

**From:** [Lewis, Ben \(Bilfinger GVA\)](#)  
**To:** [Glyn Rhonwy Pumped Storage Scheme](#)  
**Subject:** EN010072 - Development Consent Order for the Glyn Rhonwy Pumped Storage (Generating Station)  
**Date:** 10 January 2017 21:46:37  
**Attachments:** [Applicant's Response to SoS Request for Comments 100117 \(SUBMITTED\).pdf](#)  
**Importance:** High

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Dear Sir / Madam

Further to the letter from the Secretary of State for Business, Energy and Industrial Strategy ("the Secretary of State") dated 21<sup>st</sup> December 2016, please find attached the Applicant's comments on those matters where the Secretary of State has requested further detail or clarification.

I trust the attached is in order and would be grateful if you could confirm receipt in due course. Should you require anything further, please do not hesitate to contact me.

With kind regards

Ben

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## Glyn Rhonwy Pumped Storage Development Consent Order

Applicant's Response to Secretary of State's Request for Comments  
dated 21<sup>st</sup> December 2016

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<b>PINS Reference</b>	EN010072	
<b>Document No.</b>	SPH_GR_SoSQ.1	
<b>Author</b>	Snowdonia Pumped Hydro Ltd	
<b>Revision</b>	<b>Date</b>	<b>Description</b>
0	10 <sup>th</sup> January 2017	Submission Version

Question number	Question to	Question
1.	<b>Statutory Nuisance</b>	
1.1.	Applicant & Gwynedd Council	<p>The Secretary of State notes that the Applicant's Explanatory Memorandum dated 4 July 2016 which was submitted for Deadline 6 indicates that its Article 9 is based on Model Provision 7 of the Infrastructure Planning (Model Provisions) (England and Wales) Order 2009 which was repealed by the Localism Act 2011. He also notes that the provision in the Applicant's proposed development consent order had been expanded by the Applicant to enable the undertaker to rely on it in respect of air quality and noise from streets which have been identified as a risk during construction.</p> <p>However, the Secretary of State wishes to consider whether the Applicant's proposed Article 9 wording is appropriate to the risks of nuisance that have been identified. In considering this matter the Secretary of State has produced some alternative wording for Article 9 – see below - and would be grateful for the views of the <b>Applicant</b> and <b>Gwynedd Council</b>.</p> <p><i>1. "(1) Where proceedings are brought under section 82(1) of the Environmental Protection Act 1990(1) (summary proceedings by person aggrieved by statutory nuisance) in relation to a nuisance falling within paragraphs (c), (d), (e), (g) of section 79(1) of that Act solely caused by noise, other than vibration, no order is to be made, and no fine may be imposed, under section 82(2) of that Act if the defendant shows that the nuisance—</i></p> <p><i>(a) 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(2); or</i></p> <p><i>(b) is a consequence of the construction of the authorised development and that it cannot reasonably be avoided.</i></p> <p><i><del>b) the defendant shows that the nuisance is a consequence of the use of the authorised development and that it cannot be reasonably avoided.</del></i></p> <p><i>(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."</i></p> <p>The Applicant notes that while there were numerous questions on this article during the examination it has never been made clear what the concern was. Given that this provision has been routinely included in DCOs the Applicant remains unsure what the point of concern which has prompted this query is.</p> <p>This Article ties into the general defence to nuisance granted to all nationally significant infrastructure projects consented by DCO under section 158 of the Planning Act 2008. There is accordingly statutory authority that some forms of development are in the public interest and should benefit from protection from being stopped due to causing nuisance. The benefit of this has been generally applied in DCOs. This article is drafted to put beyond doubt that the defence applies across all procedures under which nuisance proceedings could be raised and puts an 'aggrieved person' under section 82 in the same position as a local authority acting under section 80.</p> <p>The scope of the defence for section 80 covers all claims of nuisance of whatever type. It accordingly covers all of the matters included within subsections (c) (d) (e) and (g). This article is far more limited than that statutory defence and is only intended to cover a potential lacuna in the statutory authority defence provided in the 2008 Act.</p> <p>The Applicant would advise that as set out in the Statement of Statutory Nuisance submitted as part of the application the various elements have been considered under the headings listed as follows:</p> <p>c) and d) concern fumes from vehicles and machinery used to construct the authorised development and dust from the construction operations and raised by vehicle movements. In particular the initial stage of blasting is likely to create a large amount of dust. There is not anticipated to be any source of fumes during operation. There may be some dust carried off the site immediately following construction as the re-profiled slate mounds are exposed to the elements. These matters form part of air quality as assessed in the Statement of Statutory Nuisance.</p> <p>e) The construction of the project will require the creation of new slate mounds which would fall within the definition of "deposit". This is likely to have some dust impact. This is considered to form part of air quality as assessed in the Statement of Statutory Nuisance.</p> <p>g) concerns noise. Noise has been assessed within the Statement of Statutory Nuisance for both the construction and operation phases.</p> <p>The article as amended has been restricted to noise only. The defence provided in section 158 will apply to use of the development as well as construction. The Applicant accordingly objects to the deletion of the wording "the defendant shows that the nuisance is a consequence of the use of the authorised development and it cannot be reasonably avoided" so as far as (g) is concerned as the statement of statutory nuisance has assessed noise at both construction and operation stages.</p>

