

Mr Greg Parker
Llandysul a Phont Tyweli Ymlaen Cyf

Ein cyf/Our ref: WA/062/0002/006

Dyddiad/Date: 16th October 2014

By e-mail

Dear Mr Parker,

Water Resources Act 1991, as amended by the Water Act 2003 and the Environment Act 1995

Proposal to abstract and impound water at National Grid Reference SN 40818 40315 for hydro-electric power (HEP) production purposes – Llandysul Community Scheme.

We have had the opportunity of considering your pre-application for the above proposed scheme submitted on 12 September 2014 and offer the following comments.

There are a number of technical aspects with regard to the operation of the Gravitation Water Vortex Power Plant (GWVPP) on which we remain unclear. Notwithstanding these uncertainties, we have some fundamental concerns about the scheme which would lead us to advise you to not submit a formal application.

Our main areas of concern relate to the proposed weir and the in-river construction, and the potential impacts of these on flooding and the designated sites and species of the Afon Teifi; as you know, the Teifi is designated as both a Special Area of Conservation (SAC) and a Site of Special Scientific Interest (SSSI). While development is permitted within these designated sites, we cannot allow the habitats and species protected by these designations to be impacted by a development.

We explained in our response and meeting last year that a proposal to create a new weir within the Teifi SAC would be unlikely to be acceptable. The reason for this is because constructing any type of weir in the river could create a physical barrier to fish migration and would alter the local flow conditions. Such changes can have a detrimental impact upon the success with which fish move through this stretch of the river and ultimately reduce the number of migratory fish that reach spawning sites upstream; the Teifi is an internationally important site for salmon and two migratory lamprey species.

Two other notable features of concern are the Multi-fruited River-moss *Dendrocryphaea lamyana* and the Cornish Moneywort *Sibthorpia europaea*.

The Multi-fruited River-moss *Dendrocryphaea lamyana*, is an independent feature of the SSSI designation and a component of the Ranunculion feature of the SAC. It is also specially protected under Schedule 8 of the Wildlife & Countryside Act 1981. The colony located within the gorge at Llandysul is the second largest both on the Teifi and in Wales. This

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Croesewir gohebiaeth yn y Gymraeg a'r Saesneg
Correspondence welcomed in Welsh and English

Dendrocryphaea population is known to extend downstream midway between points 17 and 18 on your map. It grows on rocks and tree bases at a range of heights above water level and will be susceptible to changes in flow levels and flow variability and would potentially be affected by this proposal.

The Cornish Moneywort *Sibthorpia europaea*, is a feature of the Afon Teifi SSSI and occurs in an area of wet flush / spring vegetation on the north bank of the river at the location where it is intended to install the turbines. An installation at this location would result in the loss of this feature, either by physical destruction or by the loss of the flush habitat. The location of the Llandysul bypass was moved downstream at the design stage to avoid this *Sibthorpia* colony. For this reason we would object to any planning application to install the GWVPP at this location.

On the matter of flood risk, there are a number of properties in Llandysul which are already at risk of flooding. The creation of any new weir, and potentially the construction of the GWVPP, would present an increased risk of flooding. Whilst we acknowledge that you propose to install a weir that is capable of being lowered during higher flows, such a structure would not be failsafe and we would need to consider the proposal in a worse case scenario. You would need to demonstrate that there is no third party detriment as a result of your proposal.

In light of the above, we have serious doubts as to the viability of your proposed scheme, so far as you being able to satisfy us that it would provide the required protections and safeguards. In order to be able to address these concerns, if they can be addressed, would need some considerable investment in surveys and these may not guarantee a successful outcome to your application in any event.

If you would like to make an appointment to come to our office in Haverfordwest to further discuss this matter with myself and the relevant technical officers, please let me know and I will be happy to arrange this.

Yours sincerely,



Elizabeth James

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