

Dear Stuart Cowperthwaite,

I am writing to you on behalf of the local community who live along the proposed Q1 access road (Fford Cefn Du), as well as growing numbers of worried residents who reside in and/or commute through the village of Waunfawr. We are in close communication with the Waunfawr Community Council (WCC) who continues to express their concerns and objection to the scheme. If passed, this will set a precedent for future pumped storage schemes to target and degenerate other beautiful upland areas in the UK, safe in the knowledge that local communities such as ours, pose no barrier to development.

At this late stage in the proceedings, we continue to feel extremely vulnerable and inadequately-protected from the construction-related mayhem this scheme will inevitably bring to our local community. We appreciate the ExA has made extensive efforts to ask SPH important questions and nudge them towards showing some corporate responsibility for those the scheme will impact. However, we feel SPH remain indifferent towards our plight. In fact they choose to rub salt in the wound by pretending that they are consciously planning on; "improving" our open spaces (swapping common land for felled woodland/bog), "improving" road safety in narrow sections (providing mirrors mounted on the walls of peoples homes to protect us from their own wide vehicles/changing traffic priority), "improving" the road above the cattle grid by making a 4-8 m wide tarmac racetrack.....etc.

At this final stage of the examination process the applicant appears still to be providing the ExA with vague and deflecting answers to the questions posed to them by interested parties and indeed by the ExA. Some questions it would seem will never be answered.

SPH's submissions (ES and DCO) still appear to us, to conveniently leave room for future developers to interpret, modify and expand construction activities, to the detriment of the village of Waunfawr.

SPH appears non-committal to setting meaningful limits on the environmental impact on local communities. Unsurprisingly they would prefer to postpone "setting maximum acceptable nuisance pollution/levels to a time after the DCO has been decided when a potential developer has been found". This will presumably be a process involving the developer and Gwynedd Council with little opportunity for external (residents) input in to agreeing these levels? In the interim, the village is left in a state of anxiety desperately trying to guess how much disturbance they should expect to endure if the scheme should get approval. Businesses and residents need closure on these matters so they can attempt to mitigate appropriately for their now significantly blighted futures.

It is hard to understand but it seems that there is NO need for a developer to offer residents protection from noise associated with a site's construction traffic? With almost the entirety of the new traffic flow (>500% increase on background levels) on the road above the cattle grid consisting of construction related vehicles and the road being transformed entirely into an industrial road, it seems that houses along this section of the route will become part of the building site. We think SPH should give more consideration to mitigating the impact they will have on these people as well as others located along the road.

We are obviously extremely concerned that the **main access** (considering the penstock is almost certainly going to be driven from the top down) is to be routed through the eastern part of the village. This is the only drivable recreational access route to Cefn Du and is a favourite walking/cycling/riding route for residents and visitors to the area. It is a disaster for those affected if a national infrastructure development application can be evaluated sufficiently without incorporating the main access route in the DCO considering the scale of the change in road character and use.

The lane works perfectly well in its present state (admittedly a few potholes), on a good day offers one of the most enjoyable walks and drives that anyone living in the area or visiting can hope to enjoy. Widening the bends, which are currently constricted by ancient stone walls and beautiful vegetation, and replacing the grassy verges and stone walls with concrete, tarmac and sheet piling is going to completely ruin the character of the lane. Widening the road to 5-8 m outside ancient cottages is a crime to the landscape. Wide bends and smooth tarmac will bring fast traffic to our village as soon as the scheme is complete, creating danger for normal road users for decades to come. How can SPH pretend to the ExA that they are not ruining an archaeological important resource (dismantling hundreds of year old walls, flattening old quarry buildings to widen road in upper stretch, "stabilising the old slate piles along the road") and ruin an environment many walkers, runners, riders and cyclists cite as their favourite recreational space?

We have seen the numbers of HGVs from the original 2012 plans swell vastly from only 2 HGVs a day to 79/day during the peak construction times. This is unfathomable! Residents were assured in 2015, in writing, that for the new 100 MW scheme "nothing above ground would change". Did we miss something? Are they planning to tunnel from the A55 to make an underground access route to Q1 specifically to accommodate these previously omitted HGVs? If SPH is happy to tell residents just about anything to keep them subdued, we are expecting they may have other bad news for us carefully left out of the DCO, to be "approved" by Gwynedd Council at a later date?