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			<p>This deletion would render the defence unavailable at the operation stage which does not align with section 158.</p> <p>The Applicant considers that it is not appropriate to exclude vibration as Section 79 (7) of the EPA includes the statement "noise" includes vibration.'</p> <p>The Applicant objects to the deletion of use clause: <i>"the defendant shows that the nuisance is a consequence of the use of the authorised development and that it cannot be reasonably avoided"</i>. Section 158 applies to use as well as construction and this provision should mirror the scope of that statutory authority.</p> <p>In subsection (2) the Applicant objects to the deletion of the words <i>"or maintenance"</i> of the development. The anticipated operational lifespan of the development is 125 years. It will be necessary during that time to undertake substantial replacement works and the protection given to original construction should be available to these works.</p>
<b>2. Historic Environment</b>			
2.1.	Applicant, CADW, Gwynedd Archaeological Planning Service, & Gwynedd Council	<p>The Secretary of State is considering whether the possible effect of the project on the historic environment, including heritage assets and the overall Dinorwig Registered Landscape of Outstanding Historic Interest.</p> <p>Given the possibility identified by the Applicant of significant impacts on heritage assets, some of which may be of national significance, the Secretary of State wishes to consider whether additional mitigation measures are necessary to provide comfort that protection of the historic environment will be secured. The Secretary of State is, therefore, considering whether to include in any development consent order that he might issue the following Requirement:</p> <p><b><i>"Archaeological compensation and enhancement strategy</i></b>  <b><i>2.—(1) The archaeological compensation and enhancement strategy must comply with the minimum standards in the outline CoCP and outline archaeological compensation and enhancement strategy certified under article 36 (certification of plans etc.).</i></b></p> <p><i>(2) The strategy under sub-paragraph (1) must include a written scheme of investigation approved by the relevant planning authority prior to the commencement of any of the authorised development and that must include provisions for:</i></p> <ul style="list-style-type: none"> <li><i>(a) a pre-commencement survey of the existing bomb store identified in Chapter 11 of the environmental statement and a watching brief during any works in its vicinity;</i></li> <li><i>(b) other areas where a watching brief is required;</i></li> <li><i>(c) the measures to be taken to protect, record or preserve any significant archaeological remains that may be found;</i></li> </ul>	<p>The Applicant has reviewed the question from the Secretary of State and refers to the responses provided in document REP7-004 (SPH_GREX_WED7_02) question 4.8 submitted at Deadline 7. The Applicant wishes to re-emphasise that the bombstore itself is outside the Order Limits of the proposed development, is not within the land ownership of the Applicant and no direct physical impacts are anticipated.</p> <p>However the Applicant has reviewed the revised Requirement and offers no amendment to the suggested Requirement subject to it being recognised that access will have to be granted by Gwynedd Council.</p> <p>The Applicant has previously provided comments on the assessment made within the Environmental Statement and that Gwynedd Council and CADW have entered into a Statement of Common Ground on the basis of the acceptability of the assessment of potential effects.</p>

