document SPH_GREX_WED3_03 was provided at the “consultation” to describe the Fford Cefyn Du proposals (Referred to as The Green Road on their plans). This document indicates that AECOM has created the design for the route. There are no gradients of the road shown, the only key relates to the road surface but not the other symbols on the plans, eg are the dots trees/ telegraph poles/ sheep?, where are telegraph poles? where are the roadside walls? where are the properties? where are property entrances? for example no entrance is shown for Penhriw. The sheet entitled “General Arrangement and Pavement Works, sheet 3 of 6” (what pavement?) includes the bend at Penhriw, the angle of the bend on the main drawing looks to seriously under-represent the angle of that bend compared to, for example, the angle shown in the key plan on the same sheet. This is a sharp blind bend on a steep gradient with walls on either side. The poor quality of the drawings provided, which really told the public (who gave up their time to attend) nothing and illustrates the contempt that SPH show to the residents of Groeslon and Waunfawr. When are good quality drawings of the route proposals going to be provided?

I believe that S278 requires a Stage 1 Road Safety Audit (RSA) to be carried out by an **independent organisation** during the design phase. Has such an audit been carried out? If so where are the results? If not, when will it be carried out? Clearly it cannot be conducted by AECOM as they have provided the designs for the road as indicated by their logo on the document SPH_GREX_WED3_03 and could not be described as independent.

There are no passing places proposed below the cattle grid. Are the developers seriously asserting that HGV drivers will reverse uphill, say from the bend at Penhriw, to the nearest passing place above the cattle grid, or downhill between the buildings near the crossroads to give way to other vehicles? I believe SPH are suggesting that the HGVs will travel down in convoys of three or four vehicles, will they reverse to give way? I doubt it. There are no clear passing places for any vehicles or safe refuges for pedestrians and others below the cattle grid.

It now appears that drilling the penstock will take place 24hours per day with the route along Fford Cefyn Du being used to service this activity. This poses additional threats for pedestrians etc during the hours of darkness, for example where there is a sharp blind bend. It also means that the residents will be subjected to even more

disturbance than previously revealed. SPH need to come clean about what their proposals are for traffic outside the proposed times declared to date.

Section 3.4 of SPH_GREX_WED3_03 relates to air quality, but concentrates only on dealing with dust. Mitigation regarding dust depends on washing vehicles etc down, where does the dust laden washing water then go? Down the Nant y Betws?

No consideration is given to the pollution created by large numbers of diesel HGVs and other diesel vehicles passing up and down the route every day. Many properties are very close to the road and residents and non-vehicle road users will be subject to emissions for 4 years at least. This will be very detrimental to the health and well-being of those exposed to it. Although emissions from HGVs have been improved in more modern vehicles there is no guarantee that the vehicles used will be modern, and there will undoubtedly be other vehicles using the route day in day out and the emissions from light van and diesel cars has recently been shown to be even higher than that of HGVs. In 2012 the International Agency for Research on Cancer declared that:

*“After a week-long meeting of international experts, the International Agency for Research on Cancer (IARC), which is part of the World Health Organization (WHO), today classified diesel engine exhaust as **carcinogenic to humans (Group 1)**, based on sufficient evidence that exposure is associated with an increased risk for lung cancer.”*

This puts diesel engine exhaust in the same category as such things as smoking in relation to cancer.

Apart from the everyday symptoms of exposure such as eye itchiness and coughing, a study published in the journal Particle and Fibre Toxicology March 2008 reveals that an hour of exposure to exhaust induces a stress response in the brain's activity.

“If the smell of diesel exhaust isn't enough to make you avoid getting a lungful, new research now shows that even a short exposure to the fumes can affect your brain. Even an hour of sniffing exhaust induces a stress response in the brain's activity.”

Findings, [published by the Department for Energy and Climate Change](#) in 2011 showed that

“Diesel fumes are significantly more damaging to health than those from petrol engines, according to research which shows that related air pollution contributes to lung disease, heart attacks, asthma and other respiratory problems.” Quote from The Guardian.

The level of traffic on the route will be high and, as it now appears, that drilling for the penstock will be taking place 24hours per day, there is potential for vehicles using it at night as well.

Why should the residents and users of Fford Cefyn Du be exposed to these harmful emissions for something they do not want, will receive no benefit from, and will desecrate their peaceful and beautiful surroundings?

Overall, the use of Fford Cefyn Du can only be detrimental to those who live in and visit Groeslon and Waunfawr. It will damage health and well-being, residents will have to suffer noise, traffic problems, pollution and will be living in fear of what will be done, against their wishes, on their doorsteps. The only beneficiaries of its use are SPH.