13 August 2020



East Anglia TWO Case Team The Planning Inspectorate National Infrastructure Planning Temple Quay House 2 The Square Bristol BS1 6PN

Dear Sirs,

East Anglia TWO Limited - The Proposed East Anglia TWO Offshore Windfarm Order, Application Ref. EN010078

East Anglia TWO Limited (the **Applicant**) has had regard to the letter published by the Planning Inspectorate dated 16 July 2020 and wishes to make the following comments:

1. Request for Deadline 2 to be moved back by one week

With respect to the draft Examination Timetable set out in Annex D of the letter, the Applicant requests that Deadline 2 is delayed until Tuesday 24 November 2020. This is to allow sufficient time for the Applicant to prepare responses to written representations that will be received by the Examining Authority on 2 November 2020 and presumably made available to the Applicant within 24 or 48 hours from receipt. As currently drafted, the timetable allows for a period of two weeks to prepare and finalise the comments on written representations for both projects. The Applicant requests the additional time to make sure that the comments are as detailed and helpful as possible.

2. Procedural Decision 18

The Applicant's response to the Examining Authority's questions contained in Procedural Decision 18 can be found in Procedural Decision 18: Applicants' Response (Document reference ExA.AS1.PDA.V1) submitted alongside this letter.

3. Participation at Preliminary Meetings and Hearings

The Applicant confirms that it wishes to attend and participate in the Preliminary Meetings, and all Hearings associated with the Application.

The Applicant would be happy to discuss any of these matters at any of the Preliminary Meetings on 16 September, 17 September (if required), and 6 October 2020.

Applicable to East Anglia TWO

ScottishPower Renewables / 320 St Vincent Street, Glasgow, G2 5AD







In reviewing and commenting on the draft Examination Timetable, the Applicant has assumed that documents submitted at each deadline will be uploaded within 24 or 48 hours of the deadline however if it is anticipated that documents will not be uploaded within these timescales, the Applicant would welcome a further discussion on the draft Examination Timetable at the Preliminary Meetings.

Yours faithfully

Richard Morris Senior Project Manager

East Anglia TWO Limited

Applicable to East Anglia TWO

ScottishPower Renewables / 320 St Vincent Street, Glasgow, G2 5AD





East Anglia ONE North and East Anglia TWO Offshore Windfarms

Procedural Decision 18 Applicants' Responses

Applicants: East Anglia ONE North Limited and East Anglia TWO Limited Document Reference: ExA.AS1.PDA.V1 SPR Reference: EA2_EA1N-DEVWF-ENV-REP-IBR-0001073 Rev 01

Date: 13th August 2020 Revision: Version 01 Author: Royal HaskoningDHV

Applicable to East Anglia ONE North and East Anglia TWO



		Revis	ion Summary	
Rev	Date	Prepared by	Checked by	Approved by
01	13/08/2020	Paolo Pizzolla & Paul Morgan	Lesley Jamieson / Ian Mackay	Rich Morris

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



Table of Contents

1	A) Recent Decisions of Relevance to Habitats Regulations	
	Assessment	1
1.1	Question 1	1
1.2	Question 2	3
1.3	Question 3	4
1.4	Question 4	4
1.5	Question 5	5
2	B) Decision to Accept the Sizewell C Project for Examination	7
2.1	Question 1	7
2.1.1	Conclusion	18
3	References	19



