

Objections to the Planned A55 junction 15 scheme -

These objections are submitted by

Respondent ID: J15-R023 J16-R011

They are focused on the aspects of All Travellers and Nature Conservancy as described in **Document 1. A55 JUNCTIONS 14 AND 15 IMPROVEMENTS . ENVIRONMENTAL STATEMENT. Vol1 Assessment Chapters** and are related to the relevant Objectives of the scheme as stated in **Document 2) WELSH GOVERNMENT.A55 JUNCTIONS 14 AND 15 IMPROVEMENTS. OUTLINE STATEMENT JULY 2021.**

The numbers in brackets before the document title refer to copies of the documents provided where appropriate.

The objections are raised from the point of view of a local resident of Llanfairfechan.

Objection 1 .

Delays to traffic on the A55 caused by the roundabout at Junction15 are negligible compared to other places on this route and do not justify the expense and disruption to people and wildlife which will be caused by it's removal..

Doc.1) Chapter 1 Page5 .

The A55 junctions 15 and 16 are the only two roundabouts on Euroroute E22 and hence are a constraint to the smooth flow of traffic leading to increased journey times and poor journey time reliability. They also contribute to the incidence of stationary traffic backing up into the A55 Pen-y-Clip and Penmaenbach Tunnels, which in turn can be an increased safety hazard.

I cannot find any specific data relating to these delays and have asked Ramboll to show me where they can be found.

For 28 years I travelled daily to work on weekdays (excluding some of the school holidays) between Llanfairfechan and Old Colwyn and Craig y Don near Llandudno, leaving at between 8am-8.30 and returning around 6.30pm. While in the last decade there may have been delays getting out of the village onto the A55 (at both Junctions 14 and 15) I have never experienced any delays on the A55 caused by the roundabout. The only occasions that I have ever experienced delays on this stretch of road have been during the reduction of the carriageway to a single lane and the provision of traffic lights for tunnel maintenance and other road works.

Very few vehicles turn into Llanfairfechan from the Eastbound carriageway . The vast majority use Junction 14 to enter the village - this means that traffic rarely has to stop at the roundabout at Junction 15 and traffic flow may be slowed but it is not delayed or impeded as much as the 50mph limit in Colwyn Bay between Junctions 21 and 23 or the 50mph limit at Queensferry or the Britannia Bridge crossing to Anglesey,all places where there are regular long tailbacks I therefore believe that while the aim of **OBJ3. *Improve journey times and journey time reliability on the A55 from Junction 14 to Junction 16A .***

(see *Doc.2.. p.26*) may be achieved by removing the necessity to slow down to negotiate the roundabout between Junctions 14 to 16A, it's effects on total journey times along the A55 will be negligible and not justifiable in terms of the expected 2 year construction period , the cost financially and in relation to the disruption caused , and the adverse environmental impact.

Objection 2.

The proposed slip roads would bring the A55 right into the village.

Although the noise from the road is a constant presence anywhere in Llanfairfechan- the road itself is only really visible from a few places - mostly high up and far removed from it. But as is stated in the

Doc 3) .ch 8. Environmental assessments para 4. P16

Overall, the Scheme would cause further urbanisation of the road corridor with additional man-made features such as the overbridge, viaduct, retaining walls and gantries detracting from the existing view.

Despite mitigation for new planting etc. nothing will be able to disguise the high concrete ramp and bridge to the overpass which will spoil this end of the village which is relatively peaceful and quiet.

Objection 3.

There is no significant 'severance' from the coast in Llanfairfechan (as stated in Objective 6) to be remedied and there is good provision for walkers and cyclists

Doc 2) p26 . States that *Objective 6* will

Reduce severance with coastal areas for the non-motorised users and enhance provision made for walkers and cyclists.

I understand that, during the public consultation and the collection of questionnaires , members of the public complained of a feeling of 'severance' from the coast by the presence of the A55. Perhaps this perception was not related specifically to Llanfairfechan because there is good access to the beach and coastal areas via Station Road, Shore Road East and the overbridge at Junction 14 which leads to the lane to Glan y Mor Elias. Having had to regularly try to cross Penmaemawr Road, before the A55 was built, with 'nose to tail' traffic and no pedestrian crossings or traffic lights, I would say access to the coast from the top of the village has been improved no end by being able to pass under the A55 and not having to 'take one's chances' with through traffic from both directions.

The claim of Objective 6 to 'reduce severance' with the coast is in my opinion not valid.

