

Ref : EN010072. Comments from interested party C Bartlett.

Decommissioning: complete project decommissioning plan

It is vital that the decommissioning plan covers the possibility of abandonment during construction should the applicant be granted development consent. Abandonment during construction is very likely because:

- The timescales of this project mean that changes in electricity supply could easily be made during the construction period and effectively make this project obsolete. SPH point to two documents *Towards a smart energy system (2016)* and *Smart Power (2016)* to justify their faith in the future of pumped storage. Having read both documents I see only that pumped storage was "... *built several decades ago under a very different system ...*" and that the authors are enthusiastic about new energy storage methods rather than pumped storage. The existing pumped hydro facility at Dinorwig is not used at full capacity now so the demand for electricity from another, very much smaller facility, is by no means guaranteed.
- SPH have never undertaken a project like this and their lack of experience may become ever more apparent as the project starts leading them to abandon it
- Changes in the UK's financial status over the next few years, which will be a period of great upheaval and change in the financial environment, may lead to investors moving away from such a project rendering it financially unviable

The points above, particularly those relating to financial support indicate that the wording proposed by the Secretary of State "The Applicant ... must *demonstrate* how funding for the decommissioning is secured" is entirely appropriate and should not be replaced by the Applicant's wording replacing *demonstrate* with *explain*, as the likelihood is that any such plan may well need to be implemented. The danger for residents near the project is that the Applicant abandons the project during construction and has no financial assets that could be used to implement the decommissioning plan, leaving residents with a hideous blight on their doorsteps and no access to resources to deal with it.

Additional clauses to reflect existing planning permission for Glyn Rhonwy pumped storage facility

It is vital that Condition 53 be included in any new permission awarded, particularly considering the potential that has been clearly identified that ordnance may well be found during tunnelling and excavation operations and must not be deposited in a new slate tip.

Conditions 56 and 57 should also be included going forward to protect the site, particularly if a decommissioning plan is to be implemented.