Glossary of Acronyms

AEolAdverse Effect on IntegrityAONBArea of Outstanding Natural BeautyCIACumulative Impact AssessmentDCODevelopment Consent OrderExAExamining AuthorityLBBGLesser black-backed gullLCTLandscape Character TypeLVIALandscape and Visual Impact AssessmentMHWSMean High Water SpringsMMOMarine Management OrganisationNENon-Material ChangeRSPBRoyal Society for the Protection of BirdsSoSSecrteary of StateSPASpecial Protection AreaSZBSizewell BSZCSizewell CWSIWritten Scheme of Investigation			
CIACumulative Impact AssessmentDCODevelopment Consent OrderExAExamining AuthorityLBBGLesser black-backed gullLCTLandscape Character TypeLVIALandscape and Visual Impact AssessmentMHWSMean High Water SpringsMMOMarine Management OrganisationNENatural EnglandNMCNon-Material ChangeRSPBRoyal Society for the Protection of BirdsSoSSecreary of StateSPASpecial Protection AreaSZBSizewell BSZCSizewell CWSIWritten Scheme of Investigation	AEol	Adverse Effect on Integrity	
DCODevelopment Consent OrderExAExamining AuthorityLBBGLesser black-backed gullLCTLandscape Character TypeLVIALandscape and Visual Impact AssessmentMHWSMean High Water SpringsMMOMarine Management OrganisationNENatural EnglandNMCNon-Material ChangeRSPBRoyal Society for the Protection of BirdsSoSSecretary of StateSPASpecial Protection AreaSZBSizewell BSZCSizewell CWSIWritten Scheme of Investigation	AONB	Area of Outstanding Natural Beauty	
ExAExamining AuthorityLBBGLesser black-backed gullLCTLandscape Character TypeLVIALandscape and Visual Impact AssessmentMHWSMean High Water SpringsMMOMarine Management OrganisationNENatural EnglandNMCNon-Material ChangeRSPBRoyal Society for the Protection of BirdsSoSSecrteary of StateSPASpecial Protection AreaSZBSizewell BSZCSizewell CWSIWritten Scheme of Investigation	CIA	Cumulative Impact Assessment	
LBBGLesser black-backed gullLCTLandscape Character TypeLVIALandscape and Visual Impact AssessmentMHWSMean High Water SpringsMMOMarine Management OrganisationNENatural EnglandNMCNon-Material ChangeRSPBRoyal Society for the Protection of BirdsSoSSecrteary of StateSPASpecial Protection AreaSZBSizewell BSZCSizewell CWSIWritten Scheme of Investigation	DCO	Development Consent Order	
LCTLandscape Character TypeLVIALandscape and Visual Impact AssessmentMHWSMean High Water SpringsMMOMarine Management OrganisationNENatural EnglandNMCNon-Material ChangeRSPBRoyal Society for the Protection of BirdsSoSSecrteary of StateSPASpecial Protection AreaSZBSizewell BSZCSizewell CWSIWritten Scheme of Investigation	ExA	Examining Authority	
LVIALandscape and Visual Impact AssessmentMHWSMean High Water SpringsMMOMarine Management OrganisationNENatural EnglandNMCNon-Material ChangeRSPBRoyal Society for the Protection of BirdsSoSSecrteary of StateSPASpecial Protection AreaSZBSizewell BSZCSizewell CWSIWritten Scheme of Investigation	LBBG	Lesser black-backed gull	
MHWSMean High Water SpringsMMOMarine Management OrganisationNENatural EnglandNMCNon-Material ChangeRSPBRoyal Society for the Protection of BirdsSoSSecretary of StateSPASpecial Protection AreaSZBSizewell BSZCSizewell CWSIWritten Scheme of Investigation	LCT	Landscape Character Type	
MMOMarine Management OrganisationNENatural EnglandNMCNon-Material ChangeRSPBRoyal Society for the Protection of BirdsSoSSecrteary of StateSPASpecial Protection AreaSZBSizewell BSZCSizewell CWSIWritten Scheme of Investigation	LVIA	Landscape and Visual Impact Assessment	
NENatural EnglandNMCNon-Material ChangeRSPBRoyal Society for the Protection of BirdsSoSSecrteary of StateSPASpecial Protection AreaSZBSizewell BSZCSizewell CWSIWritten Scheme of Investigation	MHWS	Mean High Water Springs	
NMCNon-Material ChangeRSPBRoyal Society for the Protection of BirdsSoSSecreary of StateSPASpecial Protection AreaSZBSizewell BSZCSizewell CWSIWritten Scheme of Investigation	ММО	Marine Management Organisation	
RSPBRoyal Society for the Protection of BirdsSoSSecreary of StateSPASpecial Protection AreaSZBSizewell BSZCSizewell CWSIWritten Scheme of Investigation	NE		
SoSSecretary of StateSPASpecial Protection AreaSZBSizewell BSZCSizewell CWSIWritten Scheme of Investigation	NMC		
SPA Special Protection Area SZB Sizewell B SZC Sizewell C WSI Written Scheme of Investigation	RSPB	Royal Society for the Protection of Birds	
SZB Sizewell B SZC Sizewell C WSI Written Scheme of Investigation	SoS	Secrteary of State	
SZC Sizewell C WSI Written Scheme of Investigation	SPA	Special Protection Area	
WSI Written Scheme of Investigation	SZB	Sizewell B	
	SZC	Sizewell C	
ZOI Zone of Influence	WSI	Written Scheme of Investigation	
	ZOI	Zone of Influence	



Glossary of Terminology

Applicants	East Anglia TWO Limited and East Anglia ONE North Limited
East Anglia ONE North project	The proposed project consisting of up to 67 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
East Anglia TWO project	The proposed project consisting of up to 75 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
East Anglia ONE North windfarm site	The offshore area within which wind turbines and offshore platforms will be located.
European site	Sites designated for nature conservation under the Habitats Directive and Birds Directive, as defined in regulation 8 of the Conservation of Habitats and Species Regulations 2017 and regulation 18 of the Conservation of Offshore Marine Habitats and Species Regulations 2017. These include candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation and Special Protection Areas.
Natura 2000 site	A site forming part of the network of sites made up of Special Areas of Conservation and Special Protection Areas designated respectively under the Habitats Directive and Birds Directive.



