

Glyn Rhonwy Pumped Storage Development Consent Order

Deadline 6 – Applicant’s Responses to Examining Authority’s Rule 17 request dated 27th June 2016



PINS Reference	EN010072	
Document Nos.	SPH_GREX_WED6_03	
Authors	SPH/AECOM/GVA/BS	
Revision	Date	Description
0	4 th July 2016	Issued

Document Title	Glyn Rhonwy Pumper Storage Deadline 6: Applicant's Responses to Examining Authority's Rule 17 request dated 27 th June 2016
SPH Document Reference	SPH_GREX_WED6_03
Issue Number	V1
Date	4 th July 2016

SUMMARY

1.1 Introduction

- 1.1.1 On the 27th June 2016 the Examining Authority issued a request for information under Rule 17 of the Infrastructure Planning (Examination Procedures) Rules 2010 (as amended).
- 1.1.2 This document provides SPH's response and comments on this request.
- 1.1.3 Where relevant cross-references are provided to other submission documents.

ExA Question	Applicant
<p>a) What information is required for the withdrawn EP application(s) that is not currently available and why can it not be obtained at this stage?</p>	<p>The Applicant withdrew the permit applications on the 17th June 2016, following advice from NRW's Permitting team. The withdrawal was accompanied with a request for clarification of the details required by NRW in order for the discharge consent applications to be approved. To date, we have yet to receive a formal response from NRW on this matter. It is the Applicant's understanding that NRW requires the following information (NRW will need to confirm the exact details of what information is required):</p> <ul style="list-style-type: none"> • Details of the day to day operation of the Development • Details of a defined Operator • Details of the Principal Contractor • Details within the Water Management Plan, Biosecurity Plan, Silt Management Plan and Excess Water Management Plan which are to be finalised by the Principal Contractor. <p>The information listed above will only be available following the appointment of a Principal Contractor and scheme operator. However, as is typical for development schemes, the appointment of the PC and the scheme operator will be subject to a competitive tender process that cannot be initiated until development consent is in place.</p> <p>The Applicant and NRW have been in dialogue in relation to the Development since 2011. During these discussions, the Applicant has advised NRW that a PC will not be appointed until consent was approved – this was the case for both the T&CPA consent and the DCO.</p> <p>The Applicant can however confirm that NRW has issued the bat license and abstraction license required for the Development.</p> <p><u>Dialogue with NRW</u></p> <p>The Applicant has provided an overview of the dialogue with NRW in connection with the permit applications (both for discharge activities and abstraction) in its response to ExA's Second Written Question 3.12 (see doc. ref: SPH_GREX_SWQD5_011).</p> <p>Prior to the discharge consent application being submitted, the Applicant requested a pre-application meeting with NRW in January 2016. NRW requested that the application be submitted prior to meeting to inform any discussions. The Applicant duly submitted the discharge consent application on the 4th February 2016.</p>

Following submission, NRW requested further information be provided to allow the applications to be “duly made” and the Applicant complied with this request within the timeframe stipulated.

On 5th April 2016, NRW requested further information be provided by the Applicant, including a H1 assessment, progression of the WTMP, SMP, Excess Water Management Strategy, Biosecurity Plan and Environmental Management System (EMS). These documents were submitted to NRW on 13th May 2016 – a date that was agreed in advance with NRW’s permitting team.

Technical Information

H1 Assessment

A H1 Assessment is only required if the discharge for which the permit is sought contains treated or effluent waters. Given that the discharge associated with the Development will be from a freshwater source into a freshwater destination, it will not contain the pollutants that would be considered under a H1 Assessment. Notwithstanding this, the Applicant submitted a H1 assessment to NRW as requested on 13 May 2016.

Environmental Management System

The Applicant has submitted the Framework for an EMS to NRW. This sets out the proposed EMS structure and provides details of basic operational procedures. Pre-operational conditions are included for final versions to be provided (for approval) at the appropriate time and prior to the development becoming operational. This is in line with standard industry practice.

