

Orders Branch,
Transport,
Welsh Government,
Cathays Park,
Cardiff CF10 3NQ

Dear Sir/ Madam

**Published Draft Orders, Environmental Statement &
Appropriate Assessment Statement: A55 J16/16A (Dwygyfylchi)
6 Weeks Orders Objection Period**

This letter contains my representations on the above proposals. The scheme proposed at Dwygyfylchi has massive impact on the village & villagers. My objections & suggestions for improvement for the benefit of current & future generations are presented in good faith, & in the best interests of the villagers who elected me to represent them as County Cllr. I trust, therefore, that my constructive feedback is listened to & acted upon.

1. Published Documents & Public Communication:

I am concerned that poor public engagement & liaison in respect of the deposit documents referenced above render the process - which ended on 7th May 2021 - unsound & invalid.

I raised these concerns with Welsh Govt by email on 22nd April 2021. Since late Dec 2020, I had been pressing for a meeting & copy of the Project Communications Plan. I understood that Covid-19 would make public engagement more difficult at the next stage, & that robust alternative solutions to face to face engagement would need careful thought, planning & delivery.

WG/ Contractors response, in fairness, was speedy. I met with the Project Team along with the Penmaenmawr County Cllr on Monday 26th April 2021. At that meeting, I detailed concerns about lack of meaningful signposting & engagement with the public. My concerns were reinforced when the Public Liaison Officer confirmed that, in the first 4+ weeks of deposit, there had been only 5 requests to visit Maen Alaw to "see" the deposit documents. This was no surprise, given there were no signposting documents on village noticeboards or even outside the Maen Alaw Deposit Centre itself. And at the Deposit Centre outside the village, there was no exhibition of documents, display of maps or storyboards to facilitate visitor understanding. Villagers were expected to open boxes & discover for themselves their contents & their meaning. *An unrealistic task without a doubt.*

The Project team agreed to display notices on local noticeboards by Friday 30th April, a week before the representation deadline. Given the lateness in the process & their design, I doubt they made any significant increase in the number of villagers requesting access to the deposit documents at Maen Alaw.

At the 26th April meeting, it was suggested online meetings were arranged for villagers. 3 Public Webinars were arranged for Wednesday 5th May, 2 days before the closure date for representations.

The Project Team felt unable to deliver letters to all villagers or to erect storyboards

within the village outlining the proposed scheme. The online meeting was restricted to an hour in total, leaving 40+ questions unanswered with the promise that answers would be published online. 3 hours before the first webinar, I discovered that only villagers with a Microsoft TEAMS account – business software - would be able to join the webinar. I advised the Project Team, but nothing could be done.

As a result, I am aware that many villagers were unable to gain access to the webinar & complaints have been submitted.

I do understand that Covid-19 made public engagement more difficult, but relying on online documentation, not accessible to those not digitally enabled or simply unaware of the existence of the deposit documents, is tantamount to excluding many villagers, given the demographics of Capelulo Ward.

Depositing boxes of daunting documents in a location outside the village most affected, & without meaningful, indeed any physical signposting is simply not acceptable. How could villagers be reasonably expected to know how to make an appointment to view these documents when it was not published on village noticeboards? Request for an extension to the 6 weeks objection period to enable meaningful engagement with villagers & reasonable time for informed objections to be submitted, was restricted to 48 hours, with the deadline for receipt of representations extended to Sunday 9th May. In the circumstances outlined above, I don't think this was reasonable or made significant difference to facilitating public engagement.

I also met with the Project Team/ Contractors on 27th April, to seek clarification of my understanding of the “daunting” box of documents I had received & to raise personal concerns/ make suggestions about the proposed scheme (summarised below) & its impact on Dwygyfylchi/ Capelulo Villagers.

2. **Objections, suggestions & comments**

Scheme Objective 2: Improve road safety on the A55 from junction 14 to junction 16A

Scheme Objective 7: Take reasonable steps to build healthier communities & better environments

Scheme Objective 9: Minimise technical departures from standards

- **Public Land Purchase & Exchange: Objective 7**

The village's only usable public space is its football field. I object to the proposed exchange, which is neither fair nor proportionate to the proposed % loss of village football field/ multigenerational recreational space.

