

Planning Inspectorate Temple Quay House Temple Quay Bristol BS1 6PN

2nd November 2020

Application by East Anglia ONE North Ltd for East Anglia ONE North Offshore Wind Farm. EN010077 REF 20024721

Application by East Anglia TWO Ltd for East Anglia TWO Offshore Wind Farm EN010078 REF 20024704

Responses to Examining Authority Written Questions

Dear Sirs

Please find enclosed responses to ExA Questions attached.

In preparing our response it has come to our attention that the Book of Reference may not correctly reflect the affected Owners for Plots 19, 20, 21 and 33. The Order Limits shown on the Land Plans appear to run down the centre of field boundaries with the result that the red colour extends into NGL land interests on the north side of Sizewell Gap Road in relation to Land Parcels 19, 20, 21 and 33. We request the Applicant provides written confirmation as regards the extent of Land Parcels 19, 20, 21 and 33.

Following this confirmation we request that the Land Plans and the Book of Reference are updated to clarify the extent to which EDF Energy Nuclear Generation Limited's land interest is affected.

We also bring to the ExA's attention errors in Additional Submission document AS-037 'Applicant's Comments on Relevant Representations Volume 4: Landowners', which in response to RR-038 (Page 3), lists EDF Nuclear Energy Generation Ltd as having an interest in plot numbers 28, 29, 30, 31, 35, and 39 (in relation to the October 2014 Option Agreement). We understand that EDF NNB Generation Company (SZC) Limited are the beneficiary of this options agreement rather than NGL.

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Pending this clarification we wish to reserve the positon to attend Compulsory Acquisition Hearing (CAH1) on 1 December 2020 and Issue Specific Hearing 2 (ISH2) into Onshore Siting, Design and Construction on 2 and 3 December 2020 on the potential effects of construction work (road closure and utilities) on Sizewell Gap Road for SZB operation (safety, security and emergency plans).

Please acknowledge receipt of this covering letter and our response to the Examination questions.

Yours faithfully,



Robert Gunn Station Director

ExA Question Ref	Respondent	ExA Question	EDF Nuclear Energy Generation Ltd Response
1.5.7	Statutory Undertakers	In respect of powers being sought in order for the applicant to be able construct, operate and maintain the authorised project, are you content with the provision in Art 20 paragraph (5) authorising the applicant to transfer the power to acquire new rights or impose restrictions?	We are continuing discussions with the Applicant to understand the implications of the provisions in the draft order and the extent to which they affect our land.
1.5.8	Statutory Undertakers	Paragraph (5) of Art 21 disapplies Art 21 in respect of statutory undertakers and cites section 138 of the 2008 Act and Art 28 of the dDCO. Art 28 in turn cites Schedule 10 (protective provisions). • Are you satisfied that your interests are adequately protected?	We are continuing discussions with the Applicant to understand the implications of the provisions in the draft order and the extent to which they affect our land. We are not yet in a position to confirm whether or not we are satisfied that our interests are adequately protected.
1.14.2	Office for Nuclear Regulation, SCC, EDF Nuclear Energy Generation Ltd	Interface with Sizewell B Are you content that the ES adequately describes and concludes on any interface effects on the Sizewell B nuclear licensed site operations, including emergency planning and on decommissioning activities? If not, please indicate the additional analysis and actions required.	We have reviewed whether the ES adequately describes and concludes on the following areas of interface with Sizewell B: Traffic Management Table 2.2 of the Construction Traffic Management Plan recognises that Sizewell B nuclear power station operate regular outages, where the numbers of vehicles travelling to and from Sizewell B increases. To reduce the potential for the construction HGV traffic to have an adverse impact upon the highway network during these times, the CTMP commits SPR to, where possible, schedule peak construction activities to avoid these periods and HGV deliveries will be scheduled to avoid the start and end of shifts. EDF Nuclear Energy Generation Ltd require a commitment within the Construction Traffic Management Plan to consultation with and approval from EDF Nuclear Energy Generation Ltd for the traffic management arrangements during planned outages.

