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# East Anglia ONE North and East Anglia TWO Offshore Windfarms

## Draft Statement of Common Ground Office for Nuclear Regulation

Applicants: East Anglia ONE North Limited and East Anglia TWO Limited  
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Applicable to **East Anglia ONE North** and **East Anglia TWO**



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## Glossary of Acronyms

DCO	Development Consent Order
ExA	Examining Authority
NDA	Nuclear Decommissioning Authority
ONR	Office for Nuclear Regulation
PD	Procedural Decision
SoCG	Statement of Common Ground

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## Glossary of Terminology

Applicants	East Anglia TWO Limited / 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.



# 1 Introduction

## 1.1 Background

1. This document is applicable to both the East Anglia TWO and East Anglia ONE North DCO applications, and therefore is endorsed with the yellow and blue icon used to identify materially identical documentation in accordance with the Examining Authority's procedural decisions on document management of 23<sup>rd</sup> December 2019 (PD-004). Whilst this document has been submitted to both Examinations, if it is read for one project submission there is no need to read it for the other project submission.
2. This Statement of Common Ground (SoCG) has been prepared by East Anglia TWO Limited, East Anglia ONE North Limited (the Applicants) and the Office for Nuclear Regulation (ONR) in relation to the East Anglia TWO project and the East Anglia ONE North project (the Projects). It identifies areas of the East Anglia TWO and East Anglia ONE North Development Consent Order (DCO) applications (the Applications) where matters are agreed or not agreed between the parties.
3. The Applicants have had regard to the guidance for the examination of applications for development consent (Department for Communities and Local Government, 2015) when compiling this SoCG.
4. This SoCG has been structured to reflect topics of the applications that are of interest to the ONR. Topic specific matters agreed, not agreed and actions to resolve matters between the Applicants and the ONR are included within this SoCG.
5. **Table 3** presented below represent the SoCG with the Applicants and the ONR in respect of the following topics:
  - Nuclear Safety; and
  - Draft DCO.
6. Throughout the SoCG the phrase "Agreed" identifies any point of agreement between the Applicants and the ONR. The phrase "Not Agreed" identifies any point that is not yet agreed between the Applicants and the ONR.
7. Matters that are not yet agreed will be the subject of ongoing discussion between the Applicants and the ONR to reach agreement on each matter wherever possible, or refine the extent of disagreement between parties. The notes column of the SoCG tables provides commentary on these matters.



8. The matters considered within this SoCG apply only to the ONR's statutory remit, which includes the independent regulation of nuclear safety at licensed nuclear sites in the United Kingdom. The ONR also regulates nuclear security but considers that the Projects have no nuclear security implications at present, although this will be kept under review as the project progresses. In the context of the Applicants' DCO Applications, ONR's interest therefore relates to the following:

- Sizewell A Site, currently owned by the Nuclear Decommissioning Authority (NDA) and being decommissioned by Magnox Limited, the centre of which is located approximately 0.8km from the Projects' DCO limits at the closest point\*;
- Sizewell B Nuclear Power Plant, operated by EDF Energy Nuclear Generation Limited, the centre of which is located approximately 1.1km from the Projects' DCO limits at the closest point\*;
- Proposed Sizewell C New Nuclear Power Station, for which a DCO application was submitted by NNB Generation Company (SZC) Limited in May 2020 and subsequently accepted for examination by the Planning Inspectorate on 24<sup>th</sup> June 2020. The centre of the main operational buildings of the Sizewell C New Nuclear Power Station is located approximately 1.8km from the Projects' DCO limits at the closest point\* ; and
- The ONR is also responsible for enforcing the Radiation (Emergency Preparedness and Public Information) Regulations 2019 for licensed sites, authorised defence sites, nuclear new build sites and nuclear warship sites, and for Local Authorities in the areas containing those sites. ONR will seek to ensure that all duty holders co-operate to the extent necessary to fulfil their duties under applicable health and safety legislation.