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		<p>(d) the analysis, archiving and publication of the results of any archaeological investigations;</p> <p>(e) the organisation and deposition of the archaeological investigation archive into an approved repository; and</p> <p>(f) areas where palaeo-environmental sampling must be carried out to establish the presence and extent of any surviving peat deposits and the measures to be taken where any such deposits are found.</p> <p>(3) The strategy under sub-paragraph (1) must include the identification of any opportunities for interpretation and public engagement in relation to the existing bomb store identified in Chapter 11 of the environmental statement.</p> <p>(4) Subject to requirement 21, the authorised development must be constructed, maintained and operated in accordance with the approved archaeological compensation and enhancement strategy."</p> <p>The Secretary of State would be grateful if the <b>Applicant, CADW, the Gwynedd Archaeological Planning Service</b> and <b>Gwynedd Council</b> could provide any further comments on the acceptability of the potential effects of the proposed Development on the historic environment and the suitability of the possible Requirement outlined above.</p>	
<b>3. Code of Construction Practice and Heavy goods Vehicles Movements</b>			
3.1.	Applicant, Gwynedd Council & NRW	<p>The Secretary of State is considering whether it would be appropriate, in any development consent order that he might issue, to make changes to the Applicant`s proposed development consent order by amending the proposed Requirement 6 dealing with the above matter by the inclusion of the following:</p> <p>(1) "The CoCP required under sub-paragraph (1) must include provision to ensure that the underground excavation of Works 2 is to progress in the direction from Work 3A to Work 1A.</p> <p>(2) The construction traffic management plan required under sub-paragraph (2) must include provision to ensure that the total number of heavy goods vehicle movements during construction is restricted to the maximum projected number detailed in the environmental statement in:</p> <p>(a) tables 12-13 to 12-16 for movements along Ffordd Cefn Du to and from Work Nos 1A, 1B, 1C, 1D, 1E, 1F, 1G and 1H;</p> <p>(b) tables 12-17 to 12-21 for movements, none of which are to be along Ffordd Cefn Du, to and from Work Nos 2, 3A, 3B, 4A, 4B, 4C and 4D; and</p> <p>(c) table 12-22 for movements to and from Work Nos 4E and 4F.</p> <p>(3) The habitat management plan required under sub-paragraph (2) must include:</p> <p>(a) pre-commencement surveys for floating water-plantain to be</p>	<p><u>Penstock Construction</u></p> <p>The suggestion of limiting the construction of the penstock in the manner suggested is entirely new and was not substantially raised in or commented upon in the Examination. The Applicant is greatly concerned that it is now being raised in this manner and is unclear on the concern which this restriction is designed to address. The proposed restriction could have serious consequences for the proposed development.</p> <p>The Applicant strongly objects to the limitation on the method of construction of the penstock. Restricting the work on the penstock to one end limits the ability of the principal contractor to determine the most appropriate construction methods and programme. The precise method of construction of this work has yet to be finalised however if it is drill and blast the penstock may be formed from both ends; restricting these works to one direction will substantially increase the time needed, lengthening the construction period and therefore the period during which construction phase impacts occur. <b>Such a restriction is entirely at odds with the proposed development set out in the application and is fundamentally unacceptable.</b></p> <p>It is unlikely to be practical to form the penstock with elements of it being delivered from the Q6 end only. The proposed (2)(b) would prohibit penstock components such as drilling equipment, concrete lining or conveyor elements</p>

