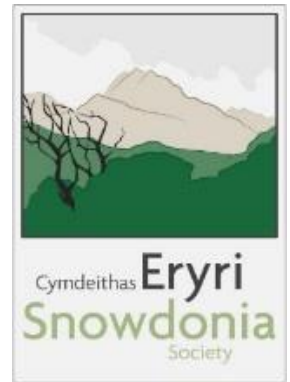


Mr Stuart Cowperthwaite  
Examining Authority  
Glyn Rhonwy Pumped Storage Case Team  
3/18 Eagle Wing  
The Planning Inspectorate  
Temple Quay House  
Temple Quay  
Bristol  
BS1 6PN  
[GlynRhonwy@pins.gsi.gov.uk](mailto:GlynRhonwy@pins.gsi.gov.uk)

Yr Hen Ysgol  
Brynrefail  
Caernarfon  
Gwynedd  
LL55 3NR

☎ 01286 685498  
[director@snowdonia-society.org.uk](mailto:director@snowdonia-society.org.uk)  
[www.snowdonia-society.org.uk](http://www.snowdonia-society.org.uk)



24<sup>th</sup> May 2016

**Deadline 4 submission- DCO Examination: Glyn Rhonwy Pumped Storage EN010072**  
**Interested Party Ref: 10031956**

Dear Mr Cowperthwaite

I write on behalf of Cymdeithas Eryri the Snowdonia Society, the charity which since 1967 has worked to protect, enhance, and celebrate Snowdonia.

Thank you for the opportunity to speak at the Issue Specific Hearing on 17<sup>th</sup> May 2016. This submission covers our response to specific action points noted on the day and follows up on some issues discussed at the hearing.

**Action points arising from the Issue Specific Hearing held on 17 May 2016**

Action No. 11 - John Harold: *Provide a copy of the Snowdonia Society's 10<sup>th</sup> March letter to the applicant regarding the grid connection.*

A copy of the letter is attached as Appendix A to this submission. Cross-checking the eight questions (labelled *i-viii*) in our letter of 10<sup>th</sup> March with the applicant's consultation summary<sup>1</sup> on this subject reveals that none of the questions have been answered.

SPH document *7.01 Grid Connection Statement ISSUED*, dated October 2015, confirms that it is 'a statement of who will be responsible for designing and building the connection to the UK's electricity network' and restates that the connection does not form part of the DCO application. It does not provide answers to any of the questions surrounding what happens if the Distribution Network Operator (DNO) decides for reasons of cost or technical feasibility to bring forward alternative types of connection other than undergrounding.

The applicant did not provide further substance in response to your questions 4.1 and 4.2 about grid connection options during the issue-specific hearing on 17<sup>th</sup> May 2016.

We note the Statement of Common Ground (SPH document SPH-GREX-SCG-03 ) between the applicant and Snowdonia National Park Authority. Under D10 SNPA state that they have

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<sup>1</sup> SPH document: 5.01 Consultation Report ISSUED pages 91-92, dated October 2015

not considered the following issue: *'...that the cumulative assessment adequately assesses the grid connection and that the Developer has committed to underground cables'*. The developer may be 'committed' to underground cables, but it is the DNO's who will ultimately dictate the connection type. The second statement at D10, to which SNPA does agree, refers solely to the 'development' and therefore excludes the grid connection. We suggest and hope (perhaps against expectation) that SNPA would have a view on an overground grid connection.

The applicant has met with Horizon to discuss cumulative impacts.

The applicant's position in variously-worded statements is that undergrounding is the preferred option or the option currently being developed and discussed with the DNO (SP Manweb). The applicant has not taken any of the opportunities available to rule out the possibility that an overground connection might prove to be the final option, choosing instead to rely on the 'protection' of associated development. Opportunities to provide clarity and information which might allay the fears of local people have been missed on more than one occasion.

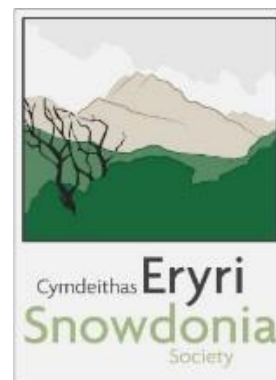
Assessment of inter-project and intra-project cumulative impacts should be based on a worst-case scenario which is relevant to the project and its potential impacts. The alternative to undergrounding is an overground or part-overground connection with pylons. In terms of long-term landscape and visual impacts this is clearly a worse scenario than undergrounding.

