

02 June 2021

The Planning Inspectorate
National Infrastructure Directorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

By email: [SizewellC@planninginspectorate.gov.uk](mailto: SizewellC@planninginspectorate.gov.uk)

Dear Sirs

**NNB Generation Company (SZC) Limited Application for an Order Granting
Development Consent for The Sizewell C Project (EN010012)**

Deadline 2 Submission on behalf of East Anglia ONE North Limited

1. Responses to the ExA's Written Questions (ExQ1)

We refer to the Planning Inspectorate's Rule 8(3) letter dated 21 April 2021 (the "Rule 8 Letter"). In accordance with the deadlines at Annex A of the Rule 8 Letter, we enclose the Responses to the ExA's Written Questions (ExQ1) on behalf of East Anglia ONE North Limited in response to the 2 June 2021 Deadline within Annex A of this Letter:

2. Written Representation

2.1 Introduction

This Written Representation is submitted by East Anglia ONE North Limited in relation to the Development Consent Order (DCO) application for the proposed Sizewell C Project (PINS ref: EN010012).

East Anglia ONE North Limited is a wholly owned subsidiary of ScottishPower Renewables (UK) Limited (SPR) which in turn is part of the Iberdrola Group, a world leader in clean energy and the leading wind energy producer worldwide. East Anglia ONE North Limited is seeking development consent for the proposed East Anglia ONE North Offshore Windfarm Project (the East Anglia ONE North Project), which is scheduled to conclude Examination on 6 July 2021.

The East Anglia ONE North Project will have an operational capacity of up to 800MW and will include onshore and offshore infrastructure, some of which is in the vicinity of the proposed Sizewell C Project.

2.2 Background

The National Policy Statement for Renewable Energy Infrastructure (EN-3) identifies the need for 25 GW of new offshore wind-derived generating capacity in the UK Renewable Energy Zone (REZ) and the territorial waters of England and Wales. More recently, the UK's

target for installed offshore wind energy has been raised to 40 GW by 2030. As the East Anglia ONE North Project contributes to addressing this need, East Anglia ONE North Limited considers that the delivery of the Sizewell C Project should not adversely impact the construction and/or operation of the East Anglia ONE North Project.

In developing the proposed East Anglia ONE North Project, East Anglia ONE North representatives have engaged proactively with Sizewell C representatives to better understand the scope and impact of the proposed Sizewell C Project and its potential cumulative and in-combination effects, in particular on transport related matters, and we will continue to engage as our projects progress through their respective Examinations and beyond.

East Anglia ONE North Limited attends regular forums which promote collaboration and communication amongst energy project representatives, such as the Suffolk Energy Coast Delivery Board. These forums have proven to be an effective means of communicating and collaborating on our respective projects and we will continue to proactively participate in these forums.

2.3 Onshore Matters

The Order limits for the East Anglia ONE North Project and proposed Sizewell C Project overlap in three areas of the public highway, namely:

- Sizewell Gap (close to the Junction of Sizewell Gap/King George's Avenue);
- Junction of A12/A1094 (Friday Street); and
- Junction of A1094/A1069 (Snape Road).

East Anglia ONE North Limited will continue to liaise with Sizewell C Project representatives in order to understand the nature of the works proposed and explore opportunities for co-ordinating works in these areas which will be to the benefit of the wider community. East Anglia ONE North Limited however must not be hindered from undertaking the necessary works or maintaining the necessary access for the East Anglia ONE North Project as a result of the Sizewell C Project works at these locations, or indeed within the public highway in general, and will seek such assurances during the Sizewell C Project Examination.