Road construction vs road use

Some confusion exists between those who are doing desktop studies (AECOM) to design the new "improved" road, the Highways who will check the road is built and maintained to the required spec?, the applicant who wants to stuff it with their vehicles, irrespective of the consequences of the local community and *the locals/visitors themselves who have to use the road every day*. At the recent SPH Fford Cefn Du information meeting held in late June 2016, we were alarmed at the disinterest AECOM representatives showed to the functionality of the road they were commissioned to design. On a number of occasions they were unable to even guess at the numbers/make up traffic that was going to have to use the road. They explained that it was not up to them to guarantee that the road worked in terms of traffic volume, just that it was built to industry specification. Who feels safe with this level of commitment to ensuring functionality? The Highways Department explained that it is and will be a public road, so they can not restrict individuals from using it at as they see fit. Does this view override any section 278 agreements on restricted traffic movements when individual workers switch to "members of the public" using this road night during shift turnover or end?

The Highways Department also indicated that they had limited ability protect walkers and residents from boy-racers speeding along Fford Cefn Du in the post-construction phase (90-110 yrs). Currently traffic generally remains slow due in part to being constrained by tall narrow verges and steep bends. Any traffic calming measures would need to be paid for by the developer and this we were told, was expensive. As SPH has not voluntarily offered to compensate for any of the adverse impacts it will be leaving us with so far, and this is not constrained in the DCO, we can guess this will be another life-saving mitigation we cannot count on.

The current 30 mph speed limit only applies close to the cross roads, if permanently routed to this location only, a large proportion of the new industrial road will fall within the national speed limit encouraging drivers if so inclined, to accelerate past adjoining cottages. Many contain families with young children. With driveway-lips elevated to match the extra tarmac required to make the road fit to carry these abnormal loads, reversing out and uphill onto potentially speeding traffic is yet another concern. How can some remote developer come into a village, change the main things that have attracted people into the area, and then not even have to assure that it leaves in place safety measures to mitigate the damage its industrial trail leaves?

Of course to the Highways Department (who have actually been very helpful but constrained by the interests that bind them) and to those such as AECOM sitting in an office at the other end of the UK, you can take the stance that the huge increase in HGV numbers are not an unusual occurrence in many towns when a housing development has been approved.

However, we would argue in most of these situations the developer is looking at accessing a site through a two lane road, one possibly with a heavy existing traffic flow? In this context the HGV numbers proposed for this development may not sound so alarming. However, the total gridlock this will cause along this particular village Fford Cefn Du is shocking!

In our view using Fford Cefn Du for this magnitude of construction traffic and allowing the community to have any chance of functioning remotely normally is incompatible!

What seems to be completely lacking and which should surely be considered an essential piece of information for the examiner to be able to see, is a model of how the developer really expects the construction traffic / local residents to “harmoniously” use this road. There are so many contradictions in the SPH’s traffic management plan, e.g.:

HGVs would struggle to start if stopped on sections of the Fford Cefn Du where adverse gradients are encountered. According to the TMP HGVs, in fact *all construction traffic* would be expected to *yield to residents*. So... on the blind bends these HGVs forced to stop due to 1+ residents/or their own vans/workers, would be able all together (maybe in convoys) to reverse back ~0.75 km downhill, back across the cross roads until they found a space which was not a “*domestic drive*”.

SPH has stated to the ExA that drives would not ever be allowed to be blocked. Does SPH consider jamming the entrance of someone’s drive with cars and vans to be a blockage? We would argue that whilst the traffic is blocked along the road and squeezed into the nearest enclave no one can exit their drives, *this is a blockage*. No land has been set aside to create additional passing spaces to prevent this dual usage of peoples’ drives and residents’ parking spaces.

These sorts of dilemmas and the answer to whether this road is likely to be jammed for considerable periods of the day could be answered by school children. We don't think we need AECOM as they have been too reluctant to provide any useful evidence so far just in case they bring to the ExA's attention how bonkers their client's request really is.