Topic Specific Management Plans

It is the Applicant’s understanding that NRW is unable to determine the environmental permit for the construction period (dewatering discharge activities) as the management plans requested will not be finalised until the PC is appointed. However, the Applicant notes that NRW’s response submitted at Deadline 5 states that the Water Management Plan, Silt Management Plan and Biosecurity Management Plan are now agreed. Compliance with these management plans by the PC can be secured through conditions on the Environmental Permit.

Excess Water Management Plan

The Applicant met with NRW on 9th November 2015 to discuss the Development and the permitting process (including for operational discharges). The meeting was attended by NRW Officers from the permitting and development teams and the agreed minutes of the meeting are appended to this statement. At the meeting, and as recorded in the minutes, the Applicant confirmed that the three operational discharges from each of the reservoirs comprise the following:

- runoff as a result of rainfall; and
- a combination of existing standing water; and
- excess water in the system as a result of rainfall.

Following the meeting, it was agreed by both parties that the contents of the presentation given by the Applicant would provide the basis of the Discharge Consent Supporting Document - a document which was subsequently expanded as part of the Excess Water Management Strategy. The Applicant notes that in its letter of 2nd June 2016 to Emre Williams of PINS, NRW confirms that it is satisfied with the contents of the reports and the strategy for addressing the excess water from the system as operational discharges.

The Excess Water Management Strategy and the Discharge Consent Supporting Statement set out the management regime for the operational discharges, and establish the key parameters for the environmental permits.

The Applicant acknowledges that the Excess Water Management Strategy will need to be refined as the detailed design and construction of the Development is progressed, and has actively sought NRW's views on the strategy. The Applicant has reviewed the comments made by NRW in relation to the Excess Water Management Plan in its letter of 2nd June 2016, and does not consider that the matters raised require any fundamental changes to the strategy or its agreed principles.

Further Information

The Applicant considers that sufficient detail has been provided in support of the discharge consent application. The level of detail, and the accompanying assessment information provided is consistent with that submitted in support of the DCO application and the other consents and license applications which have been approved by NRW. The topic specific management plans have been advanced as the DCO Examination has progressed and all additional information has been subsequently submitted to support the permit applications. The updated management plans have been approved by NRW as part of the DCO process.

	<p>As outlined in the Applicant's response to Question 3.12 of ExA Second Written Questions (see doc. ref: SPH_GREX_SWQD5_01), the Applicant has been in liaison with NRW and its predecessors for over 4 years.</p> <p>The Applicant would welcome further clarification from NRW, and will endeavour to submit the discharge consent applications again during the DCO process, if further clarification makes that possible.</p> <p><u>Statement of Common Ground Wording</u></p> <p>The Applicant and NRW have agreed on the following areas of common ground in relation to the discharge consent applications:</p> <p>Q. ENVIRONMENTAL PERMIT (EP) Background</p> <p>3.Q..1 The Parties AGREE that an EP (for discharge activities) is required under the Environmental Permitting (England and Wales) Regulations 2010 prior to the operation of the Project. The Parties AGREE that NRW is the relevant competent authority in respect of an EP application.</p> <p>3.Q..2 National Policy Statement EN1 (paragraph 4.10.6) states that, wherever possible, applicants are encouraged to submit applications for EPs at the same time as applying for development consent and that a DCO application should not be refused on this basis unless the Secretary of State has "good reason to believe that any relevant necessary operational pollution control permits or licences or other consents will not subsequently be granted" (EN-1 paragraph 4.10.8).</p> <p>3.Q.3 The Applicant has applied for an EP in respect of discharge activities under the Environmental Permitting Regulations 2010 (ref WPCC4518 and WPCC4519). These were withdrawn on the 17th June 2016, following discussions with NRW.</p> <p>3.Q.4 Both parties AGREE that an abstraction licence and its variation to abstract up to 3300m3 a day has been approved" (WA/065/0016/007/V001)</p>
<p>b) Why the withdrawn EP(s) cannot be granted before this information is available, subject to conditions?</p>	<p>No action required.</p>
<p>c) What EP application(s) will be made post DCO</p>	<p>in addition to the recently withdrawn consents to discharge water from the scheme – initial dewatering of quarries & discharges during operation (total x6) no additional licences are anticipated to be required</p>

