

DCO Examination Process for: Glyn Rhonwy Pumped Storage EN010072

Interested Party Reference Number : 10031924

Date: 12/4/16

Written submission regarding impact of the development on Outdoor Education Centre's usage of Llyn Padarn

I am writing as North Wales Regional Chairman of the Association of Heads of Outdoor Education Centres (www.ahoec.org.uk) the national organisation representing Outdoor Education Centre managers. In this capacity I am speaking on behalf of the organisations that use Llyn Padarn on a regular basis for canoeing, kayaking, and raft building.

We will demonstrate how many young people we collectively take to the lake on a daily basis and therefore the potential impact this development could have on our operations.

It is our contention that the developer has not taken into consideration in the DCO just how important the lagoons area of Llyn Padarn is to the North West Wales Outdoor Education Centres. It cannot be overstated how unique this area is for our work. Nowhere else in the region provides the same benefits as found here. These include, but are not limited to:

- pools sheltered from the weather by tree cover
- shallow water
- easy access close to parking
- pools linked by short channels enabling journeying
- less intimidating environment than larger lake
- access to the wider lake as skills, confidence and conditions allow

As a result of the benefits listed above the site is particularly valuable for groups with special educational needs. Wheelchair access is possible from the parking right up to the water's edge.

Although we use the lake all year round there is greater usage in the period from May to Sept when air and water temperatures are higher. However, of course, even in this period North Wales can experience bad weather and it is particularly on these occasions that Llyn Padarn comes into its own as a prime teaching venue.

1. Usage

The AHOEC has 24 member organisations in North Wales. These organisations all provide residential adventurous outdoor education to school and youth groups from around the UK. Groups generally come and stay for short periods (anything from 2 to 10 days at a time) and take part in a range of outdoor pursuit activities, including canoeing, kayaking and raft building.

The Centre's represented here vary in size with the smallest catering for only a few young people at a time while the largest can house over 230 individuals per visit. Groups are split down into smaller operating teams of 10 – 12 individuals who are led by 1 or 2 instructors. These smaller teams travel to the venues in minibuses towing trailers carrying the boats.

Out of the 24 organisations approximately 16 use Llyn Padarn. It has not been possible to get data from every organisation however, the table below summarises the number of visits that took place in 2015 from a range of Centre's in the region.

Outdoor Education Centre	No. of visits (persons per year)
Marle Hall OEC www.marlehall.co.uk	1850
Plas Gwynant www.plasgwynant.org.uk	580
Blue Peris www.blueperis.co.uk	1700
The Arete Centre www.aretecentre.co.uk	1500
Nant Bwlch y Hearn www.nwoes.co.uk	500
UCLAN www.uclan.ac.uk	500
Lledr Hall OEC www.lledrhall.co.uk	600
Total	7230

As you can see, from just under half the Centres who access the lake, we are already looking at over 7000 young people a year who benefit from educational experiences in this environment. As a consequence it is not unreasonable to expect that in total over 15,000 people use this lake per year just from the Outdoor Education Centres alone. Given the special and unique environment of the Llyn Padarn lagoons that is a lot of people who would lose out were this development to go ahead in its current guise.

During periods of high usage in summer all of the car parking/lake access areas are in use. Gwynedd County Council who manage the lake, through the offices of the Padarn Country Park, don't put a limit on the number of organisations who can use the lake each day. There is a high degree of cooperation between the different Centre's with regard to parking and distribution of groups throughout the lagoons. As a result the area copes well with the numbers demonstrated above.

2. Impact during construction phase

There are a number of factors which will have an impact on Outdoor Centre's operations during the construction phase:

- Reduction in car parking capacity leading to congestion and overuse of remaining areas.
- Greatly hindered access to the lagoons due to construction of the pipeline and pump-house.
- Some lagoons unusable thereby creating congestion in those that are accessible.
- Potential access issues as there is only one road into and out of the lagoons area.
- Potential pollution to the lake during dewatering.
- Pollution from unexploded ordinance and historic chemical weapons storage and disposal within the site.
- Water safety during the dewatering process and impact on swimmer / water user safety.

3. Impact during operation phase

There are a number of factors which may have a continued impact on Outdoor Centre's operations, including but not limited to:

- Area of lake 'out of bounds' due to safety concerns for pipeline abstraction/discharge.
- Reduction of parking area due to fenced off area of pumphouse and associated buildings.

- Potential for pollution in Llyn Padarn from discharging of excess water during operation during periods of high rainfall.
- Potential safety issues for swimmers during unexpected/ unannounced discharges of excess water into Llyn Padarn.
- An overall change in the currently high amenity value of this area of the lagoons.

One area of real concern if the construction goes ahead is, on completion, the area of the pumphouse and pipeline could be surrounded by perimeter security fencing and lighting to protect against terrorist attack. This in turn would permanently restrict access to the area of the lagoons at their north western end. The developer should provide detailed drawings in the DCO showing where security fencing and lighting will be located, in order to provide an accurate picture of the long term implications of siting the development in this location.

4. Economic consequence of loss of site

The outdoor education sector is highly competitive in the UK. Were we not to be able to offer canoeing activities to our client schools and youth groups it is very possible that they would look elsewhere for their adventure residential provision.

Each Centre provides local employment and contributes to the local economy of North West Wales. Newidien report of 2004 demonstrates how important the adventure sector is to the economy of North West Wales.

The developer seems to pay scant regard to this fact in their plans. There is no mention of compensation to the Outdoor Education Centre's who would be directly disadvantaged by this development.

5. Suggested conditions

We suggest the following conditions if the development goes ahead, to mitigate some of the concerns above:

- The main condition is that the discharge pipe is moved away from the lagoons area of Llyn Padarn to a less popular area.
- Water from Q6 is emptied into a holding tank and not directly into Llyn Padarn
- There is some landscaping improvement of the lagoons area to mitigate for the disturbance and change in amenity value
- Businesses affected by the development are adequately assessed

for and compensated for disruption during construction and operation

- There is no unannounced water discharge into Llyn Padarn so swimming safety is not affected
- There is a proper evaluation and clean up of UXO in Q6 by specialist companies rather than the current unfounded “its low risk” approach
- Heavy machinery use and traffic into and out of the site occurs outside the tourist season

Conclusions

We would urge the Examining Authority to recognise the number of people who would be negatively affected by this development as it is set out in the current plans. He should give due consideration to the outdoor education sector which has a long established history of operating in this area of Wales. Many of the organisations represented here have been established in the area since the mid 1900's and have worked in close co-operation with statutory bodies, local authorities and local businesses. We collectively provide direct employment to many people in North West Wales who in turn contribute to the local economy.

Mr Graham Burns

Head of Centre, Lledr Hall Outdoor Education Centre

Representing AHOEC North Wales region

References:

Newidiem (2004) The Active Economy: the value of adventurous outdoor activities to North West Wales; Snowdonia Active