



# The Sizewell C Project

## 9.10.16 Initial Statement of Common Ground - East of England Ambulance Trust

---

Revision: 1.0  
Applicable Regulation: Regulation 5(2)(q)  
PINS Reference Number: EN010012

---

June 2021

Planning Act 2008  
Infrastructure Planning (Applications: Prescribed  
Forms and Procedure) Regulations 2009



---

## CONTENTS

1	INTRODUCTION .....	1
1.1	Status of the SOCG .....	1
1.2	Purpose of this document .....	1
1.3	Parties to this Statement of Common Ground .....	2
1.4	Structure of this Statement of Common Ground .....	3
2	POSITION OF THE PARTIES .....	3

## TABLES

Table 2.1	Position of the Parties - SZC Co. and EEAST .....	5
Table 2.2	SO CG meetings held between SZC Co. and EEAST .....	12

## APPENDICES

APPENDIX A:	ENGAGEMENT ON THE SOCG .....	12
-------------	------------------------------	----



## 1 INTRODUCTION

### 1.1 Status of the SOCG

1.1.1 This Statement of Common Ground ('SoCG') has been prepared in respect of the application for a development consent order ('DCO') to the Planning Inspectorate ('PINS') under the Planning Act 2008 ('the Application') for the proposed Sizewell C Project.

1.1.2 This SoCG version 01 has been prepared by NNB Generation Company (SZC) Limited ('SZC Co.') as the Applicant. It includes SZC Co.'s response to the East of England Ambulance Service's (EEAST) relevant representation only - for information at Deadline 2. The deadline for the first draft including EEAST's comments is Deadline 3 and an updated version will be submitted then.

### 1.2 Purpose of this document

1.2.1 The purpose of this SoCG is to set out the position of the parties on health and wellbeing and community safety issues, so far as they relate to the remit of EEAST, arising from the application for development consent for the construction and operation of the Sizewell C nuclear power station, and together with the proposed associated development (hereafter referred to as 'the Sizewell C Project').

1.2.2 This SoCG has been prepared in accordance with the 'Guidance for the examination of applications for development consent' published in March 2015 by the Department of Communities and Local Government (hereafter referred to as 'DCLG guidance').

1.2.3 Paragraph 58 of the DCLG Guidance states:

*"A statement of common ground is a written statement prepared jointly by the applicant and another party or parties, setting out any matters on which they agree. As well as identifying matters which are not in real dispute, it is also useful if a statement identifies those areas where agreement has not been reached. The statement should include references to show where those matters are dealt with in the written representations or other documentary evidence."*

1.2.4 The aim of this SoCG is therefore to inform the Examining Authority and provide a clear position of the state and extent of discussions and agreement between SZC Co. and EEAST on matters relating to the Sizewell C Project.

1.2.5 This SoCG does not seek to replicate information which is available elsewhere within the DCO application documents. All documents are available on the Planning Inspectorate website: <https://infrastructure.planninginspectorate.gov.uk/projects/eastern/the-sizewell-c-project/>).

### 1.3 Parties to this Statement of Common Ground

1.3.1 SZC Co. has submitted an application for development consent to build and operate a new nuclear power station, Sizewell C, along with the associated development required to enable construction and operation.

1.3.2 EEAST NHS Trust provides response to emergency calls made through the 999 system in Suffolk, Norfolk, Essex, Bedfordshire, Hertfordshire and Cambridgeshire. EEAST also responds to health care professional calls, and, where contracted, provides a non-emergency patient transport service. EEAST provides emergency medical treatment, diagnosis, transport and discharge of patients as required. EEAST benefits from lay volunteers who provide support through Community First Responder schemes across the region, with the Leiston responders providing five staff to assist with life threatening calls within a five-mile radius of the village, including Sizewell.