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		<p><i>undertaken in Llyn Padarn in the vicinity of the spillway infrastructure; and</i></p> <p><i>(b) pre-commencement surveys to be undertaken for tree roosting bats; and</i></p> <p><i>(c) details of the process for responding to the findings of pre-commencement surveys, including the submission and approval of necessary mitigation measures before development commences.</i></p> <p><i>(4) Subject to the provisions of requirement 21, all construction works for the authorised development must be carried out in accordance with the approved CoCP, including any plans approved as part of it."</i></p> <p>The Secretary of State considers that such a change would:</p> <p>(i) secure that underground excavation of the penstock (Work 2) would progress in the direction from the lower reservoir (Work 3A) towards the upper reservoir (Work 1A) - '1' above;</p> <p>(ii) secure limits to the movements of heavy goods vehicles on access routes during construction; and</p> <p>(iii) secure pre-commencement surveys for floating water plantain in the vicinity of the spillway infrastructure in Llyn Padarn and for tree-roosting bats.</p> <p>The Secretary of State would be grateful for the views of the <b>Applicant, Gwynedd Council</b> and <b>Natural Resources Wales</b> on whether it is appropriate to include the paragraphs as set out above.</p>	<p>being delivered to Q1– this proposal simply does not function in practical construction terms.</p> <p><u>HGV Movements</u></p> <p>The Applicant has previously objected to a proposal to impose limits on vehicle movements. The proposed overall limit suggested is considered to be unnecessary for two reasons:</p> <p>1) It is not considered that a cap on the number of HGV movements is required as the CTMP includes a commitment for the Contractor to monitor all construction traffic movements and share this information with Gwynedd Council. This is included in the CTMP which includes provision that:</p> <ul style="list-style-type: none"> <li>• The Contractor will at all times keep a full and complete record of all vehicle movements into and out of the Construction sites at both Q1 and Q6. These records shall be held for the full duration of the contract and will be made available for inspection by the Local Authority at all times.</li> <li>• The Environmental Manager (EM) will, at regular intervals to be agreed, meet with the Local Authority to discuss the overall traffic movements.</li> <li>• A meeting between the EM and Local Authority will be held quarterly to review the foregoing quarter's vehicle records. Where the figures of actual vehicle exceed the figures outlined in the ES, a strategy will be determined to reduce the overall movements.</li> <li>• The local authority have the ability to call a meeting at any time to review traffic numbers outside of the quarterly review process should they consider it necessary or appropriate to do so.</li> </ul> <p>2) The figures used in these tables are overall figures for the construction of the whole project. Any exceedance of the total figures given would be of overall movements. This would not therefore necessarily address the concern over daily peaks in traffic movements on Ffordd Cefn Du which were the subject of extensive discussion during the Examination. Whereas the approach of control adopted through the CTMP would allow a monitoring and thus a control of daily traffic flows.</p>
<b>4.</b>	<b>Decommissioning Plan</b>		
4.1.	Applicant & Gwynedd Council	<p>The Secretary of State notes that the Welsh Government and others expressed concerns about funding for decommissioning of the proposed Development. The Secretary of State, therefore, is considering in any development consent order that he might issue, whether an addition in the following terms should be made to Requirement 20 (Decommissioning plan) in the version of the Development Consent Order submitted by the Applicant in response to Deadline 9</p>	<p>This issue only received cursory attention during the Examination and the Applicant fails to see how any concern of substance can be considered to lie at the heart of it given the statutory regulation of reservoirs, as well as the decommissioning requirement already included.</p> <p>The quarries which will form the reservoirs have been abandoned and fenced off for over 100 years. The proposed development would put these to productive use</p>

