

Glyn Rhonwy Pumped Storage Development Consent Order

Deadline 8 – Applicant’s Responses to Written Submissions made at Deadline 7



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APPLICANT'S RESPONSE

1.1 Introduction

1.1.1 The Applicant has reviewed the written representations received at Deadline 7 and wishes to provide a response only to Dr Dave Preskett, whose comments are made on behalf of Jeff Taylor and also Mr Jeff Taylor on behalf of CAGR.

1.2 Response to Dr Preskett

1.2.1 In response to Dr Preskett's representation, the Applicant can confirm that the evidence presented has already been released by the Ministry of Defence (MOD) and has been seen by the Applicant. This was documented in the Applicant's response to the Rule 17 request (question 8.3) submitted at Deadline 7 (SPH_GREX_WED7_01).

1.2.2 The clearance certificate presented in the MOD documentation had already been released into the Gwynedd Archives after the initial Freedom of Information Act request made in 2014 and was included in the risk assessment prepared in Appendix 8.5 of the Environmental Statement (ES) (doc ref 6.02). This documentation continues to support the conclusion of the detailed desk study (Appendix 8.5) and risk assessment, that the potential for chemical munitions to be present on the site is very low.

1.2.3 Various independent sources of information support a low risk assessment, as previously provided by the Applicant at:

- Deadline 4
 - SPH_GREX_WED4_02 - Applicant's Responses to Written Submissions made at Deadline 3 (specifically Section 2 Jeff Taylor)

- SPH_GREX_WED4_03 - Applicant's Written Summary of Oral Case of Issue Specific Hearing 17th May 2016, Section 5, specifically in response to Question 5.1
- Deadline 5
 - SPH_GREX_WED5_01 - Applicant's Response to Written Representations made at Deadline 4
 - SPH_GREX_SWQD5_01 - Applicant's Responses to Second Written Question, Section 9, specifically Q9.5
- Deadline 6
 - SPH_GREX_WED6_02 - Applicant's Responses to Written Submissions made at Deadline 5
- Deadline 7
 - SPH_GREX_WED7_02 - Applicant's Response to Examining Authority Rule 17 Request, Section 8

1.2.4 Furthermore, there remains no positive, corroborative evidence to indicate that munitions contained nerve agents were ever disposed of at RAF Llanberis. This is reiterated in the latest MOD correspondence within the Applicant's Rule 17 submission (Question 8.3 and Appendix 8.3) after review of the archive records initially released into the public domain at the request of the Applicant's UXO specialist, Zetica.

1.3 Response to Mr Jeff Taylor

1.3.1 In response to Mr Taylor's response on contamination, any potential risks to controlled waters and human health from previous uses and contaminated land have already been assessed within Chapter 8 Geology and Ground Conditions of the submitted ES. The methodology for the identification and remediation of any identified contaminated land is outlined in the Land Discovery Strategy (LDS) (SPH_GREX_DCOD5 (Rev1)) which was submitted at Deadline 7. In addition, the requirements of LDS mirrors the appropriate contaminated land conditions imposed on the approved scheme. Any removal of UXO is to be outlined in the Ordnance

Management Strategy (OMS) as submitted at Deadline 7 (SPH_GREX_DCOD4 (Rev2)).

- 1.3.2 Any further clarity on the differentiation between and overlap of contaminated land and UXO is outlined in the Applicant's response to Second Written Question 8.14 (SPH_GREX_SWQD5_01) and also the Applicant's response to Natural Resources Wales submitted at Deadline 7 (SPH_GREX_WED7_01).
- 1.3.3 The Applicant notes that the Respondents have carried out their own water quality testing. The Applicant wishes to again reiterate that a comprehensive water monitoring exercise, which was agreed in advance with NRW, has been carried out by the Applicant. The Applicant has previously provided the results, as well as extensive analysis and commentary throughout the examination process.
- 1.3.4 There is no indication that good or reasonable practice has been followed in either the sampling or analysis the Respondent claims to have carried out. There is also a general lack of clarity within the presentation and interpretation of the data. Based on this, the Applicant considers that any conclusions drawn from the data are unlikely to be valid, and cannot be verified. The Applicant would also like to point out that the results are not supported by the extensive monitoring carried out by the applicant, with samples collected by trained professionals, analysis undertaken at accredited laboratories on criteria selected and agreed with NRW.
- 1.3.5 Calder Hall (the World's first commercial nuclear power station) opened in 1956 and so would have only produced spent rods after that date. Nuclear waste in the UK is not disposed of by random dumping. There is no indication in any records that disposal of nuclear material was ever disposed of at Glyn Rhonwy. The Respondent's own data supports the conclusion that there is no reason to believe that any fuel rod material was dumped at Glyn Rhonwy, as both U and Th are at the limits of detection or below it. In addition NRW have also agreed that a radioactive survey is not required in their written response at Deadline 6.

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- 1.3.6 Therefore it is difficult to draw a comparative conclusion on this analysis, especially as the Applicant has received approval from NRW, Gwynedd Council and now Public Health Wales on the pre-construction water sampling and the Water Management Plan (SPH_GREX_DCOD3_02 (Rev3)).
- 1.3.7 We trust that this outlines the Applicant's position, that there is sufficient information already submitted by the Applicant throughout the examination period to adequately address the issue reiterated by Dr Preskett and this has been signposted in the submission above. Therefore the Applicant confirms that it wishes not to respond to any other responses received at Deadline 7.