Objection 4

a)The 'enhanced provision for walkers and cyclists' in the shape of a shared cycle/footpath in reality may not be an enhancement or an improvement but a potential hazard for both types of users of the path and may discourage people from walking or cycling.

b)Crucially I do not believe these 'improvements' will be offered unless the scheme goes ahead.

Doc.2) Chapter8 Environmental Effects of the Proposed Improvements. P.37

8.32. New public open space and Active Travel routes would be provided to enhance connectivity and access to community facilities. The Scheme includes improved cycleway/footway along Penmaenmawr Road and the provision of bus laybys close to Pant-y-Rhedyn school that would assist with traffic flows and pedestrian safety. The Scheme would have an adverse effect on some existing private assets and development land, but would have a minor adverse effect on farmland.

There is already good provision made for walkers and cyclists in Llanfairfechan. The plans for this scheme include the provision of a shared cycle-way and footpath along the north side of Penmaenmawr Road.

There is published evidence to suggest that shared footpath and cycle ways, unless they are carefully planned with extensive research into their use by qualified designers, are likely to cause more collisions with cyclists and pedestrians and more user stress than separate provision. See **Doc. 4) Site examination P7**

This document also recommends that 'improvement's are not made without prior proof of demand

See Doc 4 P 9 para.3.3 Routes linking existing and proposed trip attractors/generators should offer good conditions for cycling. In general, improved provision should only be made where there is (or will be) a demand for cycle trips and where existing conditions are unsuitable, not simply because an opportunity exists to do so.

Doc 5) <https://www.livingstreets.org.uk/media/1864/sharing-the-space-report.pdf> - A report from research done in 4 different areas of London where shared pedestrian and cycleways had been trialed. March 2016. Highlights the dangers of increased collision and stress caused by high volumes of pedestrians and cyclists at certain times of day. See **Doc5 Sharing the Space . page 2 and 3 highlighted passages.**

This length of Penmaenmawr Road is used by children who walk to Ysgol Pant yr Rhedyn school from other parts of the village. The children start attending this school at age 7.

The children who currently walk to school (and many of them do) could be at risk from cyclists. I am assuming that the shared cycle/footpath would have a demarking line and symbols to show which part is to be used but children are not always able to focus on these things when chatting with their friends and should not have to have yet another situation in their lives when they are having to be constantly vigilant about dangers, or supervised by adults to protect them from danger. I am a regular walker and find shared paths are not relaxing or pleasant to walk along. Many cyclists cycle at high speeds and do not always have a bell to let you know they are coming. Both my children attended Pant y Rhedyn school and one of their 'rites of passage' and a thing that makes Llanfairfechan such a good and healthy place to live , is the ability of older children to walk (or travel by scooter) along the pavement on Penmaenmawr Road without adult supervision. The Pelican crossing at the crossroads and the Crossing Patrol Officer opposite the

school provide safe supervision when crossing the road and allow our children some sense of independence and autonomy in a world which is increasingly devoid of 'safe-spaces' for them . It would be a great shame to inflict another level of stress on our children, parents and other users in the name of 'improvements'

The cycle and pedestrian way planned for the south side of Penmaenmawr Road runs alongside the bus stop opposite the surgery. Will cyclists be aware of people alighting from the bus and how will bus passengers alighting be protected from cyclists passing at speed? This arrangement , in my opinion , would make the daily walk (or scoot) to school hazardous and unpleasant for all concerned and would possibly discourage people from walking along this route . These hazards are in contradiction with **2)** . p.26

OBJ 7) Contribute towards building healthier communities and better environments

The encouragement of increased walking and cycling opportunities is a corner stone of Welsh Government policy.

Objection 5.

Objective 4 of improving resilience for this section of the A55 is not achievable.

OBJ 4) Improve resilience on the A55 for strategic and local traffic

Because of the geographical location of Llanfairfechan there are no alternative routes to the A55 for vehicles in and out of the village.

Doc 3) p17. Chapter 2 Description of the scheme. Context 2.2.4. Junction 15 and Junction 14 at Madryn approximately 2.8km to the west, are the only vehicular access points to the town of Llanfairfechan and surrounding area. Access is limited due primarily to the mountainous terrain of Snowdonia that rises steeply to the south of the A55 and the town, meaning that there are no alternative routes in and out of the town other than via the A55.

Objection 6

Objectives 7 and 8 are not addressed by the proposed scheme and the use of the term 'Active Travel ' is incorrect.