2.4 Offshore Matters

Over the course of 2017/2018, when establishing the boundary of the East Anglia ONE North Project's offshore export cable corridor, the latest publicly available information on the Sizewell C Project was referred to, specifically Figure 7.2 of the SZC Stage 2 consultation (published on 23-11-16) which "*shows the main development site in the wider context and includes areas required offshore for cooling water and marine transport infrastructure.*"

The boundary of the East Anglia ONE North offshore export cable corridor, which was presented to the Sizewell C Project by East Anglia ONE North representatives in February 2018, was developed to ensure the following (amongst other matters):

- No interaction of offshore order limits between the Sizewell C Project and the East Anglia ONE North Project;
- An appropriate separation distance from the proposed Sizewell C Project's cooling water intake infrastructure;
- Sufficient flexibility to microsite the offshore export cable to take into account environmental and technical constraints identified during pre-construction surveys; and

- Delivery of the offshore export cable in an efficient and economical way.

The SZC Stage 3 and Stage 4 consultation (published 04-01-19 and 18-07-19 respectively) and the subsequent application for the proposed Sizewell C Project presented a significant increase to the proposed SZC offshore development area from that published within the SZC Stage 2 consultation, to the extent that it now overlaps with the Order limits of the proposed East Anglia ONE North Project.

East Anglia ONE North Limited note that whilst the Sizewell C Project's Work Nos. 2B, 2D and 2F fall outside the East Anglia ONE North Project's Order limits, there remains an overlap in the Order limits. East Anglia ONE North Limited must not be hindered from undertaking the necessary works for the East Anglia ONE North Project as a result of the Sizewell C Project works at these locations and will seek such assurances during the Sizewell C Project Examination.

East Anglia ONE North Limited reserves the right to make further comments through the Sizewell C Project Examination process.

2.5 Protective Provisions

East Anglia ONE North Limited confirms that they are seeking Protective Provisions within the Applicant's DCO to ensure that the construction, operation and maintenance of the Sizewell C Project does not adversely impact the East Anglia ONE North offshore wind farm project..

2.6 Statement of Common Ground

East Anglia ONE North Limited are seeking to enter into a Statement of Common Ground with Sizewell C Project in order to progress the above matters and to provide the opportunity to establish a clear understanding of the interactions between both projects.

2.7 Ongoing Engagement

East Anglia ONE North Limited will continue to liaise with Sizewell C Project representatives in order to seek to resolve the matters outlined above.

Yours faithfully



Richard Morris, Senior Project Manager
East Anglia ONE North Limited

Enclosures

ANNEX A

Responses to the ExA's Written Questions (ExQ1) Published on 21 April 2021

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East Anglia ONE North and East Anglia TWO Offshore Windfarms

East Anglia ONE North Limited and East Anglia TWO Limited's Responses to ExA's WQs for SZC Examination

Document Reference: EA1N_EA2-DWF-ENV-REP-IBR-001085

Date: 2nd June 2021

Revision: Version 1

Author: Royal HaskoningDHV

Revision Summary

Rev	Date	Prepared by	Checked by	Approved by
01	02/06/2021	Paolo Pizzolla	Brian McGrellis	Rich Morris

Description of Revisions

Rev	Page	Section	Description
01	n/a	n/a	Final for submission

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1 Introduction

1. This document has been submitted by East Anglia ONE North Limited and East Anglia TWO Limited to the Sizewell C Projects' Development Consent Order (DCO) examination.
2. This document presents East Anglia ONE North Limited and East Anglia TWO Limited's response to the Examination Authority's (ExA's) written questions (WQs) as part of the Sizewell C (SZC) examination for Deadline 2.