The exchange triangle – an awkward & limited value space - offered does not compensate for loss, or offer opportunity for replacement amenity value.

This is the only safe multi use public open space in the entire village. Open space is a significant pre-existing deficit in the village according to CCBC Stats.

Below is a picture of the football field in use & clearly evidences the significant loss proposed:



There is a material loss of use & functionality with the land exchange proposed. How do children play football across 2 different fields? Why should the proposed relocated football field not be recognised as being *reduced in size* by this scheme of works? And, why should there not be proper compensation? The topography of the exchange land proposed renders limited use. It does not represent a fair “quid pro quo” given the loss of open space & the loss of footpath adjacent to & below the field. The footpath below gives safe & convenient access to the field. It means villagers are able to access the field from Ysguborwen Road & from the bottom of Maes y Llan.

Maes y Llan is a large ex council estate adjacent to the field along its western side. How do these villagers access the field without walking along the A55 link road when the footpath & bottom gate is removed? The A55 link road with its shared cycle path/ footpath does not compensate villagers or provide equivalence. In my next bullet point, I suggest a solution to this loss, & a better solution for access to Iron Bridge from the village.

It should be noted that the exchange proposed gives no long term guarantee of use as alternative open space for future generations, as the exchange is to be in the ownership of Cartrefi Conwy Housing Association. Cartrefi Conwy have been trying to develop housing on our public open space ever since CCBC transferred the ownership of the land to them, without condition & as a nil cost addition to a housing stock transfer arrangement in 2008.

Given that the proposed A55 Link Road will facilitate future housing development on the adjacent green fields, this will serve to strengthen Cartrefi Conwy’s ambition & resolve to build houses there. Why can Cartrefi Conwy not be financially compensated for compulsory purchase? And, why can’t villagers be compensated separately for lost Public Open Space?

Separating the two losses seems only sensible & reasonable.

- **Iron Bridge Access & Connectivity: Objective 7**

I object to the proposed new DDA compliant replacement bridge on the grounds that is not a like for like replacement in terms of safe access & connectivity from the village.

The bridge in place currently offers safe access to all from the safe footpath at the bottom of the football field. Safe access should be retained. And, safe

access to the beach & the cycle path should be retained during construction too. The access proposed via the A55 link road will mean old & young, families too, having to navigate safe access across the busy new 40mph link road.

No doubt, drivers will “struggle” to keep to the speed limit on this new road, meaning villagers of all ages & mobility will have to navigate speeding traffic coming off the A55 & from Penmaenmawr to access the A55. At the proposed crossing to Iron Bridge, the A55 link road travelling west has a large “kink” around the service station. This impacts on sight lines for traffic & pedestrians alike. The Project Team describe this location as an access hub. It seems to me to be a compromised location for such a purpose.

I strongly urge that the proposed new bridge be extended to span over the A55 link road. It could cross over Puffin Services Car Park & be accessed from the proposed compulsory purchase land behind the Gwel y Mor houses. Puffin Services Car Park is an eyesore to the village, & risk to village children too. It is not maintained, has no litter collection bins or litter pickup, & is frequented by long distance lorry drivers, some illegally parking overnight when there are no toilet facilities nearby. Whilst the Puffin Café remains closed, there are no toilet facilities at this car park. Human waste is frequently found in various locations & bottles of urine found scattered throughout the area & even on the beach.

This project scheme can & should provide shielding from these issues & concerns for villagers.

- **Glan yr Afon Road Jct 16a Impact: Objective 7**

Glan yr Afon Road is considered dangerous & difficult with current levels of traffic & current levels of use. It is dangerous for pedestrians & cyclists alike.

I object to the current scheme’s proposed interface with Glan yr Afon Road. I am concerned about the impact of increased traffic & the limited mitigations offered within the current scheme. I will deal with the traffic issue further in the Traffic Impact Modelling bullet point below. I genuinely believe that there are a number of issues with what’s planned for Glan yr Afon Road:

- * slip road down to A55 travelling east is short & inhibits sightlines to traffic on A55 traffic travelling a high speed (70mph) towards the 30mph section of A55 round the Penmaenbach headland; 30mph restriction needs to be moved to be well in advance of the entrance to the Sewage Works & hence in advance of where the new slip road joins the A55.

