



The Sizewell C Project

9.10.13 Statement of Common Ground - Suffolk Fire and Rescue

Revision: 2.0
Applicable Regulation: Regulation 5(2)(q)
PINS Reference Number: EN010012

July 2021

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



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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 development consent under the Planning Act 2008 ('the Application') for the proposed Sizewell C Project. This version 01, dated 2 June 2021, has been prepared through a programme of engagement between NNB Generation Company (SZC) Limited ('SZC Co.') as the Applicant and Suffolk Fire and Rescue Service (SFRS), referred to as 'the parties'. This is an interim version of the SoCG - subsequent versions will be submitted to the Examination in due course.

1.2 Purpose of this document

- 1.2.1 The purpose of this SoCG is to set out the position of the parties 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'). 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').
- 1.2.2 The aim of this SoCG is, therefore, to inform the Examining Authority and provide a clear position on the state and extent of discussions and agreement between the parties on matters relating to the proposed Sizewell C Project.
- 1.2.3 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.

1.3 Structure of this Statement of Common Ground

- 1.3.1 Chapter 2 provides a schedule which detail the position on relevant matters between the parties, including any matters where discussions are ongoing. This is underpinned by Appendix A, which provides a summary of engagement undertaken to establish this SoCG.

2 POSITION OF THE PARTIES

- 2.1.1 Table 2.1 provides an overview of the position of the parties and any further actions planned.

Table 2.1 Position of the Parties

Ref.	Matter raised in SCC Relevant Representation and Local Impact Report	SZC Co.'s Position	SFRS's Position	Further Action Required	Agreed / Not Agreed / In Progress
SFRS_1	Delayed emergency services response times as a result of traffic congestion, including abnormal loads.	<p><u>Journey Times</u></p> <p>SZC Co. is not predicting significant delays to journey times, even before the use of blue lights is taken into account. For example, at the peak of construction, the journey time analysis from the VISSIM micro-simulation model of the A12 corridor demonstrates that the journey time increase on the A12 northbound, between Seven Hills and just north of A1152, is predicted to be 1-18 seconds depending on the hour in the northbound direction during the early years and 1-12 seconds in the southbound direction, depending on the hour.</p> <p>In the peak construction, the increase in journey time is expected to be up to 62 seconds in the northbound direction and up to 35 seconds in the southbound direction, depending on the hour and number of HGVs on the corridor resulting from the freight management strategy.</p> <p>Over a 14km route, the effect on journey time on this part of the A12 would be negligible, which is not significant.</p> <p><u>AILs</u></p> <p>There are a range of classifications of abnormal indivisible loads (AILs) depending on their width, length and weight. The level of delay on the highway network from AIL movements will be dependent on the AIL classification. The updated Construction Traffic Management Plan (CTMP) provides a breakdown of the forecast number of AILs by classification and width. The majority (77% on average) of AIL movements by road will be <3.5m wide and a small proportion would be >5m wide (1% on average). In addition, SZC Co. will seek to utilise any spare capacity in the permanent BLF to move the largest temporary construction AILs via the BLF rather than road and this would further reduce delay on the highway network.</p> <p>To further reduce the effect of AIL movements on the highway network, the CTMP sets out protocols for the management of AIL movements to and from the main development site by road. This includes the statutory notification of AIL movements to the authorities, including the emergency services, police escort requirements for wide/long loads and time limits for AIL movements to be moved outside of the network peak hours in order to reduce their impact both on general traffic and</p>	SFRS are a Suffolk County Council fire and rescue service. Therefore comments are being fed into SCC's transport team and will be reflected in SCC's responses to the Examination. The SoCG between the Applicant and SCC reflects SFRS's position on this matter in terms of journey times/delays.	<p>Parties to discuss inclusion of SFRS In AIL communication protocols - it is noted that a look ahead will be provided to the CSWG but SFRS will need to be informed of any changes to this as it may influence response where any delays as a result of AILs en route).</p> <p>SFRS to agree with SCC transport team how incident data is fed into the potential draw down of the transport contingent funds.</p>	In Progress.