## **1.2 The Development**

9. The key offshore components of each project will comprise:

- Offshore wind turbines and their associated foundations;
- Offshore platforms - up to four offshore electrical platforms and their associated foundations supporting some of the windfarm's electrical equipment, and up to one construction, operation and maintenance platform and associated foundations that may cater for personnel and activities required during the construction phase and operation and maintenance of the windfarm;

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\* Approximate distance from Work No. 10.



- Sub-sea cables between the wind turbines and offshore electrical platforms (inter-array), between separate offshore platforms (platform link cables) and between offshore electrical platforms and the landfall (export cables);
- Scour protection around foundations and on inter-array, platform link and export sub-sea cables as required; and
- Potential for one meteorological mast and its associated foundations for monitoring wind speeds during the operational phase of the windfarm.

10. The key onshore components of each project will comprise:

- The landfall site with up to two transition bays to connect the onshore and offshore cables;
- Up to six onshore cables, up to two fibre optic cables and up to two distributed temperature sensing cables installed underground (some or all of which may be installed in ducts) and associated jointing bays installed underground;
- Onshore substation; and
- Electrical cable connection between the onshore substation and National Grid substation.

11. National Grid infrastructure will also be required to connect each project to the national electricity grid. Key components of the National Grid infrastructure which is common to both projects will comprise:

- National Grid substation;
- Cable sealing end compounds and a cable sealing end (with circuit breaker) compound; and
- Realignment of the existing overhead lines; including the reconstruction or replacement of up to three existing overhead pylons in proximity to the National Grid substation and the addition of up to one new pylon in close proximity to existing overhead pylons.



### 1.3 Summary of Agreed, Not Agreed and Outstanding Matters

12. **Table 1** provides a summary of the matters agreed, not agreed and those that are outstanding between the Applicants and the ONR for each of the relevant SoCG topics areas. For further information on agreements that are outstanding / under discussion, and for which the Applicants and the ONR are working to address during the examination period, please refer to the Notes column of **Table 3**.

**Table 1 Summary of Agreed, Not Agreed and Outstanding Matters**

Topic	Summary
Nuclear Safety	There are no outstanding matters of disagreement relating to nuclear safety within this draft SoCG at the time of writing.
DCO	<p>No agreement has been reached on the wording of a new Requirement proposed by the Suffolk Joint Emergency Planning Unit. The Applicants will continue to liaise with the Suffolk Joint Emergency Planning Unit to resolve this matter.</p> <p>There are no other outstanding matters of disagreement relating to the DCO within this draft SoCG at the time of writing.</p>



## 2 Statement of Common Ground

13. A summary of the consultation undertaken to date with the ONR and the matters agreed or not agreed between the Applicants and the ONR (based on discussions and information exchanged between the Applicants and the ONR during the pre-application and post-application phases of the applications) are set out below for each of the SoCG topic areas.

### 2.1 Nuclear Safety

14. **Chapter 6** of each environmental statement (APP-054) presents a description of the Projects, and the **Works Plans (Onshore)** (AS-003) present the onshore geographic extent of the Projects. Each of the Applications includes a **draft DCO** (APP-023) setting out the form and content of the development consents sought for the East Anglia TWO and East Anglia ONE North projects.
15. **Table 2** provides an overview of consultation undertaken with the ONR regarding the Projects. Further details on the stakeholder engagement process can be found in the **Consultation Report** (APP-029).

Table 2 Summary of consultation with the ONR regarding the projects and draft DCO

Date	Contact Type	Topic
<b>Pre-Application</b>		
28 January 2019	Correspondence	Invitation to ONR to respond to the Applicants' Phase 4 (Section 42) consultations on the proposed East Anglia TWO project and East Anglia ONE North project.
10 December 2019	Correspondance	ONR consultation responses to the Planning Inspectorate's Section 56 consultations on the proposed East Anglia TWO project and East Anglia ONE North project.
<b>Post-Application</b>		
23 April 2020	Correspondance	Relevant Representation submitted by the ONR to the Planning Inspectorate on the proposed East Anglia TWO project and East Anglia ONE North project.
9 July 2020	Meeting	SoCG meeting 1

16. **Table 3** presents the matters agreed or not agreed in relation to nuclear safety and the draft DCOs.