- * connection with the village is not safe as it will facilitate drivers’ ability to speed – a pre-existing issue – further along into this road towards the village, close to where there are other pre-existing traffic issues.

The local PCSO recently advised that Go-Safe Wales will not conduct speeding checks in this area due to the inherent dangers in this location.

- * planned improvement is not joined up, as the proposed road quickly becomes constricted & dangerous due to highway width, lack of footpath,

blind bends where no mitigation is offered or potentially possible.

- * a new 160m cycle path should be avoided within Glan yr Afon Road & new cycle path access to the A55 link road should be provided via the entrance to the new housing development across the field & join with the existing footpath (upgraded/ widened) to join up with the new A55 link road. Continuous & safe cycle path access to the A55 link road would be delivered & this would avoid aggravating the current issues on Glan yr Afon Road.
 - * we should avoid encouraging people to walk up/ down Glan yr Afon from St Gwynin's as there is only limited ability to walk safely.
 - * sheep are a real danger to themselves & motorists on this road at certain times of the year when farmers release sheep to the mountains to roam. The sheep have "learned" to come down to the village from the mountains & are an increasing risk to the resilience of the A55 at these times. The current cattle grid is not sheep proof. Sheep easily navigate their way across & are then able to wonder on to the A55. NWP/ NMWRTA will provide stats in this regard.
 - * There is no planned Gateway Feature proposed at Jct16a to signify to drivers that they are entering a small rural village & need to adjust their speed accordingly. A Gateway Feature should be provided to signpost/ promote Dwygyfylchi location within the Snowdonia National Park & its attractions.
 - * There is lack of clarity of who is currently responsible for maintenance of hedging & trees around the area. Consequently, the area often looks overgrown & unsightly, rather than welcoming & inviting as we locally call Dwygyfylchi ... #OurGreenVillage
- **Ysguborwen Road Impact: Objective 7**
 - * There is no planned Gateway Feature proposed at Jct16 to signify to drivers that they are entering a small rural village & need to adjust their speed accordingly. A Gateway Feature should be provided to signpost/ promote Dwygyfylchi location within the Snowdonia National Park & its attractions. A Gateway Feature for Dwygyfylchi at Jct16 is required to separate & distinguish the Village of Dwygyfylchi from the Town of Penmaenmawr. Dwygyfylchi is a historic village in its own right.
 - * There is a history of flooding in close proximity to where Ysguborwen Road is being altered for this project. The scheme plans should take account of this & resolve the issue within the proposed surface water drainage plans for the project. A joined up approach is sensible, given that CCBC would need to apply for Welsh Govt grant funding to resolve the outstanding surface water flooding issue there.
 - * There is lack of clarity of who is currently responsible for maintenance of hedging & trees around the area. Consequently, the area often looks overgrown & unsightly, rather than welcoming & inviting as we locally call Dwygyfylchi ... #OurGreenVillage.

* Sheep are an issue & A55 risk at the Ysguborwen Road junction too.
A sheep proof cattle grid needs to be installed in this location.

- **Traffic Impact Modelling & Traffic Mitigation Plan: Objective 7**

I object to the lack of soundness of the traffic modelling done to date.

I challenged this c18 months ago, but nothing seems to have changed.

The base data from 2017 is 4 years out of date, & the assumptions made do not seem realistic.

* Glan yr Afon Road will see significant increase in 2 way traffic. Significant numbers of villagers & others will use Glan yr Afon Road to access the A55 via the new Jct16a. It is counter intuitive to expect villagers to drive to the Jct16 end of the village to access the A55 via the link road, when they would have to drive past Glan yr Afon Road to do so. I have asked that this modelling be redone, & confirm that request in writing within this letter.