<p>consent (if consent is granted)?</p>	<p>under the Environmental Permitting Regulations 2012 to be submitted by the Applicant. The only exception are any permits for discharges to air, land or water which may be subject to the detailed design of the Development, or those permits which the Principal Contractor and their subcontractors may be more appropriate to obtain (such as waste management licences for example).</p>
<p>d) Based on the information currently available to the NRW and without prejudice to its determination of any future EP application(s):</p> <ul style="list-style-type: none"> i. Is NRW satisfied that potential releases can be adequately regulated under the pollution control framework? ii. Does NRW have any reason to believe that the outstanding EP application(s) identified above will not be granted? 	<p>No action required.</p>
<p>e) What confidence is there that the conditions that may be imposed in the outstanding EP(s) will be consistent with the requirements of the draft DCO?</p>	<p>As outlined in the Applicant's response to Question 1.36 of the ExA's Second Written Questions (Doc Ref: SPH_GREX_SWQD5_01), NRW are the competent authority in relation to any environmental permit submitted under the Environmental Permitting Regulations 2010. It is the responsibility of NRW as the competent authority to place conditions to ensure no likely significant effects.</p> <p>It is common for EP(s) to be granted alongside DCOs and planning permissions for a wide range of developments. There is a wealth of precedent and experience to ensure that the two regimes complement and do not conflict with each other. This is in line with the guidance in EN-1 quoted in the Applicant's D5 submission, and is also good practice.</p>

	<p>Whilst the conditions in EPs are a matter for NRW, as the consenting body, there is nothing in the proposed requirements in the draft DCO which gives the Applicant concern over any conflict between the operation of the two consenting regimes. In fact the advance knowledge of the DCO requirements should assist.</p> <p>Accordingly, there can be a high degree of confidence that the EP conditions will be consistent with the DCO requirements</p>
<p>2. With reference to Article 9 of the draft DCO, please could the applicant provide the following:</p> <p>(a) Suggested rewording of Article 9 to address that s65 of the Control of Pollution Act 1974 was repealed by the Deregulation Act 2015.</p> <p>b) Justification of the extension of the relevant model provision, which only relate to noise emitted from premises.</p>	<p>The Applicant has amended Article 9 as follows:</p> <p>9.—(1) Where proceedings are brought under section 82(1) of the Environmental Protection Act 1990(a) (summary proceedings by person aggrieved by statutory nuisance) in relation to a nuisance falling within paragraphs (c), (d) (e), (g) and (ga) of section 79(1) of that Act no order is to be made, and no fine may be imposed, under section 82(2) of that Act if—</p> <p>(i) relates to premises used by the undertaker for the purposes of or in connection with the construction or maintenance of the authorised development and that the nuisance is attributable to the carrying out of the authorised development in accordance with a notice served under section 60 (control of noise on construction sites), or a consent given under section 61 (prior consent for work on construction sites) of the Control of Pollution Act 1974(a); or</p> <p>(ii) is a consequence of the construction or maintenance of the authorised development and that it cannot reasonably be avoided; or</p> <p>(b) the defendant shows that the nuisance is a consequence of the use of the authorised development and that it cannot reasonably be avoided.</p> <p>(2) Section 61(9) (consent for work on construction site to include statement that it does not of itself constitute a defence to proceedings under section 82 of the Environmental Protection Act 1990) of the Control of Pollution Act 1974, will not apply where the consent relates to the use of premises by the undertaker for the purposes of or in connection with the construction or maintenance of the authorised development.</p> <p>The Infrastructure Planning (Model Provisions) (England and Wales) Order 2009 include Model Provision 7 which relates to proceedings brought by an “aggrieved individual” in relation to an alleged statutory nuisance under section 82 of the Environmental Protection Act 1990. The Applicant is not aware of any formal government guidance in relation to the detail of the Model Provisions included in this Order. The Applicant considers that this provision was included to put beyond doubt that the effect of section 158 would apply equally across all procedures under which nuisance proceedings could be invoked. The</p>