It would be simple to model the road dynamics during the predicted construction phases using the baseflow counts and the estimated construction traffic flows using a map of the road and its very limited number of passing spaces (there is only 1 designated passing space from the Groeslon cross road to the first major uphill bend). Putting together hourly flows of HGVs, cars, animals, walkers, cyclists, terrified horses, and travel times between viable passing spaces would provide the developer and Highways department with a statistical analysis of the probability of gridlock, which would be substantial and hugely disruptive to residents and construction traffic alike.

With decisions regarding the main access route to Q1 residing outside the DCO we currently are left in a vacuum of uncertainty as to how we can access and live in homes during the 4 -6 year construction phase.

SPH should not be allowed to evade a cap on HGV at this stage in the proceedings. How can the examiner be asked to make a sound judgement when details such as the penstock night time construction noise and daytime slate dumping above the village remains inadequately modelled.

We feel that SPH has manipulated this planning application (initially submitting 49.9 MW application to fly under the Welsh Government's radar etc.) so that the ExA is being asked to make a huge a leap of faith in granting permission without having the opportunity to have these fundamental safeguards in place? We strongly suggest this is a leap too far!

Without wanting to sound disrespectful to the local council, residents are in the dark as to what level of nuisance (traffic noise, noxious air quality, road intimidation) would be considered critical enough for GC to intervene and require the developer to modify their activities. Is there a regulatory body less tied up in this project than our council that could act as an independent mediator should the developer's and residents interests be at odds?

For example, we can assure you that the noise of straining engines from heavily loaded construction traffic will interrupt thought processes and sleep patterns in many of the houses adjacent to the road making daily life miserable. If the council is being guided by AECOM and has already approved the flawed noise monitoring conducted "during" the SPH pilot study (remember SPH *accidentally* forgot install + took away equipment: before/after their main construction traffic used the lane), are we ever going to get noise caps that are meaningful and fair outcome for both parties?

Uncertainty over traffic volumes and management is bringing so much worry to many of the residents particularly the elderly and particularly those who have recently relied on the emergency services. Delays such as those envisaged for years to come if the DCO is granted could have cost them their lives. These and other members of the community have limited options to relocate if daily and nightly disturbances are impacting on their mental and physical health.

We hope the ExA may also be able to see the impracticalities of SPH “harmoniously sharing” Fford Cefn Du with other road users during the day. Knowing now that the plan to construct the penstock has changed from that of starting at Q6 and tunnelling upwards, to starting at Q1 and drilling and blasting downwards, we feel now more than ever the scheme should not be granted planning consent.

If this is not possible and this tranquil lane is to be turned into an industrial limb of a noisy construction site, residents situated within cm’s of the lane and particularly above the cattle grid (where the impact has been deemed even by SPH to be highly disruptive), again request the option of having alternative accommodation paid for them during the duration of the penstock construction phase. Although this request has to date been ignored by SPH, we believe asking for people to put their quality of life on hold for 4-(more likely 6) years is ridiculous. The planning process 2012 -2015, itself has already created years of worry for residents why should a whole decade of residents’ lives be overshadowed by one entrepreneur’s quest for profit?

Penstock to be constructed from Waunfawr side: Major Negative Impact on our Community

At our most recent “emergency residents meeting”, much of the discussion focused around the impact the decision SPH has recently made to drill and blast from the Q1 side of the mountain would have on the village.

The main impacts being in terms of:

- 1 Night time construction noise affecting Waunfawr and surrounding villages/hills
- 2 Night time traffic using Fford Cefn Du
- 3 Much greater volume of construction traffic at all times

In respect to the first point: The acoustics of this mountain location are complex. On still days sound travels far and bounces off proximal hills. When the cloud base is low sound can be reflected to the village below.

Residents in the Hafod Oleu dwellings above the cattle grid have informed SPH in previous submissions, that on relatively still days, they are able to hear motor cross bikes in the forestry section above Waunfawr. This is where their slate heaps are proposed to be located. Although SPH have without further investigation disputed this, the fact remains that sound does travel from vicinity of Q1 to these houses and down into the village. This has been a worry for the Waunfawr campsite which is located over directly beneath the land set aside as the SPH slate dump.

