

Representation by J Gallagher for deadline 5

I wish to refer to pages 85 and 86 of REP3-075.

Table 5.5 Traffic and Transport

The applicant's response refers to further details on monitoring, compliance and enforcement will be include in the finalised CTMP. However, I saw no further details in the updated outline CTMP for deadline 4 (REP4-029). Obviously, I am unaware of whether they are in a further update provided for deadline 5 but their inclusion should be included in the CTMP (together with references to cameras at locations other than the compounds to monitor non-compliance (such as traffic rat-running through the cliff villages rather than adhering to the prescribed routing or breaching the A15/B1202 embargo).

Table 4.2 decommissioning

This application is for temporary use of agricultural land. It is therefore appropriate that considerable weight is given to decommissioning arrangements.

The summary position in table 4.2 is that "assurance must be given that the funds will be available for decommissioning". The applicant's response does not give this assurance.

It is accepted that the applicant, by virtue of its relationship to EDF the French parent, is sufficiently well-resourced to fund decommissioning. However, as has been already raised in previous representations, it is normal business practice for energy projects to be sold on once they no longer meet the organisation's criteria for deployment of capital. I have previously cited the Lindsey refinery in North Lincolnshire as an example where another well-resourced operator (Total of France) sold the asset to a less well funded operator (Praxis) which is now unable to meet its obligations. So, whilst it is accepted that the **applicant** has sufficient funds for decommissioning, the applicant offers no assurance that the **final operator** will have funds to meet its obligations. I wish to reiterate that further assurance is necessary such as completion bond to cover decommissioning costs (potentially coupled with an irrevocable parent company guarantee).