OBJ 7) Contribute towards building healthier communities and better environments

Doc.2) p26 . Chapter6 Description of Scheme P.29

6.10. The scheme incorporates a range of active travel measures to enhance the provision made for walkers and cyclists. It is anticipated that these would improve the quality and connectivity of the existing walking and cycling routes.

It is clearly stated in the **Doc.3). All Travellers . p20 para2**

The Active Travel (Wales) Act 2013 refers to walking or cycling as an alternative to motorised transport for the purpose of making regular and daily journeys. An active travel is a journey made to or from a workplace or educational establishment or to access other services or facilities. This covers short distance commuting such as travel to school, shops or leisure facilities and has to be suitable for everyday use. It does not cover routes or sections of routes that are just used for leisure or recreational purposes.

.As well-provided as Llanfairfechan is for shops and other amenities. It has no senior school, no large supermarkets where many people need to shop, no swimming pool, no cinema , theatre etc.no dentists, opticians or other services residents may use. Because of the distances

to the nearest towns and opportunities for work ,most of the working population of Llanfairfechan work at least 9 miles from their homes. None of these places are accessible from Llanfairfechan by cycling except by the most enthusiastic and fit cyclists and are not practically accessible by pedestrians because of the geographical position of Llanfairfechan.

Improvements to 'active travel' will only ever benefit tourists and people's local leisure activities- which are already well used.

Instead the Welsh Government have clearly stated that

'we need to change the way we travel. We need fewer cars on our roads, and more people using public transport, walking or cycling.'

Doc.6). Intro. P3 para4.

Objective 8 of this scheme claims to *Increase opportunities to provide integrated transport*

- Unfortunately this scheme will remove 2 bus stops which will limit the access to local and school buses for the residents of Pendalar and there is no provision to replace them nearer to the current housing than outside Pant y Rhedyn school (several 100 metres) This will adversely affect people with mobility difficulties , the elderly and people carrying heavy bags and people with small children - so far from encouraging integrated transport this scheme seems to be limiting it.

There is no provision in this scheme to improve access and suitability for rail travel.

Llanfairfechan is fortunate to have a station but it is massively underused as a resource. - given that the Welsh Government are committed to promote alternative methods of travel and reduce reliance on cars - this scheme seems to be in direct contradiction to the commitment. The answer for a sustainable Llanfairfechan must lie in the provision of a well regulated, regular and convenient public transport service which would enable people to access places of work , shops and other amenities without having to use a car. This 'improvement ' scheme does nothing to promote any aspect of this and in aiming to reduce travel times on the A55 , by however a small margin, seems to be promoting the use of car in direct contradiction of the Government's stated aims

Conclusion

It is my belief that the planned removal of the roundabout at Junction 15 of the A55 fails to fulfil at least 5 of the stated 8 Objectives and only partially fulfils another. It is actively at odds with current transport policy to reduce car use and promote public transport and active travel. Where benefits to the village may accrue from mitigation they can in no way justify the expense, disruption and permanent loss of habitat and character to the part of the village concerned.

Nature Conservation

Objection7. The scheme would involve destruction of a natural habitat that has taken decades to develop.

This destruction is in direct opposition to Welsh Government policy as set out in the Wales environment act. And the future Generations Act Wales.

Doc. 9) P3 .para 2.

- Part 1: Sustainable management of natural resources – enables Wales' resources to be managed in a more proactive, sustainable and joined-up way. It also helps to tackle the challenges we face and is focused on the opportunities our resources provide.
- **Doc.11. The Future Generations Act Wales 2015.** The goal of a resilient Wales is to reverse the decline of our biodiverse natural environment, to develop better awareness of our impacts as individuals and organisations, to ensure we are ecologically resilient, with healthy ecosystems, and to support community well-being. *P1 of copy - highlighted.*

Objection7. The scheme is likely to affect the flora and fauna of a much wider area than that directly affected by the scheme.

The surveys carried out for the Environmental Statement relating to Nature Conservation are very detailed but in my opinion make some unsubstantiated assumptions. Heavy reliance is placed on the effects of the mitigation actions to overcome the negative effects of destroying wildlife habitats and the noise, light and potential pollution caused by dust and runoff from the road works.

Doc 1 Chapter 8. P205. 8.5.7. Ancient semi-natural woodland.

There are 36 Ancient Semi-natural woodland sites, including restored ancient woodland and plantation on Ancient woodland within 2km of survey area. The closest of which are located approx. 200mtrs from the scheme, to the south of Penmaen Park. None of these would be affected by the scheme's proposals.