1 A) Recent Decisions of Relevance to Habitats Regulations Assessment

1. This document is applicable to both the East Anglia ONE North and East Anglia TWO applications, and therefore is endorsed with the yellow and blue icon used to identify materially identical documentation in accordance with the Examining Authority's (ExA) procedural decisions on document management of 23rd December 2019. Whilst for completeness of the record this document has been submitted to both Examinations, if it is read for one project submission there is no need to read it again.

1.1 Question 1

- 2. Does the Applicant consider that there is a need to revisit its submitted Information to Support Appropriate Assessment reports in light of the Secretary of State's decisions in respect of the Thanet Extension, Norfolk Vanguard and Hornsea Three projects?
- 3. The Applicants note the Secretary of State's (SoS's) decisions and are in the process of updating / supplementing the relevant areas of the *Information to Support Appropriate Assessment Reports* (APP-043).
- 4. With regard to collision risk issues the Applicants plan to submit updates at Deadline 1. This submission will take account of the recent decisions in respect of the Thanet Extension and Norfolk Vanguard projects and the 'minded to grant letter' in respect of the Hornsea Three project. The Applicants are engaged in ongoing discussion with Natural England (NE) and Royal Society for the Protection of Birds (RSPB) to agree assessment parameters (e.g. apportionment rates for lesser black-backed gull (LBBG)) which are critical to the assessment to be undertaken it is not possible for this information to be submitted at Procedural Deadline A.
- 5. The Applicants consider that the following workstreams will be required to update or supplement the Information to Support Appropriate Assessment Reports:
 - Update of in-combination collision risk assessment
 - Flamborough and Filey Coast Special Protection Area (SPA) for gannet and kittiwake
 - Alde-Ore Estuary SPA for LBBG
- 6. In updating these assessments, the Applicants will:



- Remove Thanet Extension numbers.
- Update the Norfolk Vanguard numbers based upon the final consented position as set out in MacArthur Green (2020).
- Update the Hornsea Three numbers based upon the final position as set out in Hornsea Three (2020).
- Update the Norfolk Boreas numbers based upon the applicant's Deadline 7 position as set out in Norfolk Boreas (2020).
- Include the Hornsea Project Four numbers based upon the Preliminary Environmental Information Report as set out in Orsted (2019).
- 7. At a workshop on the 28th of July 2020 involving the Applicants and representatives from NE, RSPB and the Marine Management Organisation (MMO), NE stated that the in-combination totals used by the SoS for the recent decisions remain uncertain and they have requested clarification on the exact figures used and which projects were included. It is anticipated that this information will be available for the Norfolk Boreas examination (which ends of 12th October with a final deadline on 8th September) and therefore should not delay the Applicants' updates. Understanding of the basis of the SoS decision will allow all parties to move forward with common understanding of the in-combination position.
- 8. The Applicants (which are a subsidiary of ScottishPower Renewables (UK) Limited (SPR)) also wish to bring to the attention of the Examining Authority (ExA) that a non-material change (NMC) application for SPR's East Anglia THREE project was submitted on 20th July 2020 (SPR 2020) and that a NMC application for SPR's East Anglia ONE project is anticipated to be submitted in early 2021¹. If granted, these NMC applications will reduce the in-combination collision mortalities at both the Flamborough and Filey Coast SPA and the Alde-Ore Estuary SPAs from the numbers that were submitted with the East Anglia TWO and East Anglia ONE North project (the Projects) applications.
- 9. Finally, due to more certainty with the procurement process for the East Anglia Hub (which incorporates East Anglia THREE, East Anglia ONE North and East Anglia TWO) the Applicants are able to provide further refinement of the turbine parameters. The Applicants are therefore able to commit to an increased air draught height (from 22 to 24m above Mean High Water Springs (MHWS)) which will reduce each Projects' individual collision risk mortalities for all relevant species.

¹ The East Anglia ONE NMC is simply to bring the consented position in line with the as-built position as that project is now operational. The East Anglia THREE NMC reduces that project's maximum turbine number and increases the air draught of all turbines to 24m above MHWS.



- 10. In summary, addenda to the Information to Support Appropriate Assessment Reports will be provided by the Applicants to incorporate all of the above changes to the project alone and in-combination assessments.
- 11. With regard to displacement of red-throated diver from the Outer Thames Estuary SPA the Applicants plan to submit updates at **Deadline 3**. Note that with regard to Habitats Regulations considerations only the decision on the Thanet Extension is potentially relevant. Actions relevant to red-throated diver are discussed in the response to **Question 4 and Question 5**.
- 12. Both collision risk and displacement issues were discussed at the multi-party workshop on the 28th July 2020. This workshop also included consideration of the programme for updates relevant to Habitats Regulations considerations. Note that despite the willingness of all parties to engage earlier, the delay of the SoS's decisions on Hornsea Three and Norfolk Vanguard together with operational difficulties created by Covid-19 have delayed this process.

