

Ein cyf/Our ref: CAS-239552-Z0K0
Eich cyf/Your ref: EN010072

The Glyn Rhonwy Case Team
The Planning Inspectorate
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Date: 10 November 2023

Dear Sir/Madam,

PROPOSAL: Non-material change to the time limit for commencing construction by amending Requirement 2 of Part 2 of Schedule 1 to the Order due to unprecedented increases in construction costs associated with post Covid inflationary factors, and ongoing work on energy policy for support of Large-scale Long-duration Energy storage. The time limit for commencing construction stated in Requirement 2 of the Order is 29 March 2024. The proposed non-material change is to extend this time limit by 2 years so that the deadline for commencing construction will be 29 March 2026

LOCATION: Glyn Rhonwy Pumped Storage (Generating Station), Llanberis, LL55 4EL

We refer to the applicant's notice under section 153 of the Planning Act 2008 and Regulation 6 of the Infrastructure Planning (Changes to, and Revocation of, Development Consent Orders) Regulations 2011, for proposed non-material change to extend the time limit by 2 years so that the deadline for commencing construction will be 29 March 2026, which we received on the 5th October 2023.

We advise that you should seek further information from the applicant regarding protected sites.

Protected Sites

Non-Material Amendment Environmental Appraisal, WSP, Report Ref: Our Ref. No. 62280574 NMA, September 2023

Appendix B - Final Pre-construction water quality monitoring report Table C4

We advise that the applicant clarify some of the Ammoniacal Nitrogen unit results.

Within the table C4 within "Appendix A 3 Q6 2015 Water Quality Results", the Ammoniacal Nitrogen LOD, or Level of Detection in this table is 15. We advise that the applicant confirms whether the value is in mg/l or ug/l? There is a column for EQS which quotes mg/l, which may indicate the LOD may refer to mg/l. 15mg/l as an LOD for a pond is very high, or it may

be ug/l? – which would be a significant difference. For the majority of the samples, the results are below this LOD. But on 3 occasions the results are much higher at 97, 160 and 180. We advise that the applicant confirms what the Ammoniacal Nitrogen as N unit is.

Habitats Regulations Assessment 2023 Review

We acknowledge and agree with the conclusions of the Habitats Regulations Assessment 2023 Review, WSP, Project no. 62280574, Our Ref. No. HRA_0.1, September 2023. However, the document states that *Elodea nuttallii* is present in Llyn Padarn. The document needs to be updated to reflect that *Lagarosiphon major* is now also present and well established in Llyn Padarn. This may be a possible risk to the Afon Gwyrfa a Llyn Cwellyn SAC, a receptor to one of the discharges from the proposed scheme. We advise that this should be recorded for purposes of Biosecurity baselines / planning etc, and to inform any further mitigation plans or measures.

Flood Risk

We note the content of page 7 (Flood Risk (Chapter 10) and page 14 refers to the updated TAN15. We advise that we have published updated maps which are used for development planning purposes, as the Development Advice Maps accompanying TAN15: Development and Flood Risk have not been updated since 2020 and will no longer be updated. The new maps are referred to as the Flood Map for Planning ([Natural Resources Wales / Flood Map for Planning / Development Advice Map](#)).

We do however note the authors comments in that “...*Notwithstanding the changes, it is considered that the existing measures secured through the DCO remain valid and appropriate....*”.

The updated Water Management Plan will need to consider flood risk from groundwater flooding, pluvial flooding and flooding from existing drainage and the Lead Local Flood Authority (Gwynedd Council in this instance) are better placed to advise on managing these sources of flood risk during the construction and operation of the pumped storage scheme.

It is noted from the S.I. (Order) that the proposal is subject to the requirements of the Reservoirs Act 1975.

European Protected Species

We note that the species surveys supporting the Order in 2017 will now be seven years old. However, given that further surveys will be required as part of the Habitat Management Plan, under Schedule 1, Part 2, Requirement 6 (7), we are satisfied that suitable mitigation still exists within the Order.

We note that the requirements relating to protected species included within the original Order(made 8th March 2017) will be retained, we are therefore satisfied that the non-material change will not affect protected species.

Water Resources

We note pages 6 and 7 of the Environmental Appraisal Document and would agree with the conclusions i.e., that no new or different likely water resources significant effects will occur as a result of the time extension.

If you have any queries on the above, please do not hesitate to contact us.

Yours faithfully,

Gareth Thomas

Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning

Cyfoeth Naturiol Cymru/Natural Resources Wales

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Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi./Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.