2 East Anglia ONE North Limited and East Anglia TWO Limited's Responses to the ExA's WQs for SZC Examination for Deadline 2

EA1N & EA2's Response	
ID	ExA's Question
Traffic and Transport	
TT.1.34	<p>Transport Assessment (TA) [AS-017] – Cumulative Assessment with EA1 and EA2</p> <p>In the Table 26.2 of Chapter 26 of Environmental Statement (ES) for the East Anglia One North and Two Offshore Windfarm application it is identified that there may be a need for potential structural alterations to the existing bridge on the A12 at Marlesford to facilitate the movement of abnormal load vehicles over this bridge. Has this requirement:</p> <ul style="list-style-type: none"> (i) Been considered as part of the Sizewell C project? (ii) If this was to be required how would construction work impact on traffic flows on the A12 at Marlesford?
	<p>EA1N&EA2 Applicants' Responses to Written Question 2 Volume 8 2.18 Transportation and Traffic - Version 01, Q2.18.17 (East Anglia TWO examination reference REP6-065¹) sets out the traffic management implications should structural intervention at Marlesford Bridge be required as a result of the East Anglia ONE North and East Anglia TWO Projects and concludes:</p> <p><i>“Noting that the bridge span is 6.1m the most likely structural intervention (if required) would be a temporary steel bridge placed over the existing bridge deck. There is potential for this intervention to be implemented under single lane closure, for a period of two days, to avoid the requirement to divert traffic.</i></p> <p><i>The lead in time for a Transformer is between 12 and 24 months enabling advanced notice to be served to all highway stakeholders and a programme to be agreed with SCC to avoid major events. It is therefore concluded that the driver delay impacts of the roadworks would not be significant.”</i></p>

¹ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010078/EN010078-004047-ExA.WQ-2.D6.V1%20EA1N&EA2%20Applicants%20Responses%20to%20WQ2%20Volume%208%202.18%20Transportation%20and%20Traffic.pdf>

EA1N&EA2 Response to ExA's WQs for SZC

ID	ExA's Question	EA1N & EA2's Response
TT.1.62	<p>Transport Assessment (TA) [AS-017] – Cumulative Assessment with EA1N and EA2</p> <p>Is the traffic data input provided used in the modelling of the Scottish Power proposal EA1 and EA2 still the correct current data?</p>	<p>East Anglia ONE North Limited and East Anglia TWO Limited have been provided with a copy of the modelling data used by the Sizewell C project to assess the potential for cumulative impacts with the EA1N and EA2 projects.</p> <p>East Anglia ONE North Limited EA1NL and East Anglia TWO Limited EA2L will review this information and revert.</p>
TT.1.63	<p>Transport Assessment (TA) [AS-017] – Cumulative Assessment with EA1N and EA2</p> <p>Explain:</p> <ul style="list-style-type: none"> (iii) How highway mitigations proposed for this project would be aligned with those proposed by East Anglia One North and Two offshore windfarms; (iv) How any overlap of mitigations proposed would be managed to minimise potential abortive work; (v) How highway works would be coordinated between the projects; and (vi) How the Construction Traffic Management Plans would be aligned and managed to ensure consistent approach to traffic management between all projects and existing highway users. 	<p>EA1N&EA2 Sizewell C Cumulative Impact Assessment Note (Traffic and Transport) - Version 02 (East Anglia TWO examination reference REP6-043²) sets out the cumulative interactions between the East Anglia ONE North, East Anglia TWO and Sizewell C projects.</p> <p>The Statement of Common Ground with NNB Generation Company (SZC) Limited V2, SZC-501 (East Anglia TWO examination reference REP8-112³) confirms:</p> <p><i>“The Applicants and SZC will engage regularly with each other during design and construction of their respective projects so that any interface between the projects can be considered at an early stage, recognising it is in the interests of the Applicants and SZC as well as the wider community that all projects be coordinated as far as reasonably practicable”</i></p>
<p>Cumulative effects with other plans, projects and programmes</p>		

² [https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010078/EN010078-004009-ExA.AS-6.D6.V2%20EA1N&EA2%20Sizewell%20C%20Cumulative%20Impact%20Assessment%20Note%20\(Traffic%20and%20Transport\).pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010078/EN010078-004009-ExA.AS-6.D6.V2%20EA1N&EA2%20Sizewell%20C%20Cumulative%20Impact%20Assessment%20Note%20(Traffic%20and%20Transport).pdf)