effect of Article 9 of the DCO is to put the interaction of section 82 (Abatement Order sought by aggrieved person) with the Control of Pollution Act 1974 noise control regime on the same footing as section 80 (Abatement Notice by local authority). This is because of the provisions of section 80(9) are not included in section 82. This wording has been included in numerous DCOs and it is clear that the Secretary of State has been content with the justification for it.

APPENDIX

Meeting Minutes



Project:	Glyn Rhonwy Pumped Storage DCO	Job No/Ref:	60334725
Purpose:	Environmental Permit Application for Operational Discharges	Date held:	09/11/205
Held at:	NRW Maes Y Ffynnon offices, Bangor	Made by:	CA (AECOM)
Present:	Catherine Anderson, AECOM Dylan Huws, AECOM Gareth Thomas, NRW David Wilby, NRW Huw Jones, NRW Emyr Gareths, NRW	Distribution:	All attendees
On Telecon:	David Holmes, Snowdonia Pumped Hydro Chris Williamson, Snowdonia Pumped Hydro Julie Drew-Murphy, Snowdonia Pumped Hydro Terry Gulliford, NRW		
Apologies:	Iwan Huws, NRW Sian Williams, NRW		

No.	Item	Action By
1	Introduction	
1.1	Introductions and apologies made	
1.2	<p>CA outlined the five points of discussion:</p> <ul style="list-style-type: none"> • Presentation by AECOM to explain the operation of the scheme: <ol style="list-style-type: none"> 1. Set out the scheme operation and outline the methodology of managing excess water (direct rainfall). 2. Set out maximum release flows and give estimated quantities of overall maximum excess water expected to be released from the scheme (annually). • Explain rationale behind only applying for one consent per reservoir - "Release of non-polluting surface waters from a reservoir do not require a permit or consent" therefore water from the spillway should not need permit or consent. • Question for NRW - How are existing reservoirs regulated and what environmental permits are currently held by existing reservoir owners under EPR 2010? • Question for NRW - Please explain why water (rainfall) from the reservoir spillway requires a discharge consent? Annex 9 – Regulation and risk assessment of reservoir releases: "Release of non-polluting surface waters from a reservoir do not require a permit or consent" • How are the Excess Water Management Strategy and Bio-security Risk Assessment to be secured, as these are also DCO Requirements? 	
1.3	CA explained outlined that the DCO application had been submitted to the Planning Inspectorate and that this was currently being reviewed with the deadline for Acceptance being the 19 th November. SPH had submitted DVDs of	