1.2 Question 2

13. The ExA notes that at paragraphs 7.3-7.4 of its 'minded to grant' letter for the Hornsea Three project, the Secretary of State states that 'it is...important that potential adverse impacts on the integrity of designated sites are identified during the pre-application period and full consideration is given to the need for derogation of the Habitat Regulations during the examination'. It goes on to encourage the provision of evidence of possible compensatory measures for consideration at the examination on a "without prejudice" basis, where disagreement remains between the Applicant and statutory nature conservation bodies on the existence of significant adverse impacts. This position is echoed in the decision letter for the Norfolk Vanguard project (see paragraphs 5.2-5.3).

Given this context, does the Applicant consider that there is a need for the project before us to secure further mitigation not already provided for within the application or to engage with the derogation tests set out under stages 3 and 4 of the Habitats Directives and Regulations?

14. The Applicants do not consider there to be an Adverse Effect on Integrity (AEoI) on any of the European sites screened into the Habitats Regulations Assessment either at the project alone or in-combination level. However, in recognition of current stakeholder views on these matters (not taking into account any potential changes of position that may result from the updates to assessments referred to elsewhere in this note), the Applicants have been considering potential mitigation options since receiving the Relevant Representations to address collision risk and displacement effects.



- 15. The required extent and feasibility of these measures remains a topic of both internal discussion and more widely with relevant stakeholders and therefore remains under consideration at this time. The Applicants will provide further clarity on any proposed mitigation measures within the updated and supplementary submissions planned to be submitted at **Deadline 1** and **Deadline 3** as indicated in the response to **Question 1**.
- 16. Notwithstanding the Applicants' position that there is no AEoI and recognising stakeholder views that even following the implementation of mitigation, it may not be possible to rule out an AEoI at the Flamborough and Filey Coast SPA, Alde-Ore SPA and Outer Thames Estuary SPA, the Applicants are in the process of investigating potential compensation options for the features of concern. The Applicants have drawn on the ExA's recommendations to the SoS and the SoS decisions on Norfolk Vanguard and Hornsea Three as well as recent strategic efforts in this area e.g. The Crown Estate Derogation Workshop recommendations (DTA Ecology 2020).
- 17. These options will be discussed with NE and the RSPB in a workshop prior to **Deadline 1**. The intention is to set out, on a without prejudice basis, the most appropriate options, from within the suite of potential options identified, and to incorporate these into a draft derogation case to be submitted at **Deadline 3**.
- 18. The Applicants consider this would provide sufficient time for the ExA and other stakeholders to consider the derogation case whilst providing scope for further iteration and refinement by the end of the examination in 2021.

1.3 Question 3

- 19. The Examination of the Norfolk Boreas Offshore Wind Farm application has also progressed in recent months. Does the Applicant consider that any of the evidence submitted to or additional mitigation measures proposed for that project trigger a change to the in-combination assessment for the East Anglia TWO / East Anglia ONE North project?
- 20. As per the response to **Question 1**, the relevant in-combination assessments will be updated to take into account the position presented for Norfolk Boreas at their examination Deadline 7 (Norfolk Boreas 2020).

1.4 Question 4

21. The ExA notes that the Applicant's response to Relevant Representations [AS-036] deferred responding directly to Natural England's suggestions of projectlevel mitigation measures (such as raising turbine draught heights and moving the array area boundary away from SPA boundaries) until after receipt of decisions on the Norfolk Vanguard and Hornsea Three projects. Given that a decision for the former and a 'minded to grant' letter on the latter are now



available, please could the Applicant now respond to these suggested project level mitigation proposed by Natural England in [RR-059]?

- 22. As described in response to **Questions 1 and 2**, the Applicants are currently considering these project-level mitigation measures.
- 23. With regard to collision risk, the Applicants have already taken steps to reduce project alone impacts (through the commitment to raise draught heights to 24m above MHWS which will be reflected in the revised draft Development Consent Order (DCO) to be submitted at **Deadline 3**) and, through the NMCs to East Anglia ONE and East Anglia THREE which reduce the contribution of the SPR projects as a whole to the in-combination totals. As stated above, updated assessments for project alone and in-combination effects (taking into account this mitigation) are anticipated to be submitted at **Deadline 1**.
- 24. With regard to displacement, NE's position on the extent of displacement effects for red-throated diver is more conservative than that stated during the preapplication phase. The suggestion of a 10km buffer from the Outer Thames Estuary SPA to the East Anglia ONE North windfarm site as mitigation would result in a substantial reduction in the array area. The Applicants held a multiparty workshop on the 28th of July with NE, RSPB and the MMO to discuss the evidence for displacement effects and to explore the magnitude of effect and implications for feasible mitigation. The Applicants are now undertaking several workstreams based upon the outcomes of this workshop and aim to hold further discussions with NE, RSPB and the MMO prior to submitting an updated assessment for **Deadline 3**.
- 25. The Applicants also wish to clarify that the deferral of the response to comments on red-throated diver displacement was unrelated to the timing of the SoS's decisions on Norfolk Vanguard and Hornsea Three.