Animals and plants which rely on movement along corridors will be very unlikely to withstand 2 years of major disruption to part of their habitat. The natural world relies on interconnection between wide areas and there can be no surety that animals and plants outside the planned area of the scheme will not be affected however carefully the works are carried out. Even though strategies are planned to minimise dust settlement, water run off etc. this can be exacerbated by storms and other predictable and unpredictable weather conditions. I am not convinced that the management of this scheme can categorically state that even sites well away from the actual site of works will not be affected by the excavations, noise and inevitable pollution. Many of the animals listed in this statement have wide ranging patterns of behaviour and may not tolerate part of their habitat being disrupted in this way.

The Environmental Statement rightly pays attention to protected species and highlights the international importance of the foraging grounds of the Oyster Catcher both on the Lavan Sands adjacent to the planned construction site and in Penmaen Park and acknowledges that the disruption caused is likely to deter groups of Oyster Catchers from using this field to forage at high tide. There is no guarantee that foraging oystercatchers would return after 2 years of disruption, noise, pollution from construction, loss of parkland and the erection of noise barriers and the slip roads.

Impacts on the flora and fauna of the scheme are also directly affected by **cumulative effects of loss of habitat in other areas** as described in **Doc1)** Chapter 8. P268

Assessment of Cumulative Effects 8.10.1 Cumulative effects result from multiple actions on receptors and resources over time and are generally additive or interactive (synergistic) in nature.

Cumulative effects can also be considered as: ‘...impacts resulting from incremental changes caused by other past, present or reasonably foreseeable actions

Further descriptions of cumulative effects and interrelated effects are described in

p268 8.10.2 Two principal types of cumulative effects are considered: interrelationships between effects generated by the Scheme, and the addition or interaction of effects generated by one or more other schemes in combination with the project being assessed.

And page 272, 8.10.9 Inter-relationships refer to the combined effect on individual (or groups of) receptors or resources from more than one source or type of environmental effect (e.g. noise, Land-take, air quality, hydrology) for example, a small area of habitat loss coupled with increased noise disturbance in remaining habitat could together reduce the foraging or refuge habitat available to a species sufficiently to reduce the local population.

P.268 8.10.3 When considering in-combination effects in the assessments , the potential effects of the measure on the feature is the key consideration. A plan or project could have an effect on water quality which in isolation would not be a significant effect but in combination with other effects could be significant.

An important bat corridor in Llanfairfechan was severely disrupted during the summer of 2020 along the railway line West of Llanfairfechan Station by the felling of mature trees which provided a well established foraging corridor. Noctule bats were recorded as using this corridor as well as pipistrelles and lesser horseshoe bats. This should be taken into account when considering any further disruption to the bat population in Llanfairfechan. There is also a potential loss of a large proportion of Llanfairfechan’s trees due to ash die- back which is now established in the local tree population. Although ash trees are considered to be of low priority for roosting bats they provide important continuity of corridors for foraging and roosting. This must be considered when removing any existing wildlife habitats. These factors taken together with the EAs list of ‘in -combination’ and cumulative effects - which include *a) Land to the West of Penmaen Park; b) New build residential units at Fernbank, Llanfairfechan; c) Mineral permission Penmaenmawr Quarry; d) Abergwyngregyn to Tair Meibion A55 improvements; and e) A55 Junction 16 improvements. Doc (1) Chapter 8.8.7.50. P269*) would cause any further disruption to this environment to be highly irresponsible.

Objection 8. The loss of natural habitat would be irreversible and no mitigation can replace it.

This will lead to disruption and potential loss of priority species such as bats and hedgehogs as well as non-listed species which are vital for the survival of the local ecosystem for example the removal of hedges along the south side of Penmaenmawr Road as well as the well-established roadside planting along the A55 itself.

According to **Doc 1** Chapter 8 p.242 *8.7.81*

The present *Hedge Intact Species Poor*. *This Priority habitat will be lost and replaced with native/ornamental shrubs. Upon opening of the Scheme, this will be immature and may be susceptible to lack of water and pollution during the establishment phase which may lead to failure, as such, in the absence of mitigation, the effect is still considered to be a **Major Adverse Effect**. Within the design year, this habitat would have established, and as such, in the absence of mitigation is considered to be **Slight Adverse effect**.*

Doc.1 Chapter 8 p.211 8.5.40 also states that :- *The areas of mixed plantation woodland support foraging and commuting bats*

Doc.1 Chapter 8 p212 8.5.43

*the commuting and foraging routes associated with Scheme were classified as being of **local importance** for common and soprano pipistrelles, natterers, Daubentons, brown long-eared bat and the lesser horseshoe bat and of **Medium - Regional** importance for Noctule and whiskered/Brandts. **Based on this classification system, noctule species are categorised as rare in Wales.***

Doc 7) copy of the woodland trust website.states that :-

. Noctule bats favour trees with rot and woodpecker holes. Being the biggest bats in Britain, they're able to fly 10km away from their roosts.