1.3.3 Collectively SZC Co. and EEAST are referred to as ‘the parties’.

1.3.4 Matters of interest to the EEAST and which are detailed in Section 2 of this SoCG are as follows:

- The assessment of health and wellbeing effects in the Environment Statement (ES) (Book 6, Volume 2, Chapter 28) and associated appendices, plus updates as set out in the ES Addendum (Doc Ref. 6.14).
- The approach to community safety, including roles and responsibilities of the Sizewell C Project and other stakeholders, as set out in the Community Safety Management Plan (**Doc Ref. 8.16**).
- The assessment of transport effects in the ES (**Book 6, Volume 2, Chapter 10**) and the Transport Assessment (**Doc Ref. 8.5**) plus measures set out within the transport management plans (**Doc Refs. 8.6-8.8**).

- The major accidents and disasters assessment (**Book 6, Volume 2, Chapter 27**), so far as it relates to matters within EEAST's remit (**Doc Ref. 6.3**).

1.3.5 In addition, other DCO application documents of interest to Suffolk Constabulary may include:

- Draft DCO (including the Requirements) (Book 3);
- Community Impact Report (Doc Ref. 5.13);
- Draft Section 106 heads of terms (Doc Ref. 8.4) and updates including: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010012/EN010012-002576-SZC Bk8 8.4JAd Planning Statement Appx 8.4J Addendum Update on Section 106 Agreement.pdf>;
- Code of Construction Practice (Doc Ref. 8.11);
- Mitigation Route map (Doc Ref. 8.12); and
- The **ES** update in the January submission (**Doc Ref. 6.14**).

## 1.4 Structure of this Statement of Common Ground

1.4.1 Chapter 2 provides schedules which detail the matters of agreement and disagreement between the parties. It also identifies where discussions are continuing if applicable.

1.4.2 **Appendix A** provides a summary of engagement undertaken to establish this SoCG.

## 2 POSITION OF THE PARTIES

2.1.1 **Table 2.1** to **2.13** provide details on the areas of agreement and disagreement between the parties.

2.1.2 This SOCG focuses on the following areas:

- Health and wellbeing; and
- Community Safety, so far as it relates to health and wellbeing matters.

2.1.3 Other stakeholders, including Suffolk Constabulary, Suffolk Fire and Rescue, the CCGs, the Councils and Public Health Suffolk have responsibility for

---

other aspects of community safety and EEAST will not comment on these, save where there are overlaps, or where a measure proposed for another stakeholder resolves a concern raised by EEAST.

**Table 2.1 Position of the Parties - SZC Co. and EEAST**

Ref.	EEAST relevant rep comment	SZC Co.'s response	Discussion / Further Action	Agreed / Not Agreed / In Progress <sup>1</sup>
EE1	<p>RR2</p> <p>Review of the Environmental Statement (ES) and related DCO application documents indicates a lack of recognition of EEAST - as both a key health service provider and emergency service, who form an integral part of a 'Health &amp; Blue Light Partnership Working Group' with the Suffolk &amp; North East Essex CCG's, Suffolk Constabulary and Suffolk Fire Service.</p>	<p>EEAST are recognised as a key health stakeholder and have been party to direct engagement throughout the DCO process. The effects on EEAST are assessed in <b>Book 6, Volume 2, Chapter 28</b> Health and Wellbeing (<b>Doc Ref. 6.3</b>). The need for mitigation, in the form of a S106 contribution, is identified in the Draft S106 (<b>Doc Ref 8.4</b>).</p> <p>The Community Safety Management Plan (<b>Doc Ref. 8.16</b>) clearly recognises the role of EEAST, along with the other stakeholders mentioned e.g. see <b>Table 3.1: Summary of community safety roles and functions</b>.</p>	To be updated at Deadline 3	-
EE2	<p>RR3</p> <p>The level of engagement and scope of joint technical work with EEAST is therefore deficient at this stage:</p> <p>Bullet 1 - The ES is considered to be; INCOMPLETE - as it omits any assessment of the impacts arising from a coronavirus pandemic (such as Covid-19) on health partner service capacity.</p> <p>Bullet 2 - LACK ROBUSTNESS - as the ES assesses the risk of a pandemic as 'minor' which is not borne out by the evidence of infection, urgent care referral &amp; health service impacts associated with the current Covid-19 context.</p> <p>See also RR 25-27.</p>	<p>The effects of "Outbreak of disease (emerging infectious disease or pandemic influenza) pandemic" are assessed in the Major Accidents and Disasters chapter (<b>Book 6, Volume 2, Chapter 27</b>). This sets out that, during the construction phase, "Disease outbreak and infestation resulting in increased risk to the safety of members of the public and site workers" would be addressed by the Sizewell Health occupational health service. During the operational phase, in compliance with the Nuclear Site Licence conditions of the NSL, security arrangements would be established and adequate arrangements implemented for safe operation.</p> <p>Note that a future epidemic or pandemic may have different transmission vectors and require different management measures – the point of the assessment is to demonstrate that the occupational health care provision and project itself is capable of internalising the response to such an unforeseen event to avoid effects on workers and the community, including the need for additional s106 monies to external stakeholders.</p> <p>As detailed in Health Technical Note 4, Hinkley Health has demonstrated the project's ability to respond to the Covid-19 pandemic and avoid any impacts on health partner service capacity. Hinkley Point C has been commended by Public Health England and its independent regulator, the Office for Nuclear Regulation, for its response to the pandemic.</p> <p>The ES is not required to assess the effect of a pandemic on the community / health service as a whole. SZC Co. is applying for development consent to build a new nuclear power station and therefore the ES must assess the effects of the Sizewell C Project on health, including in the event of a pandemic. This has been done as set out above and evidence from HPC clearly supports the assessment</p>	To be updated at Deadline 3	-