* Glan yr Afon Road has significant constraints which are problematic currently: sections have no footpaths, sections are so constrained that 2 way traffic is not possible; sections have 2 way traffic on blind bends, but buses cannot keep within the lane markings & so present to oncoming traffic in the oncoming traffic lane: near misses are a frequent occurrence.

* 20 mph should be installed across the village as part of the project.

This will comply with the planned direction of Welsh Govt.

In late 2019, I walked the village with Project Transport Contractors & CCBC Traffic Officers to share concerns about the scheme's impact on traffic on Sychnant Pass Road, Conwy Old Road, Cae Cyd Road, Treforris Road, Ysguborwen Road & Glan yr Afon Road. This walk around was to inform the Traffic Mitigation Plan to be designed. To date, this has not been disclosed to CCBC or to myself. 18 months later & at the Draft Orders Deposit Stage, this provides me with no assurance of a credible plan to address my concerns.

Surely, at this stage the Traffic Mitigation Plan should be a disclosed & published deposit document? How can villagers make objections or comment on an undisclosed plan?

- **Dangerous Exit from Puffin Services: Objectives 2 & 7 & 9**

Current access to & exit from Puffin Services is located on the west bound A55 carriage way between Jct16a & Jct16. As such, they should be in scope of Objective 2 of this project. They are both dangerous, the exit more so than the access. Both are too short.

The exit is really difficult in terms of access to the A55. HGVs & other smaller wagons are frequent users of the Puffin Services. Vehicles often have to force themselves on to the A55 as the short length of the slip round doesn't make filtering easy. Oncoming traffic have limited visibility of traffic exiting again due to the short length of the slip road.

Oncoming traffic will be travelling at consistently higher speed past the Puffin Services as there will no longer be signage, rumble stripping or the need to

slow down to approach Puffin Roundabout.

Only the access to Puffin Services is to be improved via a new slip road from Jct16a. I object to the fact that the exit issue is not being addressed within the scheme proposed. This is a significant omission & issue, & within the significant spend of this project, this exit should be addressed. It is curious that the Project has now been extended to cover Jct14, yet a significant & known safety issue between Jct16a & Jct16 is not in scope to be addressed.

- **A55 as a Green Tourist Route**

I would ask the project Team to consider the impact of the final design on the views across to the Carneddau Mountains & Snowdonia National Park from along this section of the A55. I am mindful of the recent alterations which have been made the Conwy side of Penmaenbach Tunnel to give further noise protection to the Gypsy Traveller Site adjacent to the A55. I am mindful too of the concreteness of the Colwyn Bay stretch of the A55 50mph stretch.

I am keen to protect the natural & open aspect of this stretch of A55 overlooking Dwygyfylchi & looking out from Dwygyfylchi. I wish for views to offer sensitive & positive “green” views to travellers & villagers alike.

- **Impact on Dwygyfylchi Village/ Villagers: Objective 7**

The proposed scheme has significant impact on the village & villagers throughout construction & in perpetuity:

- * Jct16a will be closed for 18 months/ construction site to be built at the entrance to the village & in place for c24 months/ A55 will be congested for 24 months & access on to the A55 will be problematic/ frequent standing traffic on A55 I expect/ Sychnant Pass & Conwy Old Road used as rat runs to bypass A55 delays & hold ups/ village bus service will be constricted/ access to the petrol station will necessitate travelling to Conwy & back/ village amenities affected/ loss of use of footpaths/ construction noise & fumes & inconvenience.
- * Houses blighted/ Football field reduced in size & functionality/ increased traffic through village/ increased fumes (emission testing results not disclosed) & noise from A55 despite mitigations proposed/ Glan yr Afon Road made more not less dangerous/ connectivity from A55 link road to village for pedestrians & cyclists not promoting realistic active travel .
- * Despite the scale & severity of this impact, community benefit/ payback is uncertain.

I look forward with optimism to the dialogue with the Project Team over the next few months about how my objections & suggestions can be resolved/ addressed. I am advised that any objections remaining will be tabled for discussion with the Planning Inspector at the Public Enquiry provisionally scheduled for Sept 2021.

Yours faithfully,

Anne McCaffrey
County Councillor for Capelulo Ward