We conclude that the applicant's ES is flawed and inadequate in its assessment of cumulative inter- and intra-project impacts associated with the grid connection. It is based on an assumption which the applicant has not justified to the degree of certainty required given the significance of the potential impacts.

## APPENDIX A: Snowdonia Society response to SPH public consultation.

To: Snowdonia Pumped Hydro  
SPH Glyn Rhonwy Consultation  
GVA  
One Kingsway  
Cardiff  
CF10 3AN

Yr Hen Ysgol  
Brynrefail  
Caernarfon  
Gwynedd  
LL55 3NR



☎ 01286 685498  
director@snowdonia-society.org.uk  
www.snowdonia-society.org.uk

10<sup>th</sup> March 2015

### Glyn Rhonwy Pumped Storage Consultation Response from Cymdeithas Eryri the Snowdonia Society

I write on behalf of Cymdeithas Eryri the Snowdonia Society to give our response to the consultation on the Snowdonia Pumped Hydro (SPH) proposed pumped storage hydro scheme at Glyn Rhonwy. The Snowdonia Society is a member-based charity which since 1967 has worked to protect, enhance and celebrate Snowdonia and its National Park.

The following points deal with the connection of the proposed new development to the electricity distribution network and are of specific concern to us. The landscape of northern Snowdonia, views of the Glyderau and the Snowdon massif from the north, and the position of Llanberis and Llyn Padarn at the gateway to Snowdonia National Park – these are all features of immense value at local, regional, national, and international levels.

We would appreciate a clear response to the following points.

Para 4.13.8 of the Draft Environmental Statement Vol 1 Non-Technical Summary states:

*“As the electrical connection will be underground, it is unlikely that there will be any significant adverse effects on the surrounding landscape.”*

However, on page 5 of the Consultation Overview Report it is stated that:

*“The development will be connected to the electricity distribution network via a new electrical connection. This will be exported from an onsite substation to an offsite substation near Pentir. The consenting of the electrical connection is the responsibility of the District Network Operator, SP Manweb. SPH expects the connection to be provided underground.”*

...and in correspondence (Sarah Nixon, Project Developer, Snowdonia Pumped Hydro, by email dated 19<sup>th</sup> February 2015) that:

*“With respect to the grid connection, unfortunately I am unable to confirm how the power station will be connected to the electricity grid system. The grid connection does not form part of our planning application. In Wales the grid connection is considered to be 'Associated Development' under the Planning Act 2008 and the responsibility of designing and consenting the connection lies with the District Network Operator (SP Manweb). Snowdonia Pumped Hydro expects this connection to be provided underground and this is the current offer being discussed with SP Manweb.”*

Clearly a great deal of work has gone into developing and designing the proposal for the Glyn Rhonwy site, and yet this fundamental matter remains entirely opaque. This is a cause of grave concern.

We would therefore appreciate responses to the following points:

- i.* Given the conflicting statements in your consultation documents and correspondence, can you state **whether SPH has made any assessment of the likely landscape impacts of grid connection options other than undergrounding?**
- ii.* If the answer to point *i.* is ‘Yes’, will those impact assessments be made available to the local community, and if so when?
- iii.* If the answer to point *i.* is ‘No’, can you explain why not?
- iv.* Does SPH consider it acceptable (as opposed to procedural) to wash its hands of the question of how the grid connection is to be made? We ask this in the light of the fact that this aspect of the development will have by far the greatest impact on the landscape and on the world-famous iconic views into the National Park and towards Snowdon itself?
- v.* Will SPH make available to the local community evidence which demonstrates that an underground connection is **the** only offer which has been discussed with SP Manweb?
- vi.* Will SPH provide to the local community a non-technical explanation of how the decision to progress a specific connection method will be made, including how cost considerations will influence the decision?
- vii.* Will SPH undertake to inform the local community immediately and fully if at any stage the discussion with SP Manweb includes any option other than undergrounding of the connection?
- viii.* If, after exhausting other options, an overground connection with new pylons becomes the most likely option, will SPH undertake to abandon its application for a Development Consent Order, in the interest of protecting some of the most

important landscapes and views which Wales possesses and upon which much of the local economy depends?

Yours,



John Harold  
Director, Cymdeithas Eryri the Snowdonia Society