Which suggests that removal of wildlife corridors could affect wildlife from several km. from the site of this scheme.

*While the noctule bat is widespread in the UK, it is thought the population may have declined following the introduction of intensive farming methods. **It is also vulnerable to the loss of mature trees, which it uses as nesting and hibernation sites. The noctule bat is classified as a priority species in the UK Biodiversity Action Plan. It is also protected by law in the UK under the Wildlife and Countryside Act 1981.***

It would seem that removal of the hedgerows and some mature trees in Penmaen park, (**Doc1**(Chapter 8. See p238. 8.7.40) plus the noise and disruption of construction could have an extremely adverse effect on a number of bat species that were noted in the surveys- with no guarantee that any of them would return in the decades it would take to regrow sufficient cover for their needs.

Another factor in the probable disturbance and possible reduction in the bat population is the disruption from lighting along the slip roads which prevent bats from foraging when most insects are around and therefore have the potential to severely limit the population due to lack of food. Bats are discouraged from leaving their roosts when their habitat is lit at night and also makes them visible to birds of prey.

See **document 10**. Bat conservation Trust/about bats/lighting.

. While the protection of species under threat is vital it is also important not to disturb or remove the habitat of any wildlife that seems to be numerous or commonplace. In 6 decades (also about the length of time it takes to replace a mature tree) many common species of plants and animals have become threatened because of the loss of their habitat or the loss of habitat for their food species. Many of these species are the most loved by the local population e.g. hedgehogs.

Doc1 *Twenty-five records for hedgehog *Erinaceus europaeus* occurring within 2.0 km (of the scheme site) in the last ten years were highlighted during the desk study. The closest record is within 0 m both of which are road casualties. The nearest live record was 20m from the Scheme, with two noted foraging within a garden.*

It is common knowledge that the hedgehog population has suffered a serious and continuing decline since the 1970s - **document 8. Copy of BBC Cymru website . Nature/Outdoors/Hedgehogs** *The most recent data from the Mammals Trust UK (MTUK) has revealed that the number of hedgehogs in England and Wales declined by over 20% between 2001 and 2004. If they were to continue to decline at that rate, hedgehogs could be a creature of the past by 2025 - a worrying prospect.*

The hedgehog is a listed animal under Section 7 of the **Doc.9)Environment Wales Act 2016** which is *a list of the living organisms and types of habitat which in their opinion are of principal importance for the purpose of maintaining and enhancing biodiversity in relation to Wales. They (Welsh Government ministers) must take all reasonable steps to maintain and enhance the living organisms and types of habitat included in any list published under this section, and encourage others to take such steps.*

Not only are the Welsh government obliged by this act to maintain and enhance the hedgehog and types of habitat that sustain it. It is these animals that are of great importance to local inhabitants, especially children, who learn about the natural world around them and how to care for and conserve it by observing and providing food and shelter for these animals. In the last year there has been considerable local interest in a group of hedgehogs which frequent a garden on the corner of the entrance to Penmaen Park Road. The owner of the house has a night camera and shares photos of them on the village social media page. This is how care for and interest in the environment starts. There is great interest in the village in this group of hedgehogs and as they are listed as important for encouraging biodiversity and as such should be protected from any disruption and stress. Local children are aware of them and look forward to seeing the latest pictures of them eating at night. That these animals may be considered as of

secondary importance to the saving of unspecified amounts of time by vehicles on the A55 would be sending the entirely wrong message that needs to be firmly established in our communities if we are to survive and have an environment that is fit for our children to live in.

I believe, in accordance with Welsh Government policy, that it is very important to establish good practice in doing everything we can to preserve the wildlife that we have and maximise its survival by nurturing and caring for it as well as looking for ways that we can 'increase biodiversity' This noble aim is meaningless if we cannot sustain the populations that we already have and do not have an ethos of truly caring for what already exists naturally in our environment, as well as an interest in attracting new beneficial species.

