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Lead Members of the Examining Authority for Applications EN010077 and EN010078
National Infrastructure Planning, the Planning Inspectorate
Temple Quay House, 2 The Square
Bristol
BS1 6PN

By email: EastAngliaTwo@planninginspectorate.gov.uk and EastAngliaOneNorth@planninginspectorate.gov.uk

02 November 2020

Dear Sirs

**East Anglia One North (EA1N) (Ref. EN010077) and East Anglia Two (EA2) (Ref EN010078) Offshore Wind Farm -
Deadline 1: Responses to Examining Authorities' Written Questions and Notification to Speak at the Hearing**

Responses to Questions

NNB Generation Company (SZC) Limited (SZC Co.) is writing in response to the Rule 8 Letter from the Examining Authority (ExA) sent on 12 October 2020. SZC Co. has reviewed the ExA's First Written Questions (ExQ1) and responded to those which are relevant. Please find enclosed at Annex 1 of this letter, SZC Co.'s responses to the relevant questions to ExQ1.

Statement of Common Ground

We can confirm that a draft Statement of Common Ground (SoCG) has been agreed with Scottish Power Renewables (SPR) in relation to both EA1N and EA2. SPR will submit the draft SoCG as part of their response to Deadline 1. The outstanding matter relates to the protective provisions that SZC Co. has requested for inclusion in the Development Consent Orders. We will continue to discuss this with SPR over the coming weeks and hope to submit a final SoCG into the examination at another deadline.

Errata

We would like to bring to the ExA's attention errors in the Additional Submission document AS-037 'Applicant's Comments on Relevant Representations Volume 4: Landowners'. In response to RR-038 (Page 3), it identifies EDF Nuclear Energy Generation Limited as having an interest in plot numbers 28, 29, 30, 31, 35, and 39 (in relation to the October 2014 Option Agreement). We can confirm that SZC Co. are the beneficiary of this option agreement rather than EDF Nuclear Energy Generation Limited.

Notification to Speak at Hearings

We are confident that we will be able to agree the position on protective provisions with SPR and that the errata noted in this letter will be corrected. However, pending confirmation of both these matters, we wish to reserve the position to attend the Compulsory Acquisition Hearing (CAH1) on 1 December 2020; and the Issue Specific Hearing 2 (ISH2) into Onshore Siting, Design and Construction on 2 and 3 December 2020.

Yours sincerely

Carly Vince
Chief Planning Officer

Annex 1 - SZC Co's Responses to ExQ1

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Annex 1: SZC Co's Responses to ExA's Questions

ExQ Ref	Question to	Question	SZC Co. 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?	SZC Co. is content with the provisions in Article 20 paragraph 5.
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?	SZC Co. will require protective provisions within each of the Development Consent Orders to ensure its interests are adequately protected. SZC Co. is continuing to engage with Scottish Power Renewables on this matter.
1.14.3.	Office for Nuclear Regulation, SCC, NNB Generation (SZC) Ltd	Interface with Sizewell C Are you content that the ES adequately describes and concludes on any interface effects on the Sizewell C proposed development, including construction, operation (including emergency planning) and decommissioning? If not, please indicate the additional analysis and actions required.	The redline boundary for the offshore works both EA1N and EA2 overlaps with the redline boundary for the Sizewell C Project (Ref. EN010012). This is addressed in the draft SoCG relevant to both EA1N and EA2 between SZC Co. and SPR. SZC Co. understands that EA1N and EA2 have designed in a 500m working corridor that would place the export cables 652m from the Sizewell C headworks. However, it is not clear what works, if any, would occur within this working corridor. SZC Co. seeks protective provisions to ensure that there are no conflicts in the construction, operation and decommissioning phases of all three projects. The establishment of a Harbour Authority for the Sizewell C Project (if consented) would also aid safe operations in the overlap area. The construction and operation of Sizewell C and Sizewell B Relocated Facilities have been considered as cumulative schemes in the EA1N and EA2 Environmental