1.5 Question 5

- 26. With a view to starting the Examination in the most up to date position, do the Applicant or Natural England wish to draw any other new information to our attention which may be important and relevant in relation to our consideration of the HRA aspects of this project at this stage?
- 27. With regard to collision risk, the Applicants highlight the changes in project envelopes in respect of the Projects and in respect of other projects such as Norfolk Vanguard and Boreas, Hornsea Three and East Anglia ONE and THREE (as discussed in **Question 1** above which will affect the project alone and incombination mortalities. In response to the Relevant Representations, the Applicants have committed to undertaking population viability analyses (PVA) for kittiwake, LBBG and gannet. In addition, NE has provided updated guidance to



other recent offshore windfarm projects (e.g. Norfolk Boreas) on the apportionment methodology for LBBG which will affect the assessment for that species. The Applicants intend to apply this updated apportionment methodology following agreement with NE on the correct parameters to be used. All of the above will be taken into account and presented in a revised assessment anticipated to be submitted at **Deadline 1**.

28. With regard to displacement of red-throated diver, NE provided further advice to the Applicant in June 2020. In addition, the Applicants have undertaken a thorough review of the evidence for displacement from published sources as well as undertaking a new analysis of displacement from existing offshore windfarms within the Outer Thames Estuary SPA using data provided by NE. These were discussed at the workshop on the 28th July 2020. The Applicants are now undertaking several workstreams based upon the outcomes of this workshop and aim to hold further discussions with NE, RSPB and the MMO prior to submitting an updated assessment for **Deadline 3**.



2 B) Decision to Accept the Sizewell C Project for Examination

2.1 Question 1

- 29. Does the Applicant deem it necessary to update any of the information in its submitted application documents (for example, in relation to cumulative transport, noise or air quality effects, or proposed highway improvements or other mitigation measures) in light of the submitted application documents for the Sizewell C project?
- 30. Following acceptance of the Sizewell C (SZC) DCO application on 24 June 2020, the Applicants have conducted a review of the SZC Cumulative Impact Assessment (CIA) Environmental Statement (ES) chapter (Sizewell C 2020), as well as each topic specific ES chapter, in order to determine whether or not there is a requirement for an updated or supplementary cumulative assessment for any receptor topic assessed within the Projects' applications.
- 31. An initial screening exercise has been undertaken as presented in **Table 1** that highlights the relevant receptor topics that were assessed in the SZC DCO application and identifies whether the Projects were included in the SZC cumulative assessment. In addition, it is noted whether the SZC project-alone assessment conclusions have changed through consideration of the Projects in the SZC cumulative assessment and whether the SZC assessment conclusions align with the Projects' CIA conclusions. The examination of this information has enabled the Applicants to determine if an updated or supplementary assessment is required or if further clarification might be helpful. Where an updated or supplementary assessment or clarification is identified as required in **Table 1**, this will be provided at **Deadline 2**.



Table 1 Summary of the SZC cumulative impact assessment conclusions and the subsequent requirements for the Projects
--

SZC Receptor Topic	Are the Projects included in the SZC CIA?	Does the Sizewell C CIA with the Projects change SZC project alone conclusions?	Considerations of the SZC conclusions with the Projects' CIAs	Is an Updated or Supplementary Assessment Required for the Projects?
Conventional Waste and Material Resources	Yes	No	The Projects' did not assess impacts on conventional waste and material resources given the relatively limited capacity of the Projects to negatively impact on these resources. The topics for the Projects' EIAs were agreed through EIA scoping (SPR 2017).	No
Socio-economics and Tourism	Yes	The SZC project alone assessment concludes potential for significant impacts in respect of socio- economics and tourism, and given the scale of the SZC project these impacts would not increase in significance with the addition of cumulative projects With respect to socio- economics, significant beneficial effects are concluded in the SZC and the Projects' CIAs. With respect to tourism,	The Project CIA assumed that there were likely to be significant impacts for both socio-economic and tourism receptors when the effects of SZC are included.	Although the SZC conclusions are in line with the Projects' CIA conclusions at application, the Applicants will provide a clarification note to highlight where there are differences with newly available information from SZC and why this does not affect the Applicants original conclusions.
		With respect to tourism, there is potential for some		