³ [https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010078/EN010078-004551-ExA.SocG-18.D8.V2%20EA1N&EA2%20Statement%20of%20Common%20Ground%20with%20NNNB%20Generation%20Company%20\(SZC\)%20Limited.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010078/EN010078-004551-ExA.SocG-18.D8.V2%20EA1N&EA2%20Statement%20of%20Common%20Ground%20with%20NNNB%20Generation%20Company%20(SZC)%20Limited.pdf)

EA1N&EA2 Response to ExA's WQs for SZC

ID	ExA's Question	EA1N & EA2's Response
<p>Cu 1.7</p>	<p>Cumulative effects with other plans, projects and programmes</p> <p>EA 1N [RR-0340] indicates that its representatives have engaged proactively with Sizewell C representatives to better understand the scope and impact of the proposed Sizewell C Project and its potential cumulative and in-combination effects, in particular on transport related matters. Please confirm that such discussions are ongoing and indicate whether any further information is available at this stage in relation to potential cumulative and in-combination effects of the projects with particular regard to transport- related matters</p>	<p>The Statement of Common Ground with NNB Generation Company (SZC) Limited V2, SZC-501 (East Anglia TWO examination reference REP8-112⁴) confirms:</p> <p><i>“The Applicants and SZC will engage regularly with each other during design and construction of their respective projects so that any interface between the projects can be considered at an early stage, recognising it is in the interests of the Applicants and SZC as well as the wider community that all projects be coordinated as far as reasonably practicable”</i></p> <p>EA1N&EA2 Sizewell C Cumulative Impact Assessment Note (Traffic and Transport) - Version 02 (East Anglia TWO examination reference REP6-043⁵) sets out the cumulative interactions between the East Anglia ONE North, East Anglia TWO and Sizewell C projects.</p> <p>East Anglia ONE North Limited and East Anglia TWO Limited are currently engaging with SZC to support the interpretation of the data contained in this submission (see response to TT.1.62).</p>
<p>Cu 1.8</p>	<p>Cumulative effects with other plans, projects and programmes</p> <p>EA 1N [RR-0340] and EA2 [RR-0341] explain that the Order limits for the EA1N Project and the Sizewell C Project overlap in three areas of the public highway, namely: Sizewell Gap (close to the Junction of Sizewell Gap/King George's Avenue); the junction of A12/A1094 (Friday Street); and the junction of A1094/A1069 (Snape</p>	<p>(i) The overlap in Order limits referred to relate to onshore matters. A further overlap occurs offshore. The EA2 and EA1N draft DCOs include protective provision in favour of SZC which requires East Anglia ONE North Limited and East Anglia TWO Limited to consult with SZC Co. in the formulation of the proposed method of working and timing of execution of works, to the extent that it relates to such</p>

⁴ [https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010078/EN010078-004551-ExA.SocG-18.D8.V2%20EA1N&EA2%20Statement%20of%20Common%20Ground%20with%20NNB%20Generation%20Company%20\(SZC\)%20Limited.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010078/EN010078-004551-ExA.SocG-18.D8.V2%20EA1N&EA2%20Statement%20of%20Common%20Ground%20with%20NNB%20Generation%20Company%20(SZC)%20Limited.pdf)

⁵ [https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010078/EN010078-004009-ExA.AS-6.D6.V2%20EA1N&EA2%20Sizewell%20C%20Cumulative%20Impact%20Assessment%20Note%20\(Traffic%20and%20Transport\).pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010078/EN010078-004009-ExA.AS-6.D6.V2%20EA1N&EA2%20Sizewell%20C%20Cumulative%20Impact%20Assessment%20Note%20(Traffic%20and%20Transport).pdf)

