

The Planning Act 2008

East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Farms

Planning Inspectorate Reference: EA1N – EN010077, EA2 – EN010078

Deadline 2 - 17 November 2020

Comments of Suffolk County Council as Emergency Planning Authority

1. Comments on WRs

Not applicable.

2. Comments on responses to RRs

Not applicable.

3. Comments on LIRs

Not applicable.

4. Comments on any SoCG

SoCG between SPR and Officer of Nuclear Regulation

ID	Topic	Statement	EA2 Ltd position	EA1N Ltd position	ONR position	Notes
ONR-005	Interaction with Suffolk Joint Emergency Planning Unit	The Applicants will develop emergency planning measures to respond to an emergency at the Sizewell B Nuclear Power Station and the proposed Sizewell C New Nuclear Power Station (once operational), during the construction and operational period of the Projects. To achieve the above, the Applicants will liaise directly with the Suffolk Joint Emergency Planning Unit to provide necessary information to satisfy the Suffolk Joint Emergency Planning Unit's emergency planning	Agreed	Agreed	Agreed	<p>Just to confirm that ONR need to use the correct organisation when discussing statement of common ground with SPR: The Suffolk JEPU is not a statutory organisation and the correct organisation for discussions under ONR-005 and 006 is Suffolk County Council. The Suffolk JEPU works for Suffolk County Council on matters of radiation emergency preparedness.</p> <p>For the record, the statement in 005 has not been discussed with the County Council and the statement itself is not agreed. The statement infers that the applicant will produce emergency plans during the construction and operational periods of the projects. This is not consistent with the requirements of REPPIR Reg (4)c that requires the County Council to review off site emergency arrangements to take account of new information concerning the response to radiation emergencies. On the basis that SPR construction will generate a change in demographics and response, it would be correct to state that:</p>

		requirements in relation to the Sizewell Off Site Emergency Plan.				<p><i>The Applicants will develop emergency planning measures to respond to an emergency at the Sizewell B Nuclear Power Station and the proposed Sizewell C New Nuclear Power Station (once operational) prior to the construction period of the Projects. To achieve this, the Applicants will liaise directly with the duty holder for offsite radiation emergency arrangements, Suffolk County Council.</i></p> <p>This change also aligns with the 2 DCO conditions that ONR support in ONR-006.</p>
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5. Comments on responses to the ExAs Written Questions (ExQ1)

ExQs 1	Question to:	Question:	1	2	Applicants Response	SCC Comments
1.14	Other Projects and Proposals					
1.14.2	Office of Nuclear Regular (ONR), 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			No response	<p>The ES does not adequately describe the full interface effects with radiation emergency arrangements for SZB made under REPPiR 19 by Suffolk County Council. While reference is made to the aspirations of the applicant emergency response plan in the draft DCO, this is not a replacement for statutory emergency arrangements made under REPPiR or CCA legislation. The ONR comments reflect the relatively low impact on onsite emergency arrangements made by EDF but also reflect the need to agree off site arrangements with the County Council.</p> <p>It is therefore important that the DCO continues to include 2 conditions to safeguard the County Council legal duties under REPPiR and CCA legislation:</p> <ul style="list-style-type: none"> No part of the preparation or construction works shall commence until emergency plans relating to these activities have been agreed and issued. Emergency plans cover the EDF Energy Sizewell B Operators

					<p>emergency plan and the Suffolk County Council Off Site Emergency Plan issued under REPPiR 2019. Wider civil contingency arrangements include Suffolk Resilience Forum emergency plans for identified risks issued under the Civil Contingencies Act 2004 that might affect the Sizewell C main development site and any associated infrastructure.</p> <ul style="list-style-type: none">• The emergency plans shall be carried out as approved in relation to the relevant part of the relevant works, unless otherwise agreed after consultation through the Sizewell Emergency Planning Consultative Committee or Suffolk Resilience Forum as appropriate.
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6. Comments on any additional information/submissions received by Deadline 1

Not applicable.

7. Comments on Post hearing submissions

Not applicable.

8. Responses to any further information requested by the ExA for this deadline

Not applicable.