	<p>the submission to NRW for information purposes whilst awaiting the formal Acceptance.</p> <p>CA confirmed that the only difference between those received by NRW for information to those formally received once accepted will be one Appendix (Appendix 2.5 Draft Environmental Statement) has been split further to allow PINS to upload to their website and the addition of the welsh translation documents.</p>	
2	Presentation from AECOM	
2.1	<p>DH outlined the purpose of the presentation and that the figures are for illustrative purposes. The presentation was a schematic overview of the scheme and the operational discharges that would be required. The main reason for this meeting is to discuss the operational discharges.</p> <p>DH outlined that dewatering of the quarries was needed. Q1 would be into the Nant Y Betws and Q6 into Llyn Padarn. SPH recognise that discharge consents would be required for these discharges.</p>	
2.2	<p>EG enquired about the spillways. DH outlined that both reservoirs are non-impounding and the spillways themselves would act as bellmouth pipes.</p>	
2.3	<p>DH outlined the animation on slide 10 which shows the Development being “charged” with 1,300,000m³ from Llyn Padarn. There is no abstraction from Nant Y Betws.</p> <p>DH outlined this Development is a closed system, with little if any interaction with the wider catchment. There are natural catchments which will collect rainfall, and when this rainfall exceeds the losses (either through drainage or evaporation) then that’s when the normal operational discharges will be required.</p> <p>When this rainfall collects, there is sufficient freeboard within the Development in each reservoir to store this excess water. This will be discharged to Llyn Padarn when there is no flood risk present i.e. outside a flood event</p>	
2.4	<p>HJ asked about the rate of discharge. DH outlined that this is explained later in the presentation but there are requirements due to Reservoir safety on how quickly the Development can draw water down but normally can be over a prolonged period.</p>	
2.5	<p>EG asked whether there would be any discharges from Q1 under normal operating conditions. DH said no, the water needs to be kept within the system. If there were to be normal operational discharges, the primary point of discharge would be to transfer the water to Q6 (i.e. to generate power), and discharge through Llyn Padarn.</p>	
2.6	<p>DH outlined the reservoir draw down process on Slide 17 and the fact it is a safety function. To ensure safety, these relief valves will be tested for maintenance and therefore operated to demonstrate reservoir safety, These valves are opened and run until the water is clean, which means they would be opened for a matter of minutes. It is unlikely that these would have much sediment due to the orientation of the valves. Plus the reservoirs would have been in daily operation and so would have very little time for any sediment to settle.</p> <p>EG asked about topping up of the water lost. DH stated that the losses could be a few hundred cubic metres, so in comparison to the 1,300,000m³ available in these reservoirs, it would not be an issue.</p> <p>DH outlined if the water needed to be drawn down, then the primary means would be to discharge through the penstock to Q6 and vice versa. This has an operational benefit as the Development would generate</p>	

- 2.7 DH outlined that if there are abnormal circumstances, there are various mechanisms in place should the system not be running for a long time or a prolonged rainfall event. If the penstock is not available, then relief valve arrangements would release – Q1 to Nant Y Betws, Q6 to Llyn Padarn.
- HJ asked about the volume of water in the case reservoir safety. DH confirmed that the relief valve arrangement can release the water behind the dam. The penstock would release water beneath the dam.
- GT asked about the life span of the penstock. CA confirmed that the Development has a potential lifespan of 125 years (with maintenance) and that is what has been assessed in the Environmental Statement.
- DH reiterated that normal operation would involve the penstock. In the cases that the penstock was not available, in abnormal circumstances the relief valves would draw water down to the bottom of the dam. An extreme scenario would be where the Development hasn't been run for a long time and there is a prolonged extreme weather event, the spillways would then be activated. However this would be no different than the natural catchment runoff at present given the small contributing area.
- EG enquired about the current situation as Q1 is not full. CA clarified that Q1 has a very existing small pond, about 7m deep.
- HJ asked whether the base of the quarry will be sealed. DH confirmed that this will be confirmed once the infiltration test results of the secondary ground investigation has been completed prior to construction. It will be key to minimise any losses to keep the closed system filled, given the standing water within Q1 and Q6, infiltration is probably low. However given the additional head of water, lining may be required.
- 2.8 DH outlined that there is ponding water in Q1, approximately 5000m³. In Q6 approximately 100,000m³ taking account of saturated spoil. This will need to be dewatered. Water sampling has been undertaken and contained within the submitted Environmental Statement and be subject to existing regulatory controls.
- 2.9 In summary, DH outlined the mechanisms in place which have been previously provided to NRW in the operational discharge technical note. These include the use of the freeboard and discharge through the penstock in normal circumstances, maintenance discharges, and also abnormal and extreme scenarios comprising reservoir safety.
- GT asked about the timescales to use the freeboard under normal rainfall conditions. DH stated that it would take weeks or months to use the freeboard. There would be two scenarios to manage that excess water, either to use the freeboard up to spill level, or use the relief valves to relieve the pressure on the reservoir and release when there is an appropriate time to do so i.e. no flood risk. CA added that the Development would also be in operation during this period and so the penstock would have been in use, and so discharge into Llyn Padarn.
- DH stated that the penstock will draw down at 46 m³/s and this will be over the course of the reservoir draw down. Operationally this would be up to 7 hours. If the reservoirs are to be draw down by 50%, this would take 7 days and is in line with standard guidance. To achieve this draw down at Q1, this would be at a rate of 0.6 m³/s and at Q6, this would be 0.3 m³/s. This is significantly less than the penstock capacity and would take longer, and so demonstrates why the penstock would always be the primary method of draw down between the reservoirs.
- Therefore at the point of discharge on the Nant Y Betws, this would be at 0.6m³/s. The natural flow of the catchment is 0.8m³/s in a Qmed so the flows