EA1N&EA2 Response to ExA’s WQs for SZC

ID	ExA’s Question	EA1N & EA2’s Response
	<p>Road). (i) Please indicate whether any progress has been made in relation to opportunities for coordinating works in these areas and how this would be secured by the DCO(s). (ii) If not, what are the perceived obstacles to any such co-ordination? (iii) Explain the way in which the various works for these schemes in these locations could conflict? ExQ1 : 21 April 2021 Responses due by Deadline 2: 2 June 2021 Page 47 of 60 ExQ1 Question to: Question: (iv) Explain how it is proposed that the necessary access for the EA1 North and EA TWO Projects would be maintained?</p>	<p>overlapping Order Limits. The Applicants seek reciprocal Protective Provisions within the SZC dCO. A separate side agreement may also be required with SZC (depending on the final wording of the Protective Provisions) to address commercially confidential matters such as indemnity levels. Discussions on this matter are at an early stage between SZC and East Anglia ONE North Limited and East Anglia TWO Limited and are continuing.</p> <p>(ii) see response to (i)</p> <p>(iii) Works at Sizewell Gap and the junction of A1094/A1069 (Snape Road) may conflict in terms of SZC and East Anglia ONE North Limited and East Anglia TWO Limited seeking to undertake works at these junctions at the same time, and potentially seeking to undertake similar works. The protective Provisions referred to in (i) above are intended to ensure early engagement between the parties prevents such conflicts. Interaction at the junction of A12/A1094 (Friday Street) are more significant, with SZC proposing the construction of a roundabout and East Anglia ONE North Limited and East Anglia TWO Limited proposing construction of traffic signals at the same junction to mitigate different magnitudes of impacts resultant from the respective projects. However, the protective Provisions referred in (i) above are intended to ensure early engagement between the parties to prevent any conflict and allow for the effective planning of highway works at this junction</p> <p>(iv) Accesses will be maintained by the Applicants until their removal in order to ensure their safe use throughout the construction period. This will involve management of vegetation along the visibility splays, maintenance of signage; and maintenance of the access surface (including any tarmac joint with the highway) as required. As facilitated by the Protective Provisions with the East Anglia ONE North/East Anglia TWO /SZC DCOs, East Anglia TWO Limited, East Anglia ONE North Limited and SZC</p>

EA1N&EA2 Response to ExA's WQs for SZC

ID	ExA's Question	EA1N & EA2's Response
Cu 1.9	<p>Cumulative effects with other plans, projects and programmes</p> <p>ES Volume 10 Project-wide, Cumulative and Transboundary Effects [APP-578], Chapter 4, paragraph 4.4.13, indicates that the construction of EA1N and EA2 could overlap with the construction of the Sizewell C Project. Paragraph 4.14, states that the 'concurrent build' traffic flows have been used, derived from the preliminary environmental information for the EA2 development. (i) Please indicate whether any further information is available at this stage as to the likely timing and duration of the overlap should all these projects be approved. (ii) Please comment on the reliability of the ES assessment given that it has utilised preliminary environmental information and indicate whether this has now been superseded?</p>	<p>Co. must liaise during construction to ensure respective rights of access are not compromised. In practice, where potential conflict arises, it is in the interest of all parties to work together to resolve the potential conflict.</p>
Cu 1.11	<p>Cumulative effects with other plans, projects and programmes</p> <p>ES Volume 10 Project-wide, Cumulative and Transboundary Effects, Chapter 4 Assessment of Cumulative Effects with Other Plans, Projects and Programmes [APP-578], paragraph 4.4.53, explains that the cumulative assessment for Sizewell C with EA1N and EA2 is based on certain worst case assumptions. Please indicate whether those assumptions are agreed between all parties</p>	<p>i) The EA1N&EA2 Sizewell C Cumulative Impact Assessment Note (Traffic and Transport) - Version 02 (East Anglia TWO examination reference REP6-043⁶) sets out the cumulative interactions between the East Anglia ONE North, East Anglia TWO and Sizewell C projects. The note considers a worst case that peak construction phase for the East Anglia ONE North and East Anglia TWO Projects could overlap with the 'early years' construction for SZC in 2023 and also the peak construction for SZC in 2028.</p> <p>ii) East Anglia ONE North Limited and East Anglia TWO Limited have been provided with the modelling data used by the Sizewell C project to assess the potential for cumulative impacts with the EA1N and EA2 projects. East Anglia ONE North Limited and East Anglia TWO Limited will review this information and revert.</p>
Cu 1.11	<p>Cumulative effects with other plans, projects and programmes</p> <p>ES Volume 10 Project-wide, Cumulative and Transboundary Effects, Chapter 4 Assessment of Cumulative Effects with Other Plans, Projects and Programmes [APP-578], paragraph 4.4.53, explains that the cumulative assessment for Sizewell C with EA1N and EA2 is based on certain worst case assumptions. Please indicate whether those assumptions are agreed between all parties</p>	<p>The EA1N&EA2 Sizewell C Cumulative Impact Assessment Note (Traffic and Transport) - Version 02 (East Anglia TWO examination reference REP6-043⁷) sets out the worst case cumulative transport metrics that have been utilised to inform the East Anglia ONE North and East Anglia TWO DCO applications.</p>