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		<p>submissions along the following lines:</p> <p><i>“(7) An outline decommissioning plan must be submitted before commencement of generation on the authorised development and must:</i></p> <p><i>(a) identify the nature of the decommissioning works to be undertaken;</i></p> <p><i>(b) include the anticipated timetable for implementation of decommissioning; and</i></p> <p><i>(c) demonstrate how the funding for decommissioning is secured.</i></p> <p><i>(8) An updated outline decommissioning plan must be submitted for the approval of the relevant planning authority every 5 years from the date of commencement of generation until the decommissioning plan is submitted under paragraph (1).</i></p> <p><i>(9) The decommissioning plan submitted under paragraph (1) must be substantially in accordance with the latest outline decommissioning plan approved by the relevant planning authority.”</i></p> <p>The Secretary of State would be grateful for views from the <b>Applicant</b> and <b>Gwynedd Council</b> on his proposed amendment.</p> <p>including making safe currently unstable faces and removing any unexploded ordnance. The Reservoirs Act will apply to these reservoirs as they would to any reservoir and this development should not be treated differently to other reservoir development.</p> <p>The Reservoirs Act 1975 requires decommissioning plans to be certified for “discontinuance”, whereby reservoirs are altered at the time of decommissioning to make them safe and no longer capable of impounding water per the recommendations of a Panel Engineer. Until certified as “discontinued”, reservoirs remain under the ambit of the Reservoirs Act whether in operational use or not. These criteria to make the reservoirs safe – which will not be known until operational use ceases and the Panel Engineer’s requirements are provided - would have to be included within the decommissioning plan. Under CDM Regulations the design of any works needs to take account of eventual decommissioning and the design will ensure that no features posing particular difficulty will be incorporated in the design.</p> <p>The Applicant notes that while the anticipated operational life of the development is given as 125 years and decommissioning is assessed and provided for, the consent sought is not time limited. There is no requirement making this consent temporary.</p> <p>The Applicant considers that any outline decommissioning plan prepared at this stage would be very high level and could not possibly anticipate the relevant standards applicable and technologies available in 125 years. A five yearly update of a plan which is not intended to be actioned for 25 iterations represents an unnecessary administrative burden on both the Applicant and the planning authority for little useful purpose. The Applicant would be happy to submit an initial outline plan but considers that the updating required is too onerous in comparison to the benefit that would be gained.</p> <p>Decommissioning of the development would consist of emptying the reservoirs to a level agreed with the Panel Engineer (which will require the appropriate environment permits to discharge the water, which permits will be subject to appropriate conditions), removing the turbines and buildings and alteration of the dams to a stable residual structure that is incapable of impounding water above the natural ground level or other safe level as may be determined. The cost of these works may be significant but any obligation to secure this for 125 years would become a major financial burden on the applicant which would be entirely disproportionate to the level of costs concerned.</p> <p>Should the Secretary of State consider that the outline and update plans are necessary the Applicant strongly requests that the wording of 7(c) is amended. Taken with common practice on wind farm consents the wording “demonstrate how the funding for decommissioning is secured” could be read as requiring a financial guarantee mechanism to be put in place. <b>Given the operational life of the development this would represent an unreasonable financial burden.</b> The Applicant accordingly requests that where the suggested clauses are inserted this wording is deleted and replaced with: “explains how the costs of delivering</p>

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		the decommissioning plan will be met".
<b>5.</b>	<b>Crown Interests</b>	
5.1.	Ministry of Defence	<p>The Secretary of State notes that the Applicant seeks the compulsory acquisition of any unknown ownership interests in the subsoil (to permit the installation, operation and maintenance of underground pipes) in two plots referred to in the Book of Reference as plots 4 and 7 in which the Secretary of State for Defence is identified as having an interest. The Secretary of State would be grateful if the <b>Ministry of Defence</b> could indicate whether its consent under section 135(1) of the Planning Act 2008 has been granted in respect of Plots 4 and 7.</p> <p>The Applicant acknowledges that although the Ministry of Defence has been consulted at the appropriate stages throughout the application process the specific consent of the Ministry of Defence to compulsory acquisition of the unknown interest in plots 4 and 7 has not been obtained. The Applicant considers that it is unlikely that the consent of the Ministry of Defence can be timeously obtained to allow the DCO to include powers of acquisition for plots 4 and 7, even though it is inherently uncontroversial for the reasons indicated below.</p> <p>It is noted that the scope of Crown Land under the legislation is very wide; in this case the interest which the Ministry of Defence has is the benefit of a reserved right that neither the property or any part shall be used for any noisy, noxious or offensive trade of business or for any purpose which may be or become a nuisance or annoyance to the owners of the occupiers of the adjoining lands. The Applicant did not propose to acquire or delete that right and does not consider that the proposed development will in any way infringe upon or offend against that right. It is however acknowledged that Section 135 applies and that in the absence of formal consent the Secretary of State cannot grant the powers of compulsory acquisition sought.</p> <p>Plots 4 and 7 are the subsoil of a public highway. The land either side of the highway is owned by Gwynedd Council. The normal legal presumption of the ownership of adjoining owners to the mid-line of the highway applies and there is no reason to believe that ownership has been separated from the adjoining land. These interests were included within the scope of compulsory acquisition as a precaution to address any unknown interest. These plots were initially included within compulsory acquisition when a much greater extent of land in various ownerships had to be acquired and it accordingly was expedient in the interests of risk minimisation to include these interests. It is unlikely that the Applicant would have sought compulsory acquisition had plots 4 and 7 been the only land for which such powers were required. All of the other land required to carry out the proposed development has been acquired through voluntary agreements, and removed from the scope of compulsory acquisition powers as part of those agreements. At the stage of removing the last other plot from the scope of compulsory acquisition the Applicant gave serious consideration to removing plots 4 and 7 and not requesting any powers of compulsory acquisition. These powers were retained simply as a risk minimisation measure.</p> <p>Gwynedd Council have concluded a suitable option agreement with the Applicant to allow the necessary rights for installation of the pipes so far as their interest is concerned. If the DCO is granted, the Applicant also has the necessary powers under the DCO to install apparatus.</p> <p>In the circumstances and given the extremely low risk that there is an unknown interest and that the Applicant considers that the risk is mitigated by the ability to place apparatus in or under public highways, the Applicant would request that in</p>

