

Planning Inspectorate  
Temple Quay House  
Temple Quay  
Bristol  
BS1 6PN

17th 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**

## **DEADLINE 2 RESPONSES**

Dear Sirs

This letter contains Deadline 2 responses in respect of both of the above proposals from EDF Nuclear Generation Limited (NGL), the owner of the land on the north side of Sizewell Gap Road and the operator of the nearby Sizewell B nuclear power station (SZB). This contains:

- Comments on any additional information/submissions received by Deadline 1 – the Outline Construction Traffic Management Plan, the Outline Sizewell Gap Construction Method Statement, the Outline Access Management Plan, and the Outline Landfall Construction Method Statement.
- Outstanding concerns regarding the Applicant's Land Plans; and
- Comments on Responses to Relevant Representation (RR-038)

## **Outline Construction Traffic Management Plan (OCTMP)**

This is an important document and should be included in the list of certified documents. In addition, Requirement 28 should be updated to reflect that any detailed CTMP should be in accordance with the OCTMP.

The OCTMP identifies 7 onshore construction sections, of which two are of primary interest to NGL (Landfall/Section 1 and Section 2). All construction traffic for these two sections is to use the B1122 from the A12 and Sizewell Gap and Table 2.1 at Para 34 has the resultant forecast HGV movements on Sizewell Gap (115 two-way daily for EA1N or EA2 and 152 two-way daily for EA1N + EA2).

Sizewell Gap Road is the sole access road to SZB nuclear power station for staff and forms the principal access route for emergency services and for mobilization of assets from the Emergency Response Centre at the railhead in Leiston and a number of concerns arise for NGL in relation to the OCTMP:

(i) In combination impacts of existing and proposed HGV movements.

Table 2.2 in Para 49 states that the contractors' CTMPCOs will engage with EDFE to try and avoid peak construction periods during outages and start and end of shifts. It also states that in the event of traffic incidents blocking a highway the contractor "will have arrangements with recovery companies" to clear the highway "as quickly as possible".

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, to ensure that SZB AIL movements do not co-incide with the part closure of SGR and to define more precisely clearance requirements for any blockage of Sizewell Gap Road.

(ii) Damage done to SGR by such HGV movements.

Para 70 in the OCTMP sets out proposed highway asset monitoring – to be done by the contractor (surveys prior to and close to completion of works – to be agreed with SCC) and provisions for repair of highway damage. NGL agree to the need for pre-construction and post-construction surveys along SGR and the need for identified repairs to be undertaken by the Applicant.

### **Outline Sizewell Gap Construction Method Statement (OSGCMS)**

This is an important document and should be included in the list of certified documents. In addition, Requirement 22 should be updated to reflect that the detailed SGCMS should be in accordance with the OSGCMS.

Comments on the OSGCMS are as follows:

(i)  
NGL request the inclusion of a commitment in the OSGCMS to safeguard services that maintain operation of Sizewell B with no interruption. Protective Provisions for these services [Essex & Suffolk Water and British Telecom] must be included in the draft DCO.

(ii)  
NGL request that the OSGCMS should reflect the commitment that prior to construction the Applicant will undertake a physical check via surveys on the location of services within Sizewell Gap Road and the adjacent construction accesses.

(iii)  
NGL request the inclusion within the OSGCMS to regular cleaning of the SGR. SGR highway drains have a history of silting up and this causes flooding in the area of AC1 and AC2.

(iv)  
NGL requests that if emergency repairs are required on SGR the Applicant undertakes these within 24 hours

- (v)  
NGL requests the deletion of para. 35 (page 7). The on-site emergency plan is a matter solely for SZB Power Station.

### **Outline Access Management Plan**

Works to construct the two proposed construction accesses coming off the south side of SGR have the potential to interrupt emergency and operational vehicle access to Sizewell B. NGL request to be consulted on the detailed plans for these arrangements when the detailed plans are submitted for the approval of the Local Planning Authority and the Highway Authority.

### **Outline Landfall Construction Method Statement**

This is an important document and should be included in the list of certified documents. In addition, Requirement 13 should be updated to reflect that the detailed LCMS should be in accordance with the OLCMS.

- (i) NGL are supportive of the proposed use of a trenchless cable laying method at the proposed cable landfall and in the immediate offshore sub-tidal and intertidal areas and that the punch out location should be to the south of the Coralline Crag outcrop as shown on Drg EA1N-EA2-DEV-DRG-IBR-001114?.

The OLCMS commits to conducting offshore surveys with *"a focus on confirming the extent of the Coralline Crag"*.

It is important that a 100m buffer is maintained around the extent of the crag during construction.

The mapped extent of the coralline crag may have changed since the maps used in Figure 7.7 Offshore Cable Corridor and Landfall (APP-109) of the ES.

Up to date geophysical surveys should be undertaken to confirm the current extent of the Coralline Crag formation. This should be a commitment in the OLCMS.

- (ii) The Order limits overlap with the SZB tidally restricted Shallow Water area. A Protective Provision will therefore be required to enforce restrictions on vessel movements in this area (to protect SZB from turbidity).

### **Land Plans**

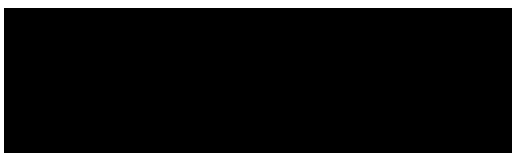
As referred to in our responses to the ExA written questions of 2 November, we remain unclear whether Land Parcels 19, 20, 21 and 33 affect NGL's land interests on the north side of Sizewell Gap Road and request the Applicant's written confirmation as regards the extent of Land Parcels 19, 20, 21 and 33.

### **Comments on Responses to Relevant Representation (RR-038)**

We have no comments to make on the Applicant's responses to RR-038 in so far as matters raised in the relevant representation are subject to ongoing discussion with the applicant which is captured in the draft Statement of Common Ground.

However, in response to RR-002 (East Suffolk Council), RR-011 (Friston Parish Council), and RR-062 (ONR) the Applicant has indicated that an 'Emergency Incident Response Plan' will be submitted under Requirement 33 of the draft DCO. NGL would wish to be consultees on this Plan and request that an Outline Emergency Incident Response Plan is agreed prior to the grant of the DCO.

Yours faithfully,



Robert Gunn  
Station Director