**Table 3 Nuclear safety and the Projects' draft DCOs**

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Office for Nuclear Regulation Position	Notes
<b>Nuclear Safety</b>						
ONR-001	Interaction with Sizewell A Site	<p>There is a legal expectation under the Infrastructure Planning (Environmental Impact Assessment) Regulations for projects of this nature (i.e. the Projects) that the potential cumulative environmental effects of projects in the surrounding area are considered.</p> <p>In this respect, ONR highlight the decommissioning project at the nearby Sizewell A licensed nuclear site.</p> <p>Given this, ONR recommend that Magnox Limited is included as a consultee in the project. The scoping report indicates that EDF is the owner of Sizewell A. ONR highlight that the NDA own Sizewell A and EDF Energy owns Sizewell B.</p>	Agreed	Agreed	Agreed	<p>The Applicants are liaising directly with the NDA (owner of the Sizewell A Site) and Magnox Limited (nuclear site licence holder for the Sizewell A Site) to produce a joint SoCG.</p> <p>The ONR has no further comment in relation to the Sizewell A Site.</p>
ONR-002	Interaction with proposed Sizewell C New Nuclear Power Station	On commencement of construction of the Projects, the Projects have the potential to present external hazards to the Sizewell C New Nuclear Power Station's main development site.	Agreed	Agreed	Agreed	NNB Generation Company (SZC) Limited applied for a nuclear site licence for the proposed Sizewell C New Nuclear Power Station on 30 June 2020. At the time of publishing this SoCG (Rev 01), the proposed Sizewell



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Office for Nuclear Regulation Position	Notes
		ONR notes that the timescales for construction/operation of the Projects could overlap with the planned construction/operation timescales for the Sizewell C New Nuclear Power Station and highlights the need for the future Sizewell C licensee to make any allowances necessary to accommodate the Projects in the safety case for the Sizewell C site.				<p>C New Nuclear Power Station does not hold a nuclear site licence from ONR.</p> <p>The Applicants are liaising directly with NNB Generation Company (SZC) Limited to produce a separate SoCG with them as developer of the proposed Sizewell C New Nuclear Power Station.</p> <p>The Applicants will continue to liaise with NNB Generation Company (SZC) Limited during the development of the proposed Sizewell C New Nuclear Power Station to ensure that any necessary information on the Projects is provided to SZC in the future for the preparation of the Sizewell C safety case and onsite emergency plan.</p> <p>Such liaison will also identify interfaces that may arise during construction of the Projects and seek appropriate resolution to any such conflicts.</p>
ONR-003	Interaction with Sizewell B Nuclear Power Station	As the Projects have the potential to present external hazards to the Sizewell B nuclear licensed site, ONR has confirmed that the potential hazards presented by the	Agreed	Agreed	Agreed	The ONR has discussed this matter with Sizewell B and is content (on the basis of information on the Projects available to date) that no new hazards are



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Office for Nuclear Regulation Position	Notes
		Projects are within the scope of the Sizewell B existing safety case and on-site emergency arrangements.				presented or are already adequately addressed by Sizewell B's existing safety case. Furthermore, Sizewell B has an ongoing dialogue with the Applicants, allowing Sizewell B to manage any emergent risk from the Projects.
ONR-004	Interaction with Sizewell B Nuclear Power Station	The Applicants and the operators of Sizewell B Nuclear Power Station will liaise directly regarding the requirement (if any) for the Sizewell B safety case and Onsite Emergency Plan to be updated to accommodate the onshore and offshore elements of the Projects.	Agreed	Agreed	Agreed	Sizewell B has an ongoing dialogue with the Applicants, allowing Sizewell B to manage any emergent risk from the Projects.
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	Agreed	Agreed	Agreed	None



