

**From:** jeff taylor [REDACTED]  
**Sent:** 04 July 2016 11:30  
**To:** Glyn Rhonwy Pumped Storage Scheme  
**Subject:** Response for Deadline 6 from Jeff Taylor on behalf of Concerned about Glyn Rhonwy IP 10031989

**Interested Party ref number 10031989**  
**Response for Deadline 6 from Jeff Taylor on behalf of Concerned about Glyn Rhonwy**

Dear Mr Cowperthwaite,

please find below my comments for the latest deadline

### **Code of Construction Practice**

Regarding our points raised in relation to the Code of Construction Practice we are not satisfied with the Applicants response.

Reiterating the legally binding nature of the document and the assertion that our complaints were dealt with quickly and appropriately does not alter our allegations that the control measures did not work last time, breaches were not prevented even with early reporting of them, and that the measures were not effective. The response was *not quick* and it was *not effective*. The birds in question have failed to nest in the quarry or, as far as is known, anywhere nearby.

### **Environmental Monitoring**

Regarding our points raised in relation to Environmental Monitoring we are not satisfied with the Applicants response.

It remains the case that no significant effort has been made to sample and assess the quality of water and sediment at the bottom of Q6 which is where contamination due to munitions is most likely to be detected and suggests the Applicant really does not want a full and detailed picture of the challenges ahead.

No attempt to assay for radiological contamination has been made and none is proposed – which seems remarkably incurious given the history of the site.

The proposal for real-time monitoring of discharge during dewatering consisting essentially of “looking and sniffing” seems laughable given the fact that potential contaminants could easily be distributed throughout the Seiont river system by the time results of extensive lab analysis are known.

### **Hydrogeology and Flood Risk**

Regarding our points raised in relation to Hydrogeology and Flood Risk we are not satisfied with the Applicants response. Again the Applicant seems to show remarkable lack of curiosity as to the issues presented by the proximity of the Bomb Store void or to issues of wall stability and flowpaths .. essentially the strategy seems to be one of “fill it up and see what happens”

And the question of confidentiality regarding flood flowpaths is not answered.

## **Munitions**

Regarding our points raised in relation to Munitions we are not satisfied with the Applicants response.

The Applicant has emphatically NOT answered the questions raised either by myself or by Dr Presketts extensive evidence.

The issue of the presence of Chemical Weapons and personnel injury resulting therefrom is now reluctantly acknowledged and blamed on document oversight caused by a third party, and the same lack of curiosity in establishing the conditions in the quarry is again evident.

The challenges of dealing with such material are consistently downplayed and understated, and although dealing with chemical weapons may be “routine” in the sense that it has been done regularly before, the challenges are no less great. As shown on a national TV programme about Porton Down only recently dealing with even a single mustard gas shell is a major time consuming and dangerous business. If nerve gas shells were encountered the problems would escalate enormously. This does not even begin to address the question of how such material would be safely transported off-site to be dealt with appropriately. All of which suggests that proper remediation of the site will require an approach almost akin to a time-consuming “forensic archaeological excavation” which is clearly not what a commercial developer will have in mind.

And, as stated earlier, it seems surprising that no monitoring for radioactivity will be done because “there is no evidence to support radioactive waste or munitions as being present” – well there is plenty of evidence of military association with the site and if the Applicant was genuinely concerned to obtain a full appraisal of forthcoming challenges then radioactivity is an obvious parameter to check, so again the Applicant is displaying an alarming lack of curiosity.

And in addressing these challenges the Draft Ordnance Management Plan seems rather light on detail.

Regarding the strong possibility of Chemical Weapons being present it would be interesting to know if the Organisation for the Prohibition of Chemical Weapons has been made aware of this site and the proposals for developing it.

Dr Presketts summary presented as evidence along with our earlier comments called for

- A Waste management strategy proposed and an plausible explanation of why an IPPC permit was not sought for waste arising from the development;
- An equally robust ordnance Magement Strategy that currently requires considerable reworking
- A fuller testing regime of the chemical constituents of Pit2c (Q6)

- A Contaminated land remediation strategy employing best available techniques which should take precedent over the Ordnance Management Strategy.

These conclusions seem to have been ignored rather than addressed.

regards  
Jeff Taylor  
on behalf of "Concerned about Glyn Rhonwy"