<sup>1</sup> This column does not need to be filled out in the initial stages, the principal purpose at this stage is to set out the position of the parties

Ref.	EEAST relevant rep comment	SZC Co.'s response	Discussion / Further Action	Agreed / Not Agreed / In Progress <sup>1</sup>
		<p>of impact as minor, at worse. In fact, the HPC response also demonstrates how the presence of a major infrastructure project can be a support to the local community, including through providing PPE to health care facilities, nursing homes and schools, provision of meals and food, volunteering and fundraising through to emergency infrastructure construction support at local hospitals. Equally, such projects greatly aid in local and regional economic stability, and will aid economic recovery.</p> <p>On the above basis, the assessment is robust, no gaps have been identified, and the same measures and mitigation offered here, have been tested and proven sufficiently flexible and effective to managing risk from what was a novel virus.</p>		
EE3	<p>RR3</p> <p>Bullet 3 - INSUFFICIENT - in its proposals for mitigating &amp; managing the impacts arising on EEAST's staff, fleet &amp; estate assets which would need to provide for increased service delivery as a result of the development.</p>	<p>The key mitigation for journey times is the associated development, including, the Sizewell link road, the two village bypass, Yoxford roundabout and other highway improvements. Use of rail and sea for freight, as well as an on-site accommodation campus, use of park and rides and bussing will also keep traffic off the roads.</p> <p>Associated developments have been designed to be built off-line (i.e. their construction will not impact existing road networks) so even if something has a say 9 month or 2-year construction programme, the vast majority of that time, construction will be in fields and not affect the highway network. Tie ins will be a few weeks only and timings will be agreed through the Transport Review Group. SCC is currently reviewing SZC Co's journey time modelling and will respond formally in due course. As currently set out, SZC Co. do not believe that there will be an adverse effect on drive times / congestion leading to effects on health or other services.</p> <p>The modelling of journey time data has been revisited with additional information provided as part of the ES Addendum (<b>Doc Ref. 6.14</b>). Modelling suggests minimal journey time delays which do not require mitigation both in early years and at peak.</p> <p>With regard to community health home visits, emergency response and similar services; during construction these will not be materially impacted upon during any one trip, or cumulatively throughout the day, where the delay per trip is measured in seconds. Conversely, once operational, the improved road infrastructure offers enduring road safety and flow improvements over current provision, improving connectivity, response time and care in the community over and above what can be currently achieved.</p> <p>In terms of increased ambulance call outs to site, mitigation is proposed in the form of a S106 payment. Also see response to EE</p>	To be updated at Deadline 3	-



