

Comments for deadline 10 following Applicant's responses to my (Cherry Bartlett) submission for deadline 8.

The relevant Applicant responses are in Section 6 of document SPH_GREX_WED9_02 and, as the paragraphs are not numbered, my comments follow the same sections as in the document.

6.1 Relating to the "consultation" :

SPH refer me to Q 1.2(b) in SPH_GREX_WED7_01 in answer to my request for details of what the "consultation" showed. The response to Q1.2(b) mentions three or four issues that were raised at the "consultation" and states that there will be no changes to the CTMP as a result of the "consultation". SPH conveniently do not publish the full information collected at the "consultation" as it was probably not very flattering regarding their cavalier attitude to the residents of and visitors to Groeslon and Waunfawr. They are keeping the findings very close to their chest and we only see what they want us to see.

Relating to Mike ViKovitch's proposal for an alternative route to Q1:

I do not think SPH have properly justified their rejection of this and I can only surmise that there is something underlying their insistence on using Ffordd Cefyn Du that has not yet been revealed.

6.2 Relating to the poor information displayed in doc SPH_GREX_WED3_03

SPH state that the drawings would not be finalised until after the "consultation" , but , by their own admission (at the open hearing), the "consultation wasn't going to lead to any changes in the CTMP, so why couldn't the residents receive plans that showed their properties and utilities etc?

6.3 Relating to a Road Safety Audit for the s278

SPH agree that one is required. They point out that AECOM is separate to SPH. I accept that, but AECOM are not separate from the design of the changes proposed for Ffordd Cefyn Du. According to TMS based at Warwick University:

"Road Safety Auditing is a specialist process that must be carried out independently of design and construction work. Safety Audits are intended to ensure that operational road safety experience is applied during the design and construction process in order that the number and severity of accidents is kept to a minimum"

I sincerely hope that AECOM do not carry out the audit. If they do then it cannot be described as independent and should not be considered as part of the s278 process.

According to TMS:

"Road Safety Audit is a systematic process for checking the road safety implications of highway improvements and new road schemes. The sole objective of the process is to minimise future road accident occurrence and severity once the scheme has been built and the road comes into use.

The auditor needs to take into account all road users, particularly vulnerable users such as pedestrians and pedal cyclists.”

The proposals for Ffordd Cefyn Du pose many potential accident scenarios for vulnerable road users and these need to be thoroughly audited and examined.

6.3 Relating to the dangers created by the lack of passing places below the cattle grid

SPH state that the HGVs will not travel in convoys, so why did they say they would at the “consultation”? SPH have made no comment about what other traffic will be using the road to access Q1 and what, if any, rules will apply to them. It is important to be clear about all the extra traffic that will be using Ffordd Cefyn Du. SPH have never clarified as to how vehicles are going to pass other road users below the cattle grid.

6.4 Relating to drilling at night

SPH insistent that this will not take place. What recourse will residents have if it does?

6.5, 6.6, 6.7 Relating to pollution imposed on residents as a result of the traffic using the proposed route

SPH have provided information about National Air Quality Standards, but have provided no reply regarding the effect on residents and road users

6.8 Relating to the future of pumped storage

SPH do not agree that the lives and livelihoods of some residents of Groeslon and Waunfawr will be ruined by their project and that the mitigation they propose will make everything alright. How wrong they are.

SPH point to two documents *Towards a smart energy system (2016)* and *Smart Power (2016)* to justify their faith in the future of pumped storage. Having read both documents I see only that pumped storage was “... *built several decades ago under a very different system ...*” and that the authors are enthusiastic about new energy storage methods. The type of energy storage the authors are looking to utilises much newer storage systems such as battery, compressed air and supercapacitors. One document heralds the reduction in the cost of battery storage “*The cost of lithium ion batteries has decreased from more than \$3000/kwh in 1990 to less than \$200/kwh today*”. In neither document did I see a call for additional pumped storage. The authors want to avoid costly cabling such as that proposed by SPH from Glyn Rhonwy to Pentir, and look at ways that stored power can be located so that it can be flexible and enable users to store some energy themselves and that energy currently generated from renewable sources such as wind and sun can be stored and not wasted..

I am grateful to SPH for alerting me to these documents as I believe that they clearly show that pumped hydro on the scale proposed by SPH will have no place in the

energy systems envisaged in the very near future and particularly not in another 5 or six years, when this project might be ready. New technologies will provide much better methods of energy storage in the UK.

I urge the ExA to recommend that the DCO **not** be granted and, if that is not possible, to ensure that the residents and visitors to Groeslon and Waunfawr are not subjected to the nightmare that the proposed route to Q1 portends.