

Dr Emily Wood



Interested Party Unique
Reference Number: **100 31964**

National Infrastructure Planning Directorate
Glyn Rhonwy Development
By email: GlynRhonwy@pins.gsi.gov.uk

12 April 2016

**For attention: National Infrastructure Directorate
In regard to: proposed Glyn Rhonwy Development
Written Representation at Deadline 2**

Dear Sir/Madam,

I am submitting my Written Representation with regard to the proposed Glyn Rhonwy Scheme as an interested party (local resident of Llanberis and recreational user of Llyn Padarn) at Deadline 2 of the examination.

I have previously submitted my concern to the Developer at the Consultation provided on the Draft ES (February 2015). As these concerns have not been adequately addressed by the Developer I wish to make representation and see that these concerns are addressed adequately and ensure that the impacts on Llanberis and its residents are mitigated sufficiently. I am objecting to the fact that the impact assessment and proposed mitigation are not adequate to conserve the recreational amenity of Llyn Padarn and the scenic beauty of the area.

I am writing in specific regard to:

- Electrical connection to Grid;
- Location of Pumping station in Lagoon Area of Llyn Padarn.

I am concerned with regard to the electrical connection to the national grid.

I note in Chapter 3 paragraph 3.4.6 that the consenting of the electrical connection is the responsibility of the District Network Operator (SP (Scottish Power) Manweb) and is classed as Associated Development under the Planning Act 2008. SPH (Snowdonia Pumped Hydro) expects this connection to be provided underground and this is the current offer being discussed with SP Manweb.

I note SPH has no direct control over the electrical connection as it is Associated Development and therefore note that SPH can provide no assurance on the connection.

I note that Chapter 17 Cumulative Impact Assessment considers the inter-related impacts from the grid connection and the Project but no visual assessment is undertaken as the electrical connection is assumed to be underground even though no assurance has been provided that this is the case. This assessment is therefore invalid. The assessment of the worst case visual impact of the overground electrical connection with the Glyn Rhonwy development will be a major adverse significant impact throughout the life of the project on the visual amenity of the area (Landscape Character Area of the highest scenic quality), the tourist value of the area and the residents of the area.

I am concerned by the proposed location of the pumping station within the lagoons area of Llyn Padarn.

I am concerned by the proposed location of the pumping station within the lagoons area of Llyn Padarn in specific regard to:

- Safety to recreational users
- Potential restriction on recreational use of the lagoons area;
- damage to the visual amenity of the area;
- damage to established trees on the Llyn Padarn shoreline; and
- loss of recreational amenity due to noise and light pollution.

Chapter 4 paragraph 4.6.4 states it was agreed with NRW (National Resources Wales) that the approved scheme would be of sufficient depth (5 m) that adverse effects to recreational users in Llyn Padarn would be avoided. The potential effects are not identified such as what depth is actually considered safe to recreational users and whether seasonal variation in water depth has been considered. I am not therefore not convinced that the safety of this outfall can be guaranteed to the recreational users (swimmers/canoists/sailors) in this area.

Paragraph 4.6.9 states that one of the two location's being presented is for the pumping station to be in a vegetated area by the car park. This area is not a car park but comprises a grass picnic area with picnic tables, mature trees and enclosed shallow lagoons for safe sheltered swimming, and as advised by Country Council For Wales (CCW) consultation response to the Glyn Rhonwy Development Scoping Report, February 2013, "The proposed pump house is to be built on the shores of Llyn Padarn, within the area locally known as "the lagoons". The lagoons are a very important recreational resource for local people and tourists".

This area is used all year round for recreational activities including swimming and kayaking by local schools and outdoor education centres. The area is used extensively in the summer term when upwards of 400 children and families may frequent the site after school for recreation and BBQs. There is no clear rationale for

considering the location of the pumping station directly in the middle of the lagoon area when it can be located northwest of the lagoon area (either at the extremity of the Gwynedd Council owned land where a shorter pipe distances could potentially be achieved) or ideally beyond this towards the boat house. The impacts from the pump station with regard to loss of trees, light pollution, noise, and disturbance during construction are all identified in the Draft ES and would be minimised by moving the location outside of this key area.

I am particularly concerned with regard to noise from the pumping station and the potential for a low frequency hum which may impact residential users of this area. At Chapter 12 paragraph 13.8.31 says the pumps are not inherently noisy. What does this mean in way of background humming? The noise assessment is incorrect as does not consider the nearest NSR to the pumping station, recreational users, which is "directly adjacent" and is high sensitivity.

Chapter 15 Socioeconomics advises that the location of the pumping station has been moved from the lagoon area and so it has not been assessed. This is not the case as it remains one of only two options being presented (see Chapter 4 paragraph 4.6.9). This assessment is therefore not correct. I wish to see the removal of the pumping station from the lagoon area, this hugely important recreational area, entirely and wish to see this commitment within the ES.

Yours sincerely

Emily Wood