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		<p>emergency service response times. In addition to the statutory notifications, the CTMP sets out that the Community Safety Working Group, of which SFRS will be members, will be provided with a forecast of AIL movements by road for the subsequent quarter based on DMS bookings. The forecast will be subject to refinement and confirmation but it will provide a helpful tool for emergency services forward planning.</p> <p>In addition, the two village bypass and Sizewell link road are being designed to cater for the AIL movements required for the Sizewell C Project and would bypass existing AIL constraints, such as the Farnham bend.</p> <p><u>Deed of Obligation</u></p> <p>The Deed of Obligation (previously called the Section 106 Agreement) will include a transport contingency fund for the Transport Review Group to draw down from to mitigate any significant unmitigated transport effects, should they arise.</p>			
SFRS_2	Increase in traffic leading to an increased incident rate / more road traffic accidents, which will increase the service demand for emergency services.	<p>SZC Co. is proposing embedded mitigation to address this, including the provision of new roads (two village bypass), a new roundabout (Yoxford) and other highway improvements. In addition, measures to reduce traffic associated with the project are proposed in the form of the on-site accommodation campus and LEEIE caravan park, the northern and southern park and rides, a freight management site and use of sea and rail. Finally, there will be road safety funding in the Deed of Obligation e.g. for the B1078.</p> <p>In addition, SZC Co. will implement a suite of transport management plans (i.e. Traffic Incident Management Plan (TIMP) (Doc Ref 8.6), Construction Traffic Management Plan (CTMP) (Doc Ref 8.7) and Construction Worker Travel Plan (CWTP) (Doc Ref 8.8)) to manage Sizewell C construction worker and freight traffic associated with the construction of the Sizewell C Project. The transport management plans will be monitored and reviewed through the Transport Review Group (TRG). As secured in the CTMP and CWTP, the TRG will be able to draw down from a transport contingency fund to mitigate any significant unmitigated transport effects, should they arise.</p>	Emergency services are intrinsically linked and therefore it will be important for police and ambulance to agree appropriate mitigation also. Note that SFRS incidents are coded so SFRS will explore whether incidents could be coded to be linked to Sizewell C and then reported into the Community Safety Working Group. In turn this could help inform draw down of the road safety element of the transport contingency fund.	Continue to discuss and reflect in CSWG ToR and SRP.	Agreed subject to the wording of the contingency fund within the Deed of Obligation.
SFRS_3	Increase in demand of fire and rescue services as result of population	SZC Co. welcomes SFRS's support and expertise in terms of preventative work and attendance at site to ensure that risks to the	SFRS envisages that there would be peaks and troughs of demand throughout the	Governance and mechanism	In Progress.

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	increase and project site specific activities. This includes need to attend incidents and undertake preventative work. The likely increase in houses in multiple occupation may increase fire risk. In addition, the Fire Service will be required to visit the project site and to devise strategies and conduct specific training to manage the unique risks presented by the project.	<p>community, SFRS and the Sizewell C Project and properly managed and mitigated. A proposed approach to working together is set out within the draft Strategic Relationship Protocol and measures agreed within this will be supported by funding, secured in the Deed of Obligation, where relevant. Subject to the agreement of exact scope and quantum, SZC Co. considers that this approach is agreed.</p> <p>The Draft Deed of Obligation includes provision for an Emergency Services Contribution (Schedule 4) and specifically for Suffolk Fire and Rescue Service (paragraph 3.2 of Schedule 4), this includes contribution to reviewing and updating plans, responding to incidents, site familiarisation and project co-ordination. It also includes (paragraph 4.3.2) contingent funding towards public safety initiatives where there is a direct attribution to the Sizewell C Project.</p> <p>Any additional HMO must be licenced and meet environmental health standards for safe occupation, In order to aid the quality of accommodation, SZC Co. has developed a Housing Fund that will enable improvement grants and service resilience for ESC to ensure that the effects of the Sizewell C Project are mitigated, and an Accommodation Management System will include support for prospective landlords in gas safety and management of HMOs.</p>	<p>construction phase so is seeking a flexible approach to mitigation to allow it to assign resources proactively to meet community needs. In practice this would mean a contribution to resourcing which would be utilised to pull in resource as and when needed, rather than funding a specific post of posts.</p> <p>SFRS notes that SZC Co. is happy with this approach and therefore discussions will be undertaken on exact quantum and mechanisms for drawing down resource to be set out in the Deed of Obligation.</p>	of draw down for funding, and quantum to be agreed and set out in Deed of Obligation.	
SFRS_4	SCC notes joint working between SCC's Community Safety Team and The Safer Stronger Communities Board commission/deliver several services, including delivery of training and education/awareness raising packages, and working in partnership with other local authorities, Police, Fire and Rescue Service, Trading Standards, Clinical Commissioning Groups, the voluntary sector, Probation, and others to reduce crime and disorder in our communities.	The Public Services Resilience Fund allows the Councils to deploy multi-agency funding for initiatives where relevant. For example, the Draft Deed of Obligation (formerly called the Section 106 Agreement) provides for application of the Public Services Resilience Fund to complement, promote or enhance existing programmes and governance structures seeking to achieve similar outcomes within the administrative areas of East Suffolk Council or Suffolk County Council (as relevant), such as the Safer Stronger Communities Board (Suffolk) and Community Safety Partnership (East Suffolk).	Note SFRS's remit is wider than in previous years e.g. in domestic violence / safeguarding so it will be important that this is recognised in any allocation of funding. It is noted that the Deed of Obligation allows flexibility in the fund so this will be a matter for SCC when it allocates the funding. SFRS to feed into SCC on this as part of the CSWG.	No further action required (subject to no change in approach set out within Deed of Obligation)	Agreed.
SFRS_5	There are several threats and hazards during the construction phase. These include fire and / or	Emergency preparedness measures will be agreed pursuant to the requirements of the Radiation (Emergency Preparedness and Public Information) Regulations 2019 and the Nuclear Site Licence. SZC Co.	This will be dealt with through the Deed of Obligation funding as above, and should	To be dealt with through discussions on	In Progress.