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Ref			
			Access Points on the Sizewell Gap Road We understand through engagement on the draft SOCG that an Outline Sizewell Gap Construction Works Method Statement will form part of the Code of Construction Practice under Requirement 22 the draft DCO. At this stage there is no reference in the draft DCO to this requirement. We are currently reviewing this Method Statement with a view to agreeing the extent of works in carriageway of the Sizewell Gap Road and traffic management arrangements to ensure that there is uninterrupted access for all types of vehicles (including cyclists and pedestrians) at all times to reduce the potential impact on access to SZB for both operational and emergency purposes.
			Utilities We request that the applicant confirms whether works have the potential to interrupt services (water, telecommunications, power supply) to SZB and provide the appropriate protective provisions.
			Cooling Water Infrastructure The ES states that consideration has been given to the proximity to the Sizewell nuclear power station cooling water infrastructure with respect to tidal streams. This has led to the preference for a location for cable installation towards the southern side of the cable corridor, and an extension of the original corridor further to the south in order to accommodate this. The proposed HDD method and pop-out location reduces the risk of suspended sediment (during construction) affecting the Sizewell Nuclear Power Station's cooling water infrastructure. No significant impact is reported. We would agree with this assessment but would request inclusion of a commitment in the Order to locate the HDD Punch Out in the area shaded blue and referred to as the "Offshore Zone Suitable for HDD Punch Out" in

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			Figure 7.7 of the ES and amendment to draft Requirement 13 to require consultation with EDF Nuclear Energy Generation on the submission of the Landfall Construction Method Statement for the construction of Work No. 6.
			Flood Risk Cumulative impacts with Sizewell B Power Station Complex were assessed as being not significant. We would agree with this assessment.
			Emergency Planning There is no reference or assessment in the ES of the potential to exacerbate an emergency incident at Sizewell B in the ES, should works to create the new access points on the Sizewell Gap Road impede or prohibit emergency access to Sizewell B. Whilst we welcome the commitment in the draft DCO (Requirement 33) to prepare an Emergency Incident Response Plan, we would ask for further consideration of the potential effects and clear commitment to engage with EDF Nuclear Energy Generation Ltd in developing the Emergency Incident Response Plan. In addition the Applicants must continue to liaise with the Suffolk Joint Emergency Planning Unit to ensure that appropriate updates are made to the Sizewell Off Site Emergency Plan (prepared by the Suffolk Joint Emergency Planning Unit on behalf of Suffolk County Council / Suffolk Resilience Forum) to accommodate the construction, operation and decommissioning of the Projects.

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			Decommissioning Activities There is no reference in either the screening assessment or the assessment of the cumulative effects to the potential for cumulative effects arising from the proposed development and Sizewell B decommissioning activities. We consider it unlikely that there would be cumulative effects arising from decommissioning, as decommissioning activities are not expected to commence before 2035 and therefore there would be no overlap in construction periods.
1.14.4	Office for Nuclear Regulation, SCC, EDF Nuclear Energy Generation Ltd, NNB Generation (SZC)	Interface with nuclear construction, operation and decommissioning at Sizewell Are offshore works prospectively affecting the coraline crag sufficiently clearly described and controlled, given the protection to the Sizewell shore and to the nuclear sites afforded by it? If not, please indicate the additional analysis and actions required.	NGL acknowledge and support the applicant's indication of a "likely punch out area" for their offshore export cables to the south west or south of the visible Coralline Crag formation that is c 3.5km south of the Sizewell B cooling water infrastructure. NGL also acknowledge and support the applicant's intention to install these cables across the shallow sub-tidal and intertidal areas by trenchless technique such as horizontal directional drilling (HDD).
	Ltu		We consider that this is sufficiently controlled in the draft DCO, subject to including a commitment in the Order to locate the HDD Punch Out in the area shaded blue and referred to as the "Offshore Zone Suitable for HDD Punch Out" in Figure 7.7 and amendment to draft Requirement to require consultation EDF Nuclear Energy Generation Ltd on the submission of the Landfall Construction Method Statement for the construction of Work No. 6 under Requirement 13 of the draft Order.