Ref.	EEAST relevant rep comment	SZC Co.'s response	Discussion / Further Action	Agreed / Not Agreed / In Progress <sup>1</sup>
EE4	<p>RR 3</p> <p>Bullet 4 - INCONSISTENT - with aspects of Overarching National Policy Statement for Energy (EN-1), National Policy Statement for Nuclear Power Generation (EN-6), the National Planning Policy Framework, &amp; Suffolk Coastal Local Plan.</p> <p>RR 31</p> <ul style="list-style-type: none"> <li>❖ Overarching National Policy Statement for Energy (EN-1) 2011 – Part 4 Assessment Principles &amp; Part 5 Generic Impacts.</li> <li>❖ National Policy Statement for Nuclear Power Generation (EN-6) 2011 – Part 1 Introduction, Part 2 Assessment Principles, Part 3 Impacts &amp; General Siting Principles.</li> <li>❖ National Planning Policy Framework (NPPF) 2019 – Section 8, Paragraph 92 for promoting healthy &amp; safe communities.</li> <li>❖ Suffolk Coastal Local Plan, 2020 – Paragraphs 3.52, 3.55, Table 3.6, Policy SCLP3.4 (Proposals for Major Energy Infrastructure Projects) &amp; Policy SCLP 3.5 (Infrastructure Provision).</li> </ul>	<p>Legislation and policy is set out in <b>Book 6, Volume 1, Chapter 3</b>, which also signposts to other sections of the development consent order application. Please would EEAST identify their specific concerns in relation to the matters raised in the relevant representation and SZC Co. will address these:</p> <p><a href="https://sizewellcdco.co.uk/wp-content/uploads/2020/06/SZC_Bk6_ES_V1_Ch3_Legislation_Policy.pdf">https://sizewellcdco.co.uk/wp-content/uploads/2020/06/SZC_Bk6_ES_V1_Ch3_Legislation_Policy.pdf</a>.</p>	To be updated at Deadline 3	-
EE5	<p>RR3</p> <p>Bullet 5 - ADVERSE SOCIAL &amp; ENVIRONMENTAL IMPACTS - are not therefore sufficiently 'avoided' 'reduced' or 'compensated' &amp; sustainable development is not fully delivered by the proposals at this stage.</p>	<p>Please would EEAST advise if all matters of concern in this respect are covered by this relevant rep or whether there are other matters of concern. It would be helpful if EEAST could be as specific as possible so that SZC Co. can provide an informed response.</p>	To be updated at Deadline 3	-
EE6	<p>RR4 / RR5</p> <p>In view of this, including the serious overstretching of EEAST and health partner resources, and ongoing service implications as a result of the current Covid-19 pandemic, an EXTENSION OF TIME is required to work</p>	<p>The Examination Timetable is a matter for the Examining Authority - the preliminary meetings on 23/24 March and 14 April will provide an opportunity for interested parties to present their views or concerns on procedural issues. Alongside this, SZC Co. welcomes EEAST's ongoing engagement and looks forward to discussing and resolving any residual concerns.</p>	To be updated at Deadline 3	-

Ref.	EEAST relevant rep comment	SZC Co.'s response	Discussion / Further Action	Agreed / Not Agreed / In Progress <sup>1</sup>
	with EDF Energy before the Preliminary Examination Meeting, to address the areas outlined above and below. This will be sought from the Planning Inspectorate (PINS) to enable EEAST (and the CCG's) to comment on the further information necessary to supplement the ES, and to inform the following work areas:			
EE7	RR5 Bullet 1 - Scope the work required to assess how the development can avoid, reduce or compensate for the effects of a coronavirus pandemic on the health and emergency services.	Please see response to EE2 above. SZC Co. does not consider that further work is required on this.	To be updated at Deadline 3	-
EE8	RR5 Bullet 2 - Scope the additional AIL modelling work required to determine the likely impact on EEAST (& other health/ blue light partners) emergency & non- emergency response times.	See response to EE3 on Journey Times / Modelling. AILs will be managed through the CTMP which will be agreed with Suffolk County Council and Suffolk Constabulary (draft in <b>Doc Ref. 8.7</b> ). The CTMP will include protocols for AIL movements with Suffolk Constabulary support provided where required. Please see response to EE16 below also. SZC Co. consider that this is already being addressed through work in progress with SCC / SC.	To be updated at Deadline 3	-
EE9	RR5 Bullet 3 - Scope the level of additional EEAST staff, fleet & estate assets (& additional health & blue light resources) required to mitigate the impacts arising from the development, including any 'Covid-19 specific' impacts.	SZC Co. is proposing a contribution for additional ambulance call outs to the Sizewell C Project. It is intended that evidence is drawn from HPC to define these, as set out in the Technical Note on Residual Healthcare Contribution ( <b>Book 6, Volume 2, Appendix 28B</b> ). [Note: SZC Co. is awaiting data from HPC re: rates of call outs from the Hinkley Point Project during the Covid-19 pandemic. Note however that as the workforce numbers dropped from around 5,000 to as low as 1,500 during the first lockdown, it is not expected that there were any additional impacts.]	To be updated at Deadline 3	-
EE10	RR5 Bullet 4 - The level of additional health & blue light partner additional resources required to mitigate the impacts arising from the development, including any 'Covid-19 specific' impacts, as appropriate.	Mitigation for other community safety and health and wellbeing stakeholders is being negotiated with them directly. This includes SCC (including fire service), ESC, Suffolk Constabulary and the CCGs.	To be updated at Deadline 3	-