SZC Receptor Topic	Are the Projects included in the SZC CIA?	Does the Sizewell C CIA with the Projects change SZC project alone conclusions?	Considerations of the SZC conclusions with the Projects' CIAs	Is an Updated or Supplementary Assessment Required for the Projects?
		significant effects on tourism assets at a local level from SZC (individual receptors not identified). There are no changes in the significance cumulatively. For both socio-economics and tourism impacts SZC propose mitigation for significant project alone impacts		
Traffic	Yes	Yes, for the A12 at Little Glemham and Marlesford. there is potential for cumulative moderate adverse effect on fear and intimidation during the peak construction phase with Sizewell C Project and the Projects. The Applicants are in discussion with SZC to obtain and review the raw data used in the SZC assessment.	Due to the complex nature of both the Projects' and SZC's traffic assessments, it is not practical to make direct comparisons between the SZC project alone and the Project's cumulative impact conclusions for each individual receptor. The Projects' CIA conclusions at application deferred full consideration of the effects of SZC until quantitative data on SZC traffic movements became available.	Yes, a supplementary cumulative traffic assessment taking into account SZC will be submitted at Deadline 2 in a traffic and transport clarification note. Given the quantity of data that is required to be interpreted it has not been possible to submit this information at Procedural Deadline A.



_	

SZC Receptor Topic	Are the Projects included in the SZC CIA?	Does the Sizewell C CIA with the Projects change SZC project alone conclusions?	Considerations of the SZC conclusions with the Projects' CIAs	Is an Updated or Supplementary Assessment Required for the Projects?
Noise & Vibration	No, SZC CIA used Zones of Influence (ZOI) to determine if cumulative noise impacts should be assessed. None of the ZOI overlapped with the Projects' construction activities and therefore cumulative construction noise and vibration impacts were screened out. Regarding construction traffic noise assessment, the Projects were included in the baseline for the SZC project- alone assessment	No, for non-transport noise. The SZC CIA determined that there was no overlap in ZOI with the Projects' activities. Whilst the Projects' construction transport movements were considered in the SZC CIA baseline, the SZC CIA only considered construction traffic noise for the SZC rail proposals, two village bypass, Yoxford roundabout and the northern park and ride. The noise ZOI for these activities do not overlap with the Project's activities. As such there was no overlap and there is no change in significance for transport noise.	It was not possible to undertake a quantitative assessment of the cumulative construction phase road traffic noise emissions with SZC for the Projects' DCO applications due to the limited information available at that time. The Projects' CIAs therefore recognised the potential for cumulative impacts. In addition, it was noted that SZC would implement project-specific measures to mitigate noise associated with construction works which would be implemented as part of their CoCP specific for the SZC development. It was therefore not anticipated that any cumulative effects associated with the construction phase (plant) will be significant.	Although the SZC conclusions do not change the Projects' CIA conclusions at application, the Applicants will provide further clarifications to highlight the relevant new information in the context of the original assessment with regards to transport and traffic. Given that this issue is related to traffic and transport, clarification will be provided in the traffic and transport clarification note referred to above.
Air Quality	The Projects were included in the baseline for the SZC project-alone assessment.	Regarding construction dust, the SZC CIA concluded that construction activities from the screened in	Yes, impacts arising from construction phase dust and particulate emissions which	Although the SZC conclusions do not change the Projects' CIA conclusions at application, the Applicants



SZC Receptor Topic	Are the Projects included in the SZC CIA?	Does the Sizewell C CIA with the Projects change SZC project alone conclusions?	Considerations of the SZC conclusions with the Projects' CIAs	Is an Updated or Supplementary Assessment Required for the Projects?
		developments (which included the Projects) was not expected to have the potential to result in cumulative air quality impacts at sensitive receptors, due to their distance and therefore considered the impact to be not significant. The air quality assessment included the Projects' transport movements in the baseline however both project alone and cumulative transport emissions linked to transport movements are concluded to be not significant during all phases.	were concluded as not significant. It was not possible to undertake a quantitative assessment of the cumulative construction phase road traffic emissions with SZC for the Projects' DCO applications due to the limited information available at that time. The Projects' CIAs therefore recognised the potential for cumulative impacts and undertook a qualitative assessment which concluded that cumulative air quality impacts with SZC were unlikely to be significant. This aligns with the SZC cumulative assessment.	will provide further clarifications to highlight the relevant new information in the context of the original assessment with regards to transport and traffic. Given that this issue is related to traffic and transport, clarification will be provided in the traffic and transport clarification note referred to above.
Landscape and Visual Impact Assessment (LVIA)	Yes, cumulative impacts are considered for the area along the Projects' cable route, within the AONB.	The SZC CIA considers that increases in significance of construction impacts at Visual Receptor Groups 18- 20 as a result of the Projects results in medium-term	Yes, regarding the onshore cable route impacts which is where there is potential for cumulative landscape and visual effects, significant effects on the Estate Sandlands Landscape Character type (LCT), the	Although the SZC conclusions do not change the Projects' CIA conclusions at application, the Applicant will provide a clarification note to highlight the relevant new information in the