We query the strange AECOM noise modelling results provided in the early ES. It seems they have not attempted to predict the magnitude of clanging their huge vehicles will make scraping up thousands of tonnes of slate and transporting to their designated dump site which looms over the village. We have not seen any assessment of the likely noise from generators or pollution from the “forced air” ventilation, batching plants etc would make at night. We doubt these would be quiet. Would it not be more sensible to site these facilities at the Q6 end and tunnel from below thus buffering some of the noise by vegetation and surrounding slate heaps?

We can only plead to the ExA that these proposed night time activities are correctly assessed in the accompanying ES. If there is to be tunnelling at the Q1 end of the penstock it seems imperative to avoid/tightly control this type of noise pollution insisting on a complete ban on moving the slate excavated from the penstock onto the “Waunfawr tip” between the hours of 7pm-7 am. Could this please be factored into the DCO?

In respect to the second point: The general consensus reached at our local meeting was that it seems exceptionally unlikely that the developer would be able to effectively isolate and monitor the movement of its large team of workers stationed at their camp next to the top of Cefn Du during the night.

Are SPH/Gwynedd council really going to enforce a restriction on the use of Fford Cefn Du during the night? The Highways department pointed out that it is a public road and anyone can use it so where do we all stand? If the construction workers miraculously abide by the rules can the same be said for the canteen and facility support staff who are likely to work shifts?

It seems unrealistic that a night time tunnelling team would not need to use the main access route outside the nominal construction hours of 7-19. Construction related night time traffic would be a huge source of annoyance to those located along the access route. The intrusiveness magnified by the background tranquillity of this setting. This, augmented by the risks of road-related injury, poses a game changing threat to residents ability to live along this road. Use of this road will significantly interrupt peoples nightly sleep and, over such a protracted period, their ability to function. If development is allowed to go ahead alternative accommodation should be offered by the developer.

At the moment the wording within the ES and DCO appears to only constrict the movement of the HGVs to “Q1” during the hours of 8.30-4.30pm. Considering that ~50% of the HGV traffic is catering for the penstock it seems essential that there is no clause that allows these vehicles to access the road outside the 8.30-4.30pm window stated for Q1. More specifically in the DCO should it not be stated that construction traffic **is not allowed** to access the penstock part of the site after 7 pm and before 7 am.

We are grateful that the ExA has re-emphasised the possible merit of using CCTV monitoring to control the traffic and document any violations. This would be very applicable to vehicles at night when there may not be the man power available to log in and out traffic movements to the penstock. We believe this is the **only accountable** means of accurately protecting residents from traffic flow violation and reducing construction traffics temptation to speed.

In this final section we want to share our impressions from the recent SPH meeting held in Caethro on 29 June 2016 and how we feel in some instances even more worried by the plans presented.

Summary of the highlights of the exhibition:

As always residents took the opportunity to explain to the AECOM team members (a new set of faces sent on behalf of SPH who only sent their most recent recruit to field questions) that Cefn Du is

so important for the villagers and tourists, currently hosting fabulous walks and rides, along with uninterrupted views and quiet space and hence the primary reason for many to choose to locate here. However, to our annoyance they continue to fail to understand that the lane leading to Chwarel Fawr (Q1 in SPH terminology) is all part of the experience, be it driven, walked, cycled or ridden. The village does not want this to be ruined particularly by a group of consultants who have never prior to this meeting set eyes on the actual road.

Our dismay over AECOM's proposals to carry out "road improvements" only deepened once we saw the illustrations they had on display. Admittedly their plans were still clearly at a very elementary desktop design stage, disjunct from any physical reality of Fford Cefn Du. At this level of detail with major components such as electrics, and water mains yet to be considered we think it is impossible for AECOM to prove that this road is still a viable option for the heavy construction traffic. It was equally clear that the access road would remain as a concrete monstrosity for decades to come, should it be constructed.

A list of the odd details we were treated to have been listed below.