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			the absence of the necessary consent under Section 135 the powers of compulsory purchase sought in the DCO are deleted. This will avoid any delay which might otherwise be caused by seeking the consent of the Ministry of Defence.
<b>6.</b>	<b>Access Land</b>		
6.1.	Applicant	The Secretary of State notes that mitigation access land is identified as 'Countryside Rights of Way Mitigation Land (68.8 acres)' in Figure 4 of the Common, Access Land and Public Rights of Way Strategy` submitted by the <b>Applicant</b> . The Secretary of State would be grateful if the <b>Applicant</b> could indicate whether the designation of the mitigation access land under section 16 of the Countryside and Rights of Way Act has been secured.	The Applicant has secured the necessary land rights to designate this land in due course. The land will not be designated unless and until the commons consent under section 16 of the Commons Act 2006 is granted by the Welsh Ministers. Until such consent is granted there is no impact on access land to be mitigated. It is premature to designate this land ahead of the consideration of the commons application which will include the necessity for and suitability of the mitigation land.
<b>7.</b>	<b>Protective Provisions</b>		
7.1.	Applicant	The Secretary of State notes that the Applicant and SP Manweb were discussing the terms of any protective provisions to be included in any DCO that the Secretary of State might make at the conclusion of the Examination. The Secretary of State would be grateful if the <b>Applicant</b> could indicate whether agreement between the parties has been reached or, in the event it has not, whether there is a timeline for reaching such agreement.	The Applicant has reached agreement with SP Manweb that the standard protective provisions grant SP Manweb adequate protection. No further discussions on bespoke protective provisions for SP Manweb are therefore required with regard to the DCO.
<b>8.</b>	<b>Other Legal Agreements</b>		
8.1.	Applicant, Gwynedd Council & NRW	<p>The Secretary of State notes that an application has been made to Gwynedd Council for agreement under section 278 of the Highways Act 1980 for highway improvement works to Ffordd Cefn Du. The Secretary of State would be grateful for any update from the <b>Applicant</b> and <b>Gwynedd Council</b> on this matter. If the agreement has not been made, he requests those parties` views on whether the matter should be secured through a requirement in any DCO that he might make and, if so, on the wording of such a requirement.</p> <p>The Secretary of State notes that the Applicant proposes to discharge excess water from Quarry Q1 into the Nant-y-Betws surface water body which is connected to the Afon Gwyrfai and Llyn Cwellyn Special Area of Conservation and has applied to Natural Resources Wales ("NRW") for an Environmental Permit for such discharges. The Secretary of State would be grateful for an update from the <b>Applicant</b> and <b>Natural Resources Wales</b> on the status of the permit application.</p>	<p><u>Section 278</u></p> <p>The Applicant can advise that the application previously made to Gwynedd Council for agreement under section 278 of the Highways Act 1980 for highway improvement works to Ffordd Cefn Du is progressing.</p> <p>The Applicant has coordinated with Gwynedd Council and they have confirmed that there is no reason why the agreement cannot be completed before the determination of the DCO and therefore the matter should not need to be secured through a requirement in any DCO that the Secretary of State for Business, Energy and Industrial Strategy might make.</p> <p><u>Environmental Permits</u></p> <p>As of the 06/01/2017, Environmental Permits to discharge water from the site (both during construction and operation of The Development) have been issued by NRW to the Applicant. This includes discharge of water from Q1 to the Nant y Betws, and discharge of water from Q6 to Llyn Padarn. The Environmental permit numbers are EPR-AB3392CJ for the construction phase and EPR-AB3392FB for operation.</p>