SZC Receptor Topic	Are the Projects included in the SZC CIA?	Does the Sizewell C CIA with the Projects change SZC project alone conclusions?	Considerations of the SZC conclusions with the Projects' CIAs	Is an Updated or Supplementary Assessment Required for the Projects?
		significant effects to become not significant over time.	Suffolk Coastal Path and the Suffolk Coasts and Heaths AONB (i.e. the only receptors in common across the assessments) were concluded for SZC and the Projects.	context of the original assessment.
Terrestrial Ecology and Ornithology	No	No	With regards to direct impacts, as the footprints of SZC and the Projects do not overlap there is no pathway for direct cumulative impact	No
			The Projects considered cumulative impacts with SZC in relation to nitrogen deposition from construction traffic in the vicinity of Sizewell Gap Road which concluded not significant impacts. The SZC CIA did not consider nitrogen deposition impacts however for the construction traffic air quality assessment, the Projects were included in the baseline for the SZC project- alone assessment, which	



SZC Receptor Topic	Are the Projects included in the SZC CIA?	Does the Sizewell C CIA with the Projects change SZC project alone conclusions?	Considerations of the SZC conclusions with the Projects' CIAs	Is an Updated or Supplementary Assessment Required for the Projects?
			concluded not significant impacts.	
Amenity and Recreation	Yes	The SZC CIA states, as with LVIA, that increases in significance of impact on amenity during the construction phase (at the same Visual Receptor Groups as for the SZC LVIA assessment) would occur as a result of the Projects.	The Projects' recreation assessment states that information on SZC is required to determine the significance of effects.	Given that this issue is related to LVIA, clarification will be provided in the LVIA clarification note referred to above.
Terrestrial Historic Environment	Yes	No	Yes. Through the application of mitigation in the form of Written Schemes of Investigation (WSI) for the Projects and SZC, impacts would be not significant.	No
Soils and Agriculture	No	n/a	This is a direct impact. As the footprints of SZC and the Projects do not overlap there is no pathway for cumulative impact	No
Geology and Land Quality	No	n/a	This is a direct impact. As the footprints of SZC and the Projects do not overlap there	No



SZC Receptor Topic	Are the Projects included in the SZC CIA?	Does the Sizewell C CIA with the Projects change SZC project alone conclusions?	Considerations of the SZC conclusions with the Projects' CIAs	Is an Updated or Supplementary Assessment Required for the Projects?
			is no pathway for cumulative impact	
Groundwater and Surface Methodology	No	n/a	This is a direct impact. As the footprints of SZC and the Projects do not overlap there is no pathway for cumulative impact	No
Coastal Geomorphology and Hydrodynamics	Yes	No	SZC was screened out of the Projects' CIA because of the routeing of the cable corridor south of Sizewell, to minimise interaction of infrastructure (see section 3 of Appendix 4.6 Coastal Processes and Landfall Site Selection (APP-447)). SZC concluded impacts of negligible to minor adverse (not significant) significance on coastal geomorphology and hydrodynamics receptors.	No. Although SZC chose to screen the Projects into their assessment no significant impacts were concluded. The potential for impacts from the Projects' cables at the landfall was a concern for EDF Energy (both from potential effects on coastal processes and potential effects on Sizewell B (SZB) and SZC operations) during the pre-application process. The Applicants consider that these concerns are being addressed and this will be reflected in the Statements of Common Ground with both SZB and SZC.



	_	

SZC Receptor Topic	Are the Projects included in the SZC CIA?	Does the Sizewell C CIA with the Projects change SZC project alone conclusions?	Considerations of the SZC conclusions with the Projects' CIAs	Is an Updated or Supplementary Assessment Required for the Projects?
Marine Ecology and Water Quality	Yes	No	Marine EcologySZC was screened out of the Projects' CIA because of the routeing of the cable corridor south of Sizewell.Water QualityGiven the magnitude of effects for water quality, all cumulative impacts were screened out.	No. Although SZC chose to screen the Projects into their assessment no significant impacts were concluded.
Marine Historic Environment	No	n/a	This is a direct impact. As the construction footprints of SZC and the Projects do not overlap there is no pathway for cumulative impact	No
Marine Navigation	Yes	No, the SZC CIA concluded cumulative impacts with the Projects would remain the same as in the SZC project- alone assessment i.e. tolerable (not significant)	SZC was screened out of the Projects' CIAs.	No, SZC was screened out of the Projects' CIAs and while the Projects' were included in the SZC CIA the conclusions did not change from the SZC project-alone conclusions.
Major Accidents and Disasters	Yes	No	As part of Chapter 6 Project Description (APP-054), major accident and disasters	No