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Office for Nuclear Regulation Position	Notes
		necessary information to satisfy the Suffolk Joint Emergency Planning Unit's emergency planning requirements in relation to the Sizewell Off Site Emergency Plan.				
<b>Draft Development Consent Order</b>						
ONR-006	Interaction with Suffolk Joint Emergency Planning Unit	The ONR has consulted with Suffolk County Council's Emergency Planner who has confirmed that the Projects' onshore works are able to be accommodated within the Sizewell Off Site Emergency Plan prepared under the Radiation (Emergency Preparedness and Public Information) Regulations 2019, provided that the Requirement wording sought by the Suffolk Joint Emergency Planning Unit to ensure the credibility and viability of the Sizewell Off Site Emergency Plan are included within the Projects' <b>draft DCO</b> (APP-023).	Not Agreed	Not Agreed	Agreed	The ONR support the following proposed Requirement sought by the Suffolk Joint Emergency Planning Unit:  <i>No part of the preparation or construction works shall commence until emergency plans relating to these activities have been agreed and issued. Nuclear emergency plans cover the EDF Energy Sizewell B Operators emergency plan and the Suffolk County Council Off Site Emergency Plan issued under Radiation (Emergency Preparedness and Public Information) Regulations 2019. Wider civil contingency arrangements include Suffolk Resilience Forum emergency plans for identified risks issued under the Civil Contingencies Act 2004 that</i>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Office for Nuclear Regulation Position	Notes
						<p><i>might affect the Sizewell C main development site and any associated infrastructure.</i></p> <p><i>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.</i></p> <p>The Applicants acknowledge the importance of the Sizewell Off Site Emergency Plan but do not agree with the wording of the proposed Requirement. The Applicants will continue to liaise with the Suffolk Joint Emergency Planning Unit to resolve this matter.</p>
ONR-007	Interaction with Suffolk Joint Emergency Planning Unit	The ONR do not consider Requirement 33 of the <b>draft DCO</b> (APP-023) to be necessary in light of the Applicants' commitment in ONR-005 for the Applicants to liaise directly with the Suffolk Joint Emergency Planning Unit to provide	Agreed	Agreed	Agreed	<p>Requirement 33 of the <b>draft DCO</b> (APP-023) states:</p> <p><i>Emergency incident response plan</i></p> <p><i>33.(1) No stage of Work Nos. 9, 10, 11, 12, 13 and 15 shall commence until an</i></p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	Office for Nuclear Regulation Position	Notes
		necessary information to satisfy the Suffolk Joint Emergency Planning Unit's emergency planning requirements in relation to the Sizewell Off Site Emergency Plan.				<p><i>emergency incident response plan relating to the construction of that stage of the relevant works has been submitted for approval by the relevant planning authority.</i></p> <p><i>(2) The emergency incident response plan shall be carried out as approved in relation to the relevant part of the relevant works.</i></p>
<b>Other Matters as Required</b>						
ONR-008	Nuclear Security	ONR considers that the Projects have no nuclear security implications at present, although this will be kept under review as the Projects progress.	Agreed	Agreed	Agreed	None



### 3 Signatures

17. The above Statement of Common Ground is agreed between East Anglia TWO Limited, East Anglia ONE North Limited and the Office for Nuclear Regulation on the day specified below.

Signed: \_\_\_\_\_

Print Name: \_\_\_\_\_

Job Title: \_\_\_\_\_

Date: \_\_\_\_\_

Duly authorised for and on behalf of the **Office for Nuclear Regulation**

Signed: \_\_\_\_\_

Print Name: \_\_\_\_\_

Job Title: \_\_\_\_\_

Date: \_\_\_\_\_

Duly authorised for and on behalf of **East Anglia TWO Limited**

Signed: \_\_\_\_\_

Print Name: \_\_\_\_\_

Job Title: \_\_\_\_\_

Date: \_\_\_\_\_

Duly authorised for and on behalf of **East Anglia ONE North Limited**