⁶ [https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010078/EN010078-004009-ExA.AS-6.D6.V2%20EA1N&EA2%20Sizewell%20C%20Cumulative%20Impact%20Assessment%20Note%20\(Traffic%20and%20Transport\).pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010078/EN010078-004009-ExA.AS-6.D6.V2%20EA1N&EA2%20Sizewell%20C%20Cumulative%20Impact%20Assessment%20Note%20(Traffic%20and%20Transport).pdf)

⁷ [https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010078/EN010078-004009-ExA.AS-6.D6.V2%20EA1N&EA2%20Sizewell%20C%20Cumulative%20Impact%20Assessment%20Note%20\(Traffic%20and%20Transport\).pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010078/EN010078-004009-ExA.AS-6.D6.V2%20EA1N&EA2%20Sizewell%20C%20Cumulative%20Impact%20Assessment%20Note%20(Traffic%20and%20Transport).pdf)

EA1N&EA2 Response to ExA’s WQs for SZC

ID	ExA’s Question	EA1N & EA2’s Response
	and that they comprise a complete list of potential ‘worst case’ factors?	<p>Deadline 8 Submission - East Anglia ONE North and East Anglia TWO Statement of Common Ground with East Suffolk Council and Suffolk County Council - Version 04, LA10.10 (REP8-114⁸) confirms:</p> <p><i>“The approach to assessing cumulative impacts with SZC is acceptable.”</i></p>
Cu 1.13	<p>Cumulative effects with other plans, projects and programmes</p> <p>EA 1N [RR-0340] in relation to offshore matters notes that whilst the Sizewell C Project’s Work Nos. 2B, 2D and 2F fall outside the EA 1N Order limits, there remains an overlap in the Order limits. The company expresses concern that it must not be hindered from undertaking the necessary works for the EA 1N Project as a result of the Sizewell C Project works at these locations. Please indicate the form of assurance sought in this respect and whether this has been provided to the satisfaction of EA 1N?</p>	<p>East Anglia ONE North Limited and East Anglia TWO Limited are seeking Protective Provisions within the SZC dDCO in a reciprocal arrangement to those agreed within the East Anglia ONE North and East Anglia TWO draft DCOs. A separate side agreement may also be required with SZC (depending on the final wording of the Protective Provisions) to address commercially confidential matters such as indemnity levels. Discussions on this matter are at an early stage with SZC and East Anglia ONE North Limited and East Anglia TWO Limited and are continuing.</p>

⁸ https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010077/EN010077-004595-ExA_SoCG-2.D8.V4%20EA1N&EA2%20Statement%20of%20Common%20Ground%20with%20East%20Suffolk%20Council%20and%20Suffolk%20County%20Council.pdf