SZC Receptor Topic	Are the Projects included in the SZC CIA?	Does the Sizewell C CIA with the Projects change SZC project alone conclusions?	Considerations of the SZC conclusions with the Projects' CIAs	Is an Updated or Supplementary Assessment Required for the Projects?
			were discussed and potential risks considered negligible.	
Health and Wellbeing	Yes	No	The Projects' CIAs recognised the potential for cumulative impacts and undertook a qualitative assessment which concluded that cumulative human health impacts with SZC would be not significant.	With respect to noise at receptor locations near the SZC rail proposals clarification will be provided in the noise and vibration section of the traffic and transport clarification note referred to above.
			The SZC project-alone and cumulative Health and Wellbeing impact assessment concluded moderate adverse (significant) impacts related to noise at receptor locations near SZC rail proposals.	It is not considered that any further update is required with respect to Health and Wellbeing.
			SZC also concluded moderate beneficial (significant) cumulative impacts related to cumulative health and wellbeing effects associated with changes in socio-economic factors.	
			All other SZC Health and Wellbeing effects were concluded as not significant	





SZC Receptor Topic	Are the Projects included in the SZC CIA?	Does the Sizewell C CIA with the Projects change SZC project alone conclusions?	Considerations of the SZC conclusions with the Projects' CIAs	Is an Updated or Supplementary Assessment Required for the Projects?
			and therefore align with the Projects' CIAs.	



2.1.1 Conclusion

- 32. As a result of the screening exercise carried out in *Table 1*, the Applicants will submit clarifications for the following receptor topics:
 - Traffic and Transport, including:
 - a supplementary cumulative traffic assessment taking into account SZC; and
 - updates in respect of:
 - Noise and Vibration (including health and wellbeing); and
 - Air Quality.
 - LVIA, including relevant updates in respect of:
 - Amenity and Recreation.
 - Socio-Economics and Tourism.
- 33. The Applicants intend to submit these clarifications at **Deadline 2**.



3 References

DTA Ecology (2020). Habitats Regulations Derogations Workshop Report. Doc. Ref. 1094.

Hornsea Three (2020). Response to Secretary of State's Consultation Appendix 4: Post Examination Mitigation and Project Envelope Modifications. Annex B Revised Ornithological Mitigation Scenario. Available at: https://infrastructure.planninginspectorate.gov.uk/wp-

content/ipc/uploads/projects/EN010080/EN010080-003194-

HOW03_CON02_Appendix4%20Annexes_Mitigation.EnvelopeModifications.pdf

MacArthur Green (2020). Norfolk Vanguard Offshore Wind Farm Additional mitigation Appendix 1 Updated Collision Risk Modelling ExA;Mit;11.D10.2App1 Available at: https://infrastructure.planninginspectorate.gov.uk/wp-

content/ipc/uploads/projects/EN010079/EN010079-004215-ExA; Mit; 11.D10.2.App1 Additional Mitigation Appendix 1 Updated Collision Risk Modelling.pdf

Norfolk Boreas Offshore Wind Farm (2020). Offshore Ornithology Assessment Update.Project Alone Collision Risk Modelling (Version 2) (Clean) ExA.AS-8.D7.V2 (REP7-029)Availableat:https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010087/EN010087-001929-

Offshore%20Ornithology%20Assessment%20Update%20Project%20Alone%20Collisi on%20Risk%20Modelling%20(Version%202)%20(Clean).pdf

Orsted (2019) Hornsea Project Four: PEIR Volume 5, Annex 5.3: Offshore Ornithology Collision Risk Modelling. Available at: <u>https://hornseaprojects.co.uk/hornsea-project-four/documents-library/formal-consultation</u>

Sizewell C (2020). 6.11 Volume 10 Project-wide, Cumulative and Transboundary Effect. Chapter 4 Assessment of Cumulative Effects with Other Plans, Projects and Programmes. PINS reference EN010012. Available at: <u>https://infrastructure.planninginspectorate.gov.uk/wp-</u> <u>content/ipc/uploads/projects/EN010012/EN010012-002196-</u> SZC_Bk6_ES_V10_Ch4_Cumulative_Effects.pdf

SPR (2017) East Anglia TWO and East Anglia ONE North Scoping Reports

SPR (2020). Non-Material Change. Various documents available at: <u>https://infrastructure.planninginspectorate.gov.uk/projects/eastern/east-anglia-three-offshore-wind-farm/?ipcsection=docs&stage=7&filter1=Non-Material+Change&filter2=NMC+July+2020</u>