- At the consultation: no images/plans for passing spaces below the cattle grid. There are huge stretches of the road where vehicles cannot pass each other. SPH claims that drives will not under any circumstance be blocked. Residents currently use each other's drives as the only means of pulling off the road. This is acceptable with the current, low and dispersed traffic flow, however it is completely impractical for the intended traffic numbers and expected vehicle sizes.
- From the blind bend in the upper reaches of Fford Cefn Du, down to the cross-roads and beyond, (~1 km) there is only one designated passing space. That's one very tight squeeze.
- Even AECOM have their doubts that a "harmonious" road share could be established. A number of residents were informed that the company had considered the concept of asking residents to ring up the developer to check if it was convenient for them to exit their drives. Residents have expressed worry that this line may get a little busy when everyone wants to leave for work in the morning? This bizarre suggestion surely highlights the real possibility that residents will end up trapped in their own properties waiting for permission or good will of workers to use the only road that services their homes. How long before patiences fray?
- There was no information as to where the electric and water pipes for Q1 and the penstock would be sited. In past meetings SPH had mentioned that these may remain above ground during the construction phase. This in our view would pose a major physical barrier to those entering and exiting the road along the common. It would be a barrier for the free movement of pedestrians horse riders and sheep. A major disincentive to recreational users to ever use this cherished route.
- With adverse weather conditions common we can only hope that the pipes will be sufficiently insulated and that any sharing of the villages' electricity network would not trigger outages as many residents rely on consistent supplies to operate their businesses and homes.
- AECOM even suggested that they would need to obliterate many of the verges which offer some degree of refuge to walkers and riders. Instead these would make way for new

industrial-grade open, cutting right back to residents' stone walls (many of which are prone to collapse). It was pointed out to ACECOM that this would alter the appearance of the road and without pavements and scalable banks, force pedestrians/animals into closer contact with HGVs and other vehicles. Having been told that the only reason for widening the road to > 4 m above the cattle grid was to take account for "user error" many would now find the prospect of sharing 2.5-3 m wide stretches of road, void of banks these same less accurate drivers daunting.

- Vastly increasing the road surface area is likely to exacerbate the current flooding problems already suffered by certain properties along the road and bring greater volumes of water towards the main village. No land appeared to have been set aside to slow the excess water on exiting this part of the village, a requirement for most modern developments we are expertly informed.
- AECOM seem none the wiser as to which farmers have been approached and which fields may have been set aside for a temporary carpark.
- The open industrial drains proposed in the figures are not animal friendly. A number of riding stables and private livery yards utilise this road extensively and would find these types of drains impossible to safely cross on horseback. If these were to be implemented along the Cefn Du common, especially in conjunction with above ground cable/pipes, this would hinder the ability of riders to get off the road onto the common to allow vehicles to pass. Instead, sheep, dogs and horses would be funnelled along large sections of the road causing considerable delay to passing traffic.
- Residents were told that their walls will be taken down and re-built irrespective of their wishes.
- Residents were repeatedly informed that those who are in charge of designing the road do not need to really consider its functionality as this is someone else's responsibility. They seemed oblivious to the number of vehicles which were likely to be expected to use it or their dimensions. The team sent to explain the design admitted they had not seen the road before.

Summary:

The Waunfawr community maintains that this scheme will have an unnecessary, unwanted and hugely negative impact on the village. This is true for both the construction phase, and post construction legacy; years of nuisance and danger to those living adjacent to Fford Cefn Du as well as recreational users of this road and the mountain itself, followed by the permanent SPH inflicted 21C industrial scar stretching from the village to Cefn Du. It has hopefully become clear from our past submissions and responses to the recent SPH "consultation" that this road is a highly valued asset to our village in its present state. There are no benefits to any residents or other non-industrial users of having the road "improved" to industrial specifications. Despite AECOM redesigning the road, it remains an unsuitable route for construction traffic wishing to access Q1 because of the length, narrowness, traffic volume and numbers of residents with no other means of accessing their homes. We are thus adamant that an alternative route from Q6 to Q1 is the only viable and the only environmentally sensible option if this scheme eventually gets approval. However, due to the multitude of problems it would seem much more appropriate to reject the current application and

invite a re-submission of a more well thought out proposal that adequately considers access, nuisance and environmental concerns.

Best wishes

Dr Jane Huuse

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