from operational discharges would not exceed those during a frequent flood event, and that it would be less than that from the natural catchment in such an event. Any discharges would also be dissipated by the time it would reach the caravan park.

EG what receptors have you considered other than the caravan park.

DH confirmed that its the first receptor from the discharge point. The flow at the caravan park is also greater at the discharge point due to the additional catchment (approximately 2.5m³/s in the Qmed) based on the larger catchment area.

DH continued that there is no intention to spill. Any "spilled" water is lost water and therefore lost revenue. Any discharges would be considered, as per EA/NRW guidance, to be non-polluting water. The spillway is a redundant measure to ensure reservoir safety, as having a dam at risk is a far greater risk scenario.

DH concluded the presentation and point one of this agenda point. With regards to the second point the maximum releases have been outlined in the presentation with Q1 at 0.6m/s and Q6 at 0.3m/s.

- 2.10 EG agreed that the flows would not lead to flood risk at the caravan site, as long as its timed not to coincide with a flood event. Would need to have some operational rules.

CA asked whether this would be part of an Excess Water Management Plan. This is to be secured via DCO Requirement as part of the DCO process

EG agreed that it needs to be secured appropriately and DCO is the best mechanism. EG continued that it may be worth having a look at other structures and that a walkover study should be undertaken. Recognise that its mainly farmland, forestry tracks and roads so culverts may be undersized and therefore could be constraints.

DH confirmed that informal or private access arrangements have not been looked, just main highways. Its primarily upland areas but agreed to review and confirm in the applications.

EG had no further comments on the flood risk.

- 2.11 DH asked whether it is accepted that as the spillway will be natural runoff, will an application still be needed? GT and DW stated that due to unknown nature of the water to be within the closed system, NRW are minded to still require the application for spillway discharge.

CA enquired as to what further information is required as baseline water sampling has been collated and is included within the Environmental Statement.

DW outlined that the guidance relates to open system reservoirs, and not in the case of this Development, which is a closed system.

CA stated that the Development is being charged with water from Llyn Padarn and the water quality of this catchment is not in question.

DW and HJ outlined that its not clear how the water travelling between the two reservoirs in operation may change due to outside interaction such as vegetation and sediment coming into the quarries.

GT stated that construction works may change the water quality.

DH and CA responded outlining that the quarries would have been completed and finished prior to the charging from Llyn Padarn. The stabilisation works will have been completed. This Development is a closed pressurised system, plus there are very small contributing catchment areas and sediment source, and so the likelihood of there being any significant changes in water quality which aren't

covered by regulatory controls is very unlikely.

HJ the request for a discharge consent is sought as assurance for the water quality being discharged, not only back to Llyn Padarn but also potentially cross contaminated as well to the Gwyrfai.

CW asked whether if after continual demonstration that water quality was not being degraded during operation, could the consent be surrendered or removed?

HJ stated that it could be possible but it's all an unknown at this stage. There is a concern as well that vegetation that gets blown into the reservoirs will be pulverised by the turbines, and could form a basis for algae growth.

CA reiterated that the water does not get oxidised travelling from one reservoir to the other due to the highly pressurised system, so there is no additional air.

HJ agreed

CA stated that whilst the point is noted, the potential for leaf litter is considered to be minimal, especially at Q1. Also the trees surrounding Q6 will be removed to facilitate a safe working environment and to enable the stabilising works. Therefore we consider the risk from this to be very small during operation, and so we could keep the requirement for spillway discharge consent under consideration and to be demonstrated through the operational water quality sampling? CA stated that this seems a very precautionary approach and asked HJ whether the water quality and cross catchment issues were the main concerns, or has this presentation helped to alleviate these concerns?