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	<p>explosions at the Main Development Site or off-site Associated Development sites including unexploded ordnance, disturbance, or unidentified unexploded ordnance in the marine environment, ground stability including collapse of deep excavations and stockpiles, road traffic accidents involving construction traffic, construction incidents including major leaks and spillages within the marine environment, ionising radiation risk from radiography, train derailment or collision, and injury to members of the public using level crossings.</p> <p>There are several hazards/threats possible during the operation of Sizewell C. These include a civil nuclear incident, major accident, marine navigation risks, ground stability and disturbance of unidentified explosive ordnance during maintenance, major leaks or spillages at the Two Village Bypass and Sizewell Link Road resulting in contamination or release of hazardous substances, road safety risks caused by operational traffic.</p> <p>Hazards common to both the construction and operation phase include loss or failure of electricity transmission, gas supply, water supply, or telecommunications through contact with unidentified utilities during maintenance, emergency response activities implemented on the Main</p>	<p>have included a requirement within the dDCO submitted for Deadline 2 for emergency planning, as suggested by ESC within the Local Impact Report.</p> <p>The measures to manage risks and control impacts associated with major accidents and disasters on the main development site and off-site associated development sites, as summarised in the Mitigation Route Map, are appropriate and would be sufficiently controlled through the dDCO, Nuclear Site Licence and other legislative requirements.</p>	<p>draw on lessons learnt from Devon and Somerset colleagues from HPC.</p> <p>SFRS has not agreed to the proposal of a cap on costs arising from incidents, across the three emergency services (Deed of Obligation [REP3-24] Schedule 4, para 4.3); further discussions on this matter are required.</p>	Deed of Obligation.	



NOT PROTECTIVELY MARKED

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	Development Site impacting sensitive receptors, absent or deficient security, safety, or environmental management systems including inadequate planning, resource provision, or procedures.				

NOT PROTECTIVELY MARKED

APPENDIX A: ENGAGEMENT ON THE SOCG

A.1.1. The preparation of this SoCG has been informed by a programme of discussions between the parties, which are summarised in **Table 2.2**.

Table 2.2 SOCG meetings held between the parties

Date	Details of the Meeting
6/8/20	Q+A session on the application documents covering the socio-economics, transport and major accidents and disasters assessment.
15/9/20	Socio-economics and transport discussion.
15/10/20	Overview of proposed changes report.
26/3/21	Sizewell C A12 VISSIM model run through with emergency services.
24/5/21	SoCG discussion on first draft to be submitted at deadline 2.
05/07/21	SoCG discussion on second draft to be submitted at deadline 5.
22/07/21	Finalise SoCG.