Ref.	EEAST relevant rep comment	SZC Co.'s response	Discussion / Further Action	Agreed / Not Agreed / In Progress <sup>1</sup>
EE11	RR5 Bullet 5 - Establish appropriate Terms of Reference & Membership - for a Transport, Health & Wellbeing Group to advise on the funding, resource & infrastructure measures necessary, to adequately mitigate the impact of the development (both non- Covid & Covid 19 specific) on service provision by EEAST & its health & blue light partners.	It is proposed that EEAST sits on the Community Safety Working Group. Terms of reference for this have already been shared with the Councils and their initial comments addressed. These will be sent to EEAST with this first draft SoCG. See EE9 regarding mitigation for EEAST / EE10 regarding mitigation for other community safety and health and wellbeing stakeholders.	To be updated at Deadline 3	-
EE12	RR6 This engagement and work would be undertaken in conjunction with the preparation of an evidence base by EEAST, (in liaison with its health/ blue light partners) to inform the type and level of assets required to adequately mitigate the social and environmental (transport based) effects arising from the development.	SZC Co. has set out the evidence base that it is drawing upon to determine mitigation required, noting that the transport evidence is being scrutinised by SCC. It is suggested that EEAST should consider relying on SCC's findings in this area as they are the Highway Authority for Suffolk.	To be updated at Deadline 3	-
EE13	RR7 This approach is also supported by EEAST's healthcare and blue light partners (Suffolk & North Essex CCG's, Suffolk Constabulary, Suffolk Fire Service) and by East Suffolk Council and Suffolk CC.	SZC Co. is working separately with all of these stakeholders to establish individual statements of common ground.	Noted	No further action
EE14	RR8 / 10-15 To assist the DCO process, key facts related to EEAST's remit, priorities, staff, fleet and estate assets, service targets and co-working relationship with other healthcare and blue light partners are set out below, and at Annex 1.	Noted - this information is helpful thank you.	Noted	No further action
EE15	RR16-19 Sizewell C proposals	Note a number of errata - shown in red: 16. Sizewell C (SZC) is a nationally significant infrastructure project under the Planning Act 2008, which is understood to have a project value of £40 billion pounds. <b>Not clear what the £40bn refers to?</b>	To be updated at Deadline 3	-