This is highlighted in the assessment of the effects of the loss of hedgerow and trees in Penmaen Park

*Penmaen Park - ' due to it's classification as a Priority Habitat, taking into context with the wider landscape this VER is considered to be of **Medium - Regional Value** A large area will be lost as a result of land take and may result in the loss of or damage to mature trees (which form a significant feature of the Parkland.) **The loss of mature trees is a conflict of local and government Biodiversity Objectives and policies and cannot be replaced. In the absence of mitigation , the effect is considered to be a Major Adverse Effect.***

DOC1) Chapter 8. See p238. 8.7.40

Mitigation measures are set out on **Doc1** P249 '8.8.31 and include retaining trees near the borders of the scheme and marking out root zones and **Doc 1** p.242 8.7.81. *By replacing the 'species poor' hedge with 'plantation woodland, ornamental shrubs , species rich grassland and open grassland with the intention that it will 'once established, support foraging and commuting habitat for bats and provide habitat for nesting birds' **Doc 1**Chapter 8.7.40p.242*

As already observed - the existing habitat cannot be 'replaced' . New planting will take years to establish and cannot replicate the conditions that would exist had the present environment been left to develop naturally.

Doc 1)Chapter 8 p.250 8.8.42. Says that . *Although there is the loss of a Priority Habitat, the existing hedgerow is species poor, the proposed shrub planting would be more diverse.*

There is no guarantee that by planting different species of shrubs that the local populations of flora and fauna will return or be maintained. As well as the already highlighted in-combination effects, any change in the character of the planting and eco-system may not guarantee a positive effect on the biodiversity of the site. Encouraging Biodiversity may be wasted if the changes are not useful for existing species. e.g. sycamores are hosts to fewer species of beneficial insects than oaks but provide tons of aphids which support large populations of ladybirds and other insects which encourage more garden and woodland birds. Rare or novel isn't always most important. Looking after what we already have should be a priority.

I feel that despite a plan for maintenance of these plans there is no strategy outlined in what the contractors will do if this new planting does not become established or have the desired effect, or how the displaced wildlife will be supported while the mitigation planting establishes itself. The assessment states that the 'proposed habitat' (which suggests that there is no definite

guarantee that it will be undertaken) would be established in the first 5 years. What if it isn't? How will the loss of this important habitat be compensated for?

The importance of the park is not just for maintenance of the local wildlife It also has recreational and health benefits for many Llanfairfechan residents. Many elderly people(and disabled) (as well as lots of young ones) use this space for health/walking/exercise/ dog walking when accessing the beach prom is too far. It is the only open public, off-road, car -free space available to the residents of Parc Henblas, St Winifred's close , the Close and Park Road with restricted mobility. Many of the residents of these dwellings are elderly and use Penmaen Park daily for exercise. Although the scheme will not impact on the established paths through the park it will have a material effect on the landscape and the visual impact of the park .which will materially affect the enjoyment of the area as a green and calm space.

In conclusion I firmly believe that the negative impacts on the wildlife and quality of life of the local residents of this scheme far outweigh any possible advantage that saving what may be a few seconds travelling time on the A55 could possibly have and that any proposal to disrupt and remove established habitats in favour for a scheme to reduce travel times for drivers goes directly against the stated aims of the Welsh Government in all their latest Transport policies, the Prosperity for all strategy and The Future Well-being acts -which are now law in Wales.

I note that EU funding has been secured for this scheme which covers the costings made by the WG when the scheme was proposed in 2015.

Given the current climate crisis, the avowed aims of the Welsh Government to reduce car travel and protect the environment, the time that has elapsed since the original assessments of the cost and the disruption to supplies of materials and a rapid rise in their costs - it would seem contrary to all the stated aims of this government to go ahead with this scheme. Should the scheme be approved there is no guarantee that the mitigation plans would be affordable or carried out or that costs will not rise sufficiently to require Welsh Government expenditure of money that could be more usefully used elsewhere. I do not believe that this scheme is necessary or desirable and implementing it would risk further damage to an already depleted and threatened eco-system. I would like the inquiry to consider the points that I have raised and take them into account when coming to a decision about whether the costs of this scheme both in terms of money and costs to the environment and well being of the residents of Llanfairfechan are really worth some potentially small improvements to journey times on a road that is likely to have less use as Holyhead is replaced as a main distribution port to Ireland and more people work from home and the Welsh Government implement their policy of reducing polluting road transport .