HJ the presentation does assist but the consents are still required. The concern is that organic matter will get into the system and be constantly moved around.

CA asked what further mitigation may be required and added to the environmental risk assessment within the consent applications. There are a lot of duplication – would be able to reference the detail in DCO to avoid duplication?

GT agreed it was fine to reference the DCO information

2.12 CA asked DW for absolute clarity the terminology to use – SPH are applying for discharge consents under the Environmental Permitting Regulations 2010

DW and TG confirmed this to be the case for the two construction and four operational discharges

DH asked about the four operational discharges – is there a requirement for four operational applications as they are not polluting discharges and the spill would only happen if the water had been building up, not released through the penstock and would only be released as a safety measure? One discharge method is in a controlled manner, and the other is there as a backup safety measure. It is exactly the same design of a kitchen sink – with the plug hole acting as the relief and the spill valve acting in the same way stopping the sink from overflowing. Essentially, if there is a belief that the water is going to mix and not going to be the non-polluted runoff from the small catchment, then it's all the same water, and should be counted as one consent application. If there is a belief that the water is not going to mix in that timescale, then the spillway does come under the non-polluting discharge and therefore not required as its non-polluting.

HJ requested that this is submitted in writing to NRW with justification, so that a formal response can be provided.

CA this would be submitted prior to the application submission and be applicable for Q1 and Q6.

AECOM

- 2.13 CA asked if cross contaminated is still a concern
- HJ confirmed yes it does, especially from invasive species given the recreational use of Llyn Padarn from something like vampire shrimp. There would need to be measures in place to avoid any contamination of neighbouring catchment
- CA confirmed that invasive species had been undertaken and are included within the submitted Environmental Statement. No invasive species have been found. It was also stated by CA that it would be unrealistic to try and assess the impact of an invasive species, not currently present within Llyn Padarn and an action totally unrelated to the Development. It is highly unlikely that any invasive species which may be brought into the Development from top up abstractions are unlikely to survive at the depth of the intake and penstocks within the reservoirs, let alone going through the turbines / pumps. What other assurance can SPH provide?
- HJ outlined that there would need to be a statement that should invasive species be found in Llyn Padarn, that SPH would work together with NRW on an Action Plan
- CA confirmed that this already a DCO Requirement and will be referenced within the permit applications / risk assessment.
- DH asked about Dinorwig operational discharges
- HJ stated that Dinorwig was consented way before any of these issues became known. Plus Llyn Peris does not have the level of recreational activity than Llyn Padarn has. It will be the recreational uses that cause the greatest risk to the biosecurity of Llyn Padarn.
- CA asked if there is any management plan for bio-security.
- HJ confirmed that Parc Padarn will be responsible for the recreational uses.
- 2.14 DH asked for clarification on the term “modelling”. AECOM have undertaken hydrological modelling for the purposes of the discharge consent application for the Nant Y Betws. To try and hydraulic model this watercourse would be very difficult due to its flashy nature.
- EG noted that the requirement for looking at structural pinch points such as undersized culverts to demonstrate this.
- DH noted that the Gwyrfai catchment is significantly greater than Nant y Betws and therefore Nant y Betws only plays a small part in flood flows downstream of the confluence.
- EG agreed.
- DH to dewater Q1, its 5000m³ and which would only take a few hours to dewater based on the 0.6m³/s rate. Reality is that it would be carried out over a longer period of time.
- EG confirmed that NRW would need another management strategy to provide assurance that the dewatering would not be undertaken inappropriately. It would need to be secured.
- CA suggested the Excess Water Management Strategy is more operational but it could be undertaken through Water Management Plan or Construction Code of Practice, both of which are DCO Requirements. CA requested that this is included within the first response NRW provides, that a construction phase pumping strategy.
- End of Meeting**