Ref.	EEAST relevant rep comment	SZC Co.'s response	Discussion / Further Action	Agreed / Not Agreed / In Progress <sup>1</sup>
		<p>17. With a site generating capacity of 3,340 megawatts, and following an anticipated 12-year construction phase (2023-35) it is expected to deliver electricity to 6 million homes over its operational lifetime to 2100.</p> <p>2022 is predicted start date, based on current Examination timetable. Construction is 9-12 years. 60 year operational lifetime. 6 million homes is per year rather than cumulatively over the operational lifetime.</p> <p>A construction &amp; operational phase site area of approximately 255 ha – significantly larger than the 117 ha area nominated for the project in National Policy Statement for Nuclear Power Generation (EN-6).</p> <p>Please would EEAST confirm their specific concern over site size?</p> <p>More generally, the National Policy Statement for Nuclear Power Generation (EN-6) (NPS EN-6) identified eight sites, including Sizewell C, as potentially suitable locations for the deployment of new nuclear power stations in England and Wales by 2025. This is further supported by the Government's Energy White Paper: Powering our Net Zero Future (2020) that identifies an 'aim to bring at least one further largescale nuclear project to the point of FID by the end of this Parliament, subject to clear value for money for both consumers and taxpayers and all relevant approvals'. The justification and rationale for building Sizewell C – including the nuclear power station and related associated developments – is set out in the Planning Statement (Doc Ref. 8.4) [APP-590].</p> <p>A temporary accommodation campus &amp; caravan site for the construction workforce, with capacity for 7,900 persons serviced by 580 staff - a further 600 construction workers would be required to develop the off-site facilities (1,080 persons in total).</p> <p>The campus will be for 2,400 persons. The 580 campus staff are part of the 600 associated development staff, not additional.</p>		
EE16	<p>RR19-22 Sizewell C Impacts Summary – Transportation</p> <p>19. The proposed 'transportation impacts' are set out in Book 6, Chapter 10, Volume 2 of the ES. These are considered to have implications of a strategic scale encompassing the following construction phase impacts, in summary;</p> <p>❖ 10.1 million tonnes of construction phase material to be delivered to the site by road</p>	<p>Work is ongoing with Suffolk Constabulary and Suffolk County Council to agree the management of abnormal loads and the timing of movements. This will aim to minimise any disruption on the local road network. As with HPC, SZC Co. expects that the majority of movements would not be of sufficient size to require police escort. These would not be wide enough to preclude EEAST being able to pass these with blue lights, in a similar way to HGVs or agricultural vehicles. Where AILs require an escort, the police will be able to direct and hold traffic to enable EEAST to pass in a blue light situation.</p> <p>In terms of traffic modelling, the Transport Assessment addendum submitted in January 2021 included information on the A12 VISSIM model and the impact on journey times. This concluded that there would up to a minute's additional delay on a 14km journey which is not considered to be significant.</p>	To be updated at Deadline 3	-



Ref.	EEAST relevant rep comment	SZC Co.'s response	Discussion / Further Action	Agreed / Not Agreed / In Progress <sup>1</sup>
	<p>and rail, excluding the abnormal loads to be delivered to the site by sea via the proposed beach landing facility;</p> <p>❖ During peak construction, up to 650 two-way lorry movements are anticipated each day rising to 1,000 two-way HGV movements on the busiest days.</p> <p>❖ Estimates for the Abnormal Indivisible Loads (AIL's) including loads requiring a police escort, are currently awaited.</p> <p>20. In the absence of sufficient information on AIL's, the ES has assessed the adverse effects arising during the peak construction phase on driver and passenger delay (requiring traffic to divert onto less suitable routes) as 'minor adverse'.</p> <p>21. The ES has not, however, adequately assessed the likely impacts arising on EEAST's emergency and urgent care services, particularly category 1 and 2 tasking related to life threatening illness/ injury or emergencies, or on health and blue light partner organisations.</p> <p>22. This aspect of the transportation chapter is therefore considered to be deficient, and requires further work (to incorporate AIL modelling) in liaison with EEAST and partner organisations to identify the likely impacts, severity of impact and appropriate mitigation. The baseline environment as set out in <b>section 28.4</b>.</p>			

## APPENDIX A: ENGAGEMENT ON THE SOCG

- A.1.1. The preparation of this SoCG has been informed by a programme of discussions between SZC Co. and EEAST. The relevant meetings are summarised in Table 2.2.

**Table 2.2 SOCG meetings held between SZC Co. and EEAST**

Date	Details of the Meeting
5/8/20	Discuss DCO documentation and effects on EEAST - health, socio-economics, transport, major accidents and disasters
22/9/20	Discuss DCO documentation and effects on EEAST - health, socio-economics, transport, major accidents and disasters
8/10/20	Health Working Group
18/3/21	Health Working Group
26/3/21	SZC / A12 Vissim model run through
13/4/21	Health Working Group