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			<p>Statements. Significant additional cumulative effects identified within the EA1N and EA2 Environmental Statements with Sizewell C are:</p> <ul style="list-style-type: none"> • Significant landscape and visual effects during the construction phase; • Major beneficial effects for employment; and • Potentially significant transport effects, although these were only considered qualitatively in the EA1N and EA2 Environmental Statements. <p>The cumulative effects assessment undertaken as part of the Sizewell C Environmental Impact Assessment also identified the potential for additional significant cumulative effects with EA1N and EA2, in addition to other schemes. These additional potential significant cumulative effects are:</p> <ul style="list-style-type: none"> • Conventional Waste and Material Resources (Material Requirements) - Significant effect identified; • Socio-economics (Labour Market: supply chain benefits and labour investment) - Moderate beneficial, significant effect at a local scale; • Transport (A12 at Little Glemham and Marlesford) - Potential for cumulative moderate adverse effect on fear and intimidation; • Landscape and Visual (Visual Receptor groups 18, 19 and 20) Major – moderate adverse, significant visual effect (a combination of effects from EA1N, EA2 in addition to Nautilus Interconnector, Eurolink Interconnector, Greater Gabbard extension and Galloper Extension Offshore Wind Farms); • Amenity and Recreation (Visual Receptor groups 19 and 20) - Major – moderate adverse, significant effect (a combination of effects with EA1N, EA2, in addition to Nautilus Interconnector, Eurolink Interconnector, Greater Gabbard extension and Galloper Extension Offshore Wind Farms). <p>On reviewing the respective Environmental Statements, it appears that broadly similar cumulative effects have been identified across the three projects, but</p>
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			recognising that there are different receptor groups for each. The main exception to this is that the potential for cumulative transport effects was not assessed quantitatively in the Environmental Statements for EA1N and EA2. The only additional significant cumulative effect which has a bearing on both schemes is fear and intimidation on the A12 at Little Glemham and Marlesford. Sizewell C are proposing monitoring of construction programmes for Sizewell C Project and EA1N and EA2 through a traffic review group. This is proposed to mitigate the effects on the A12 at Little Glemham and Marlesford. This is to determine if worst case traffic flows are likely to arise. If so, then additional freight management measures are proposed to be agreed with the traffic review group and funded through the transport contingency fund, to be secured through the Section 106 Agreement, as discussed in draft Section 106 Agreement Heads of Terms appended to the Planning Statement (Doc Ref 8.4) for the SZC Project.
1.14.4.	Office for Nuclear Regulation, SCC, EDF Nuclear Energy Generation, NNB Generation (SZC) Ltd	Interface with nuclear construction, operation and decommissioning at Sizewell Ltd Are offshore works prospectively affecting the coralline 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.	The developer has made a commitment to use Horizontal Directional Drill (HDD) to install the cable across near sub-tidal at Thorpeness to avoid impacts to the sediment transport pathway there, particularly in relation to the coralline crag. The developer has provided a map with potential 'punch out' locations that are to the south and west of the coralline crag. This will ensure no physical damage to the crag itself, which acts as a significant hard point for local coastal processes. SZC Co. supports the southern extension to the corridor to accommodate this. Nevertheless, this is still described as a 'preference' and SZC Co. would like to see the avoidance of the surface crag defined as a formal commitment, together with HDD routing and depth designed to minimise any potential physical impact on the subterranean crag through which the HDD may pass and will discuss with the developer how this is secured.
1.14.6.	All Interested Parties	Relevant projects and effects for cumulative impact assessment purposes: other projects Are there any other projects that are not documented in the ES and are not grid	SZC Co. considered the assessment of cumulative effects with EA1N and EA2 as well as a number of additional schemes. These schemes are detailed within the 'Short List' of cumulative schemes, Vol 10. Chapter 1 Appendix 1B of the Sizewell C Environmental Statement (https://infrastructure.planninginspectorate.gov.uk/wp-

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		<p>connection projects at Friston (ExQ1.14.5) that are relevant and need to be considered by the ExA?</p> <ul style="list-style-type: none"> • Please identify these projects and identify the public information source(s) from which you have made your assessment that they are relevant. 	<p>content/ipc/uploads/projects/EN010012/EN010012-002192-SZC Bk6 ES V10 Ch1 EIA Methodology Appx1A Long List 1B Short list.pdf). These schemes were identified through planning portal searches and liaison with Suffolk County Council and East Suffolk Council. Examples of schemes considered include Nautilus Interconnector, Eurolink Interconnector, Greater Gabbard Offshore Wind Farm (OWF) extension, Galloper OWF Extension and a number of housing schemes in the area. Further detail is available in the short list of schemes, including links to planning portal pages, where relevant. Some of the short-listed schemes in the Sizewell C assessment may not be relevant to the EA1N and EA2 assessments.</p> <p>It is not clear at this stage whether these additional cumulative schemes have been considered within the cumulative assessments for EA1N and EA2. It appears that additional cumulative schemes and some topic assessments of Sizewell C have been scoped out of the EA1N and EA2 assessments. Given that the SZC application has now been submitted the full suite of environmental information is now available, should it need to be drawn upon.</p>
1.18.59.	EDF Energy (Sizewell C New Nuclear)	<p>Paragraph 354 refers to your freight management strategy for the construction of the Sizewell C New Nuclear power station.</p> <ul style="list-style-type: none"> • Please provide the latest version of this strategy. 	<p>The freight management strategy for Sizewell C proposes to utilise a combination of road, rail and marine deliveries of materials to the construction site. Deliveries on each mode will be supported by additional infrastructure:</p> <ul style="list-style-type: none"> - Road – a two village bypass of Farnham and Stratford St Andrew, a Sizewell link road bypassing the B1122, a freight management facility a roundabout at Yoxford roundabout and other minor highway improvements; - Rail – upgrades to the Leiston branch line and a new rail link into the construction site; - Marine – a beach landing facility for the delivery of abnormal indivisible loads. <p>The Sizewell C freight management strategy is described in Chapter 4 of the Transport Assessment (Doc Ref. 8.5) submitted with our application for development consent and available here: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/544442/content/ipc/uploads/projects/EN010012/EN010012-002220-SZC BK8 8.5 Transport%20Assessment.pdf</p>



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<p>1.18.60.</p>	<p>The Applicant, EDF Energy (Sizewell C New Nuclear), SCC 1 2</p>	<p>Paragraphs 359 to 367 refer to highway improvements proposed in relation to the Sizewell C New Nuclear Power Station project, which it is not currently envisaged will be available prior to construction work starting on this East Anglia project.</p> <ul style="list-style-type: none"> Given that the Sizewell C New Nuclear Power Station project has been accepted for examination, have any discussions been held between the Applicant, EDF Energy and the highway authority in relation to ways in which these improvements could be ready for use prior to work commencing on the East Anglia ONE North and East Anglia TWO project(s) in order to reduce cumulative impacts? 	<p>There is regular engagement on transport matters between SZC Co. and SPR, including the proposed highway improvements for the three projects. There is only one significant overlap where the proposals for the projects differ and that is the A12/A1094 Friday Street junction.</p> <p>Under the Sizewell C Application, this junction would be revised to form the northern roundabout for the two village bypass scheme. The EA1N and EA2 proposals do not include a roundabout at this junction and the proposed intervention would be within the existing public highway boundary.</p> <p>As the three projects progress, an ongoing dialogue will be maintained regarding the timing for implementation proposals at this junction. Discussions between the parties and with the highway authority will establish the most appropriate timing to commence work at this junction.</p>
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