

**From:** [REDACTED]  
**To:** [Glyn Rhonwy Pumped Storage Scheme](#)  
**Subject:** Please reject the application for a DCO  
**Date:** 09 August 2016 22:21:20

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To the Examining Authority (EN010072)

Dear Sirs

We very much appreciate the efforts to examine the SPH application. However, following several rounds of questions from ourselves and ExA and wholly unsatisfactory replies from SPH we are deeply concerned that the applicant is completely unreceptive and indifferent to the plight of residents in Waunfawr. If the DCO is approved without due incorporation of the Q1 access route, noise from both construction and running of the battery and water (all largely excluded from the DCO), then you are effectively condemning residents in Waunfawr and Llanberis to live in a building site for the next 5 years and potentially causing significant and adverse impacts on residents and environment of the wider area for over a century to come. This is an unacceptable human and environmental impact that should be ample reason to reject the application, especially considering the arrogant dismissal of concerns by the applicant. If the project is deemed strategically important to the UK, I suggest you reject the application and encourage the applicant to re-submit once they have adequately incorporated an alternative access route directly between Q1 and Q6, adequate noise monitoring and baselines and acceptable plans for the expulsion and extraction of water to/from the surrounding environment.

From an ethical point of view, it appears that the applicant initially submitted an unrealistic low impact application to win the support of Gwynedd Council (GC) so that all subsequent consultation would be met with approval from GC in order to ease the project through to fruition. This does not seem a proper way to conduct any sort of business let alone so called environmentally friendly energy projects. Needless to say that the conclusions of the Local Impact Report of limited and mitigatable impacts are not shared by residents in Waunfawr or Llanberis nor indeed by Waunfawr Community Council. It is hugely disappointing to us that the Gwynedd Council has repeatedly failed to recognise the huge impact on the local communities most affected by the proposed development.

At the recent open day detailing aspects of road construction to access Q1 through Waunfawr, SPH had sent their youngest staff member and some consultants from AECOM to discuss their plans with concerned residents who turned out in large numbers. In many cases the representatives did not know their own submitted plans in detail or indeed the plan for the scheme. The whole meeting was largely a tick box exercise on the part of SPH and only served to worry residents along Cefn Du Road even more. The Waunfawr Community Council was strongly against the project before and this stance was only reinforced by the information provided at the meeting.

The plans presented affected retaining walls of adjoining properties and the road profiles presented showed the plan is to effectively turn Cefn du Road into a concrete lined construction corridor that will forever change the landscape of Cefn Du for a distance of over 2 km from Waunfawr to Q1. They had not considered the implications for surface runoff or adjacent properties, nor the impact on residents or road users. Quite ridiculous proposals for traffic management were aired including the suggestion that traffic could be managed by asking residents to phone a traffic manager before driving down or up the road to access their property. We left being extremely concerned that the plans for the road will render it a no-go zone for the

many recreational users as there will be no space for horses, bicycles, prams etc to pull off the road when construction vehicles muscle past.

***In addition to details of road construction there are remaining problems of significant concern:***

Access route for Q1 and penstock should be direct from Glyn Rhonwy (alternative route), because: Waunfawr doesn't want the road to be turned into an industrial access road and doesn't want the construction traffic, particularly not the traffic associated with penstock construction, which is likely to be 24/7. The problems surrounding the use of Cefn Du Road to access road Q1 are manifold, but two overriding problems are:

1. The road will forever lose its country lane character, resulting in a loss of visual amenities to residents and road users (incl Snowdon Marathon). The construction traffic would render the road unsafe for residents, recreation users and school kids for 3-5 years. There would likely be a long-lasting negative effect on property prices along the concrete corridor. No consideration has been made about the visual impacts of such a road in neither Environmental Statement, nor in the DCO and that is totally unacceptable.
2. Construction access and associated traffic (security and catering personnel, out of hours workers, etc) will make it impossible for residents to sleep and thus severely impact on quality of life and livelihoods of residents. This is swept under the carpet of both ES and DCO application and that is completely unacceptable.

Residents' sleep was already disrupted nightly during pilot drilling on Cefn Du, which was a much smaller operation but nonetheless included highly disruptive movements of security personnel out of normal working hours including the night and very early mornings every day of the week.

No recognition of the impact of out of hours work or related traffic has been shown by the applicant and no safeguards have been mentioned in the DCO. We have no faith in the notion of mitigation unless completely firm limitations on timings, speeds and numbers of vehicles and specific and rigorous means of monitoring can be specified in the DCO.

The disturbances associated with round the clock penstock construction traffic on residents would be similar to living in a construction site and is a violation of human rights. If such a violation is granted by the authorities or indeed imparted on us by the developer, we request that adequate and independently managed compensation funds are provided up front to enable relocation of affected residents for the duration of the violation.

Working hours: exceptions are currently not defined in the DCO, and we surmise that exceptions are likely to be frequent and substantial. Indeed, if penstock construction will be from Q1, then the developer would need to either run a hotel at Q1 or ferry workers up and down the road outside the normal working hours, not to mention a huge number of additional concrete and other extra large delivery lorries in their thousands.

An additional problem remains over noise from the construction regardless of whether Cefn du Road is used for access or not:

Construction noise levels are not defined in the DCO and the modelling results provided in the ES must be flawed as, on still days, the residents in Waunfawr can

clearly hear motorbikes using the slate tip area SW of Q1, and forestry and landscaping operations across the valley are also clearly heard. So any slate tipping at Q1 will likely also be clearly audible on still days and nights and should only occur within 7-19h working hours and preferably not on weekends.

Low-frequency noise is a problem for residents near Dinorwig and will likely also affect residents near Glyn Rhonwy. At present this problem is not adequately dealt with in the DCO. We refer to Mike Vitkovitch' submission for this deadline for details of this and other technical aspects.

***Who will ensure that the DCO is adhered to and safeguard the public against developer's short cuts?***

In many cases Gwynedd Council is the authority responsible for granting exceptions, monitoring adherence to DCO, etc, but Gwynedd Council also has a significant interest in early completion of the scheme for revenue generation (rates), making this arrangement in the applicant's interest only. Residents are thus extremely worried that their interests will not be considered if a DCO is granted, effectively condemning all residents to 5 year of living in a construction site.

***We therefore strongly urge you to reject the application.***

If a DCO is granted please can you ensure that adequate and enforceable limits are placed on traffic movements and noise. In particular we sincerely hope that there will be a total ban on construction traffic (incl actual construction traffic, workers, engineers, security guards, catering personnel etc) movements on Cefn Du Road outside nominal Q1 construction hours of 7-19h week days, 7-13h Saturdays. Limits on noise, both construction and operation noise are essential to the villages of Waunfawr and Llanberis and anyone in their vicinity. 24 hour tunnelling operations should not be allowed unless they can be 100% guaranteed not to incur out of hours disturbances from traffic or noise from slate disposal etc. We urge you to specify that tunnelling of the penstock may only be carried out from the Glyn Rhonwy side to save Waunfawr from unnecessary nuisance, should a DCO be granted. At the very least, the DCO should specify that no above ground movements, including dumping of slate in the designated slate mounds and site access via Cefn Du Road, can take place outside the normal working hours of 7-19h week days, 7-13h Saturdays in order to minimize impact on residents' physical and mental well being.

For the reasons mentioned here and many others outlined in previous submissions I urge you to reject the application and only allow a revised application in case the development is deemed of strategic importance to the UK.

Yours sincerely

Dr Mads Huuse



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