

The PLANNING INSPECTORATE
Temple Quay House,
Temple Quay,
Bristol
BS1 6PN

27th January 2020

Dear Sirs,

DEVELOPMENT CONSENT ORDER (DCO), SIZEWELL
East Anglia Two (EA2) and East Anglia One North (EA1N) Proposals

Thank you very much for the opportunity to comment on the DCO for the East Anglia Two (EA2) and East Anglia One North (EA1 North) projects. EDF Energy Nuclear Generation Limited (NGL) has an interest in these proposals in its capacity as;

- i) Owner of the land on the north side of Sizewell Gap Road, which is to be used by two of the proposed construction accesses for the installation of the onshore cables for the proposed EA1 North and EA2 Offshore Wind Farms,
- ii) Operator of the nearby Sizewell B nuclear power station (SZB) and,
- iii) One of the companies in the same EDF Group as NNB Generation Company (SZC) Limited ("SZC") in which EDF Energy Limited holds a majority shareholding, whose proposals for Sizewell C nuclear power station (SZC) are at an advanced stage.

This letter covers the response to the submitted DCOs for and on behalf of NGL, which is the owner and operator of SZB nuclear power station. A separate letter covers the response on behalf of SZC. NGL recognises the importance of the SPR off-shore wind proposals and has no objection to the principle of the proposed wind farms and associated off-shore and on-shore infrastructure. However, as SZB is an operating nuclear power station there are a number of important considerations, set out below, which need to be addressed.

Sizewell Gap Road and SZB

Sizewell Gap Road is the access road to SZB nuclear power station for staff and forms the principal emergency access route for emergency services and for mobilisation of assets from the Emergency Response Centre at the railhead in Leiston. Any development making use of Sizewell Gap Road needs therefore to demonstrate that it will not compromise the safe operation of current and future nuclear power generation at Sizewell. This will require careful investigation and NGL approval of the detailed design and implementation of the SPR proposals once these become available. We will therefore need a Protective Provision in this respect.

Emergency Planning

As operator of SZB nuclear power station NGL has responsibilities for emergency planning under the Nuclear Site Licence conditions attached to SZB. NGL has to be sure that any development within the emergency planning zone can be accommodated within the off-site emergency plan. Part of the EA1 North and EA2 onshore proposals fall within the Sizewell Emergency Planning Zone, within which the needs of staff, visitors and residents must be addressed from an emergency planning



point of view. NGL has discussed this matter with SPR and is happy to continue to share the expertise of its emergency planning team.

Operational Impact on Sizewell B Station

NGL needs at all times to be able to demonstrate ongoing compliance with the provisions of the Nuclear Site Licence for SZB. It is of crucial importance that SPR has regard to this requirement in their promotion of EA1 North and EA2 through the DCO process. We will therefore continue to expect SPR to cooperate fully and take on board any concerns we have and make changes to the proposals, where appropriate, to ensure there is no adverse impact on the day-to-day running, security and nuclear safety of SZB.

NGL will continue to expect to have the opportunity to properly consider and comment on, when available, the technical detail of the SPR proposals, with particular reference to the onshore operational assets which are key to the nuclear safety case for SZB. These assets include the access route to SZB (Sizewell Gap Road) and adjacent utilities, the overhead 400kV lines, the Emergency Response Centre and any aspects of the proposed development which could impact on these key assets eg drainage and methods of work.

NGL reserve the right to require Protective Provisions to address the above issues once we have sufficient information on the potential impacts on SZB operations.

National Grid Connections

It will be necessary as part of the National Grid connection process for SPR to provide National Grid with further details about the plant and equipment they are proposing to connect, to ensure that the SZB nuclear safety case is not compromised. Clearance of the associated internal EDF Engineering Change proposals will also be required sufficiently prior to any connection and energisation of new SPR assets to the transmission system.

Offshore Issues

The proposed SPR export cables would pass to the east of the existing SZB and proposed SZC offshore cooling water structures, before crossing the line of the Greater Gabbard and Galloper cables, turning to the west and making landfall to the north of Thorpeness. As a consequence, marine issues previously raised by us (with reference to SZB and SZC) in connection with the Galloper Wind Farm Project are also relevant here, with the added complexity that the Galloper cables are now in situ.

The SPR cable corridor includes within it the majority of the Coraline Crag formation (calcareous sand rock outcrops). In relation to the continued safe operation of SZB, NGL are particularly concerned that the protection afforded to the Sizewell shore by the Coraline Crag between Sizewell and Thorpeness should not be compromised. SPR have been made aware by NGL of the need to avoid potential disturbance to the Coraline Crag and associated seabed morphologies when considering actual cable routes, cable laying methodologies and subsequent maintenance requirements. Protective Provisions should be included in the SPR DCO to ensure that, after SPR have carried out their detailed pre-construction surveys to determine the southern extent of the Coraline Crag formation, this is achieved in practice.

NGL also require that Protective Provisions should be applied in order to protect the quality of the SZB cooling water intake within the "shallow water box/restriction" area.

Protective Provisions

In the interests of nuclear safety and to ensure that the proposed developments do not affect the operation of Sizewell B Power Station, the following general Protective Provision is requested to apply to both the EA1N and EA2 proposals:

“That no processes or activities shall be carried out which would (a) be incompatible with the nuclear safety arrangements or operations of Sizewell B Power Station; or (b) have an adverse effect on water quality at the intakes of Sizewell B Power Station.”

This is in addition to comments above regarding requests for further Protective Provisions.

In Combination Effects

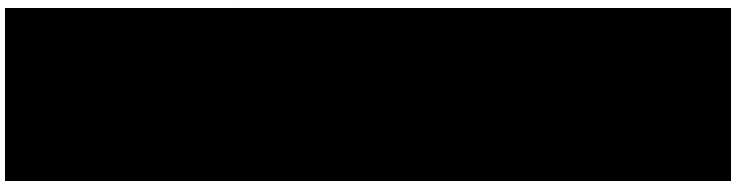
Whilst it is understood that the start dates for EA1 North and EA2 are indicative, it is likely that construction of EA1N and EA2 would coincide not only with the operation of SZB but also the construction phase of SZC. NGL would expect the relevant Environmental Statements to explain the sufficiency of any mitigations required to address any adverse impacts caused by in combination effects. NGL/SZC has had a number of meetings with SPR to exchange environmental information and assist SPR in this regard.

Co-operation

Given the nature of the proposed projects, we hope that SPR will continue to work closely with us and other stakeholders on its more detailed proposals as it is vital that all the developments are coordinated through their respective planning and construction phases.

In principle, we are always be willing to discuss such issues, so long as the important considerations listed above are fully taken into account and we look forward to continuing liaison with SPR as the EA2 and EA1N proposals are refined. However, NGL needs to continue to make a technical objection since SPR's detailed construction proposals are not currently available. This is in order to reserve NGL's position and NGL's right to identify and assess further general and specific issues and resultant requirements and protections based on such further detailed proposals, before NGL is able to withdraw its reasonable technical objection. Given that this is the case any comments made in this letter are subject to further detailed information being provided by SPR in due course.

Yours faithfully,



Jon Yates - Station Director
Sizewell B Power Station