

Deadline 8 – 24th September 2021

Application by NNB Generation Company (SZC) Limited for an Order Granting Development Consent for The Sizewell C Project

The Examining Authority's third written questions and requests for information (ExQ3)

Issued on 09 September 2021

ExA Q	Question to	Question
HW.3.0	The Applicant, ESC, SCC, CCG	<p>Health Impact Assessment</p> <p>Should a Health Impact Assessment have been carried out to fully understand the implications of impacts on human health of the proposed development both during construction and subsequent operation?</p> <p>Can the Exa be assured that all potential health impacts have been properly understood, assessed and mitigated where appropriate</p>
Response	CCG	<p>The CCG concur with the response provided by SCC as detailed below;</p> <p><i>"The Applicant's assessments of health impacts is covered through the ES Chapter 28 [APP-346] and its Appendices [APP-347]. SCC notes that our health is shaped by a range of factors and it is hard to be precise about how much each of these factors contributes to our health; this is particularly when considering the wide-ranging impacts of the construction of Sizewell C. While a Health Impact Assessment may have been helpful, SCC is not convinced that it would have provided substantial additional information.</i></p>

		<p><i>Based on the evidence provided in [App-346] and [APP-347], SCC has highlighted key areas they believe will be impacted by the development and subsequent operation and made sought mitigation measures based on these assumptions.</i></p> <p><i>SCC and the CCG, working closely together as an integrated system, recognise the interfaces and overlaps between the issues that may affect health and well-being. Our particular concerns are that the impact of the construction and the incoming workforce:</i></p> <ul style="list-style-type: none"> <i>Do not exacerbate existing inequalities in our areas of deprivation and among our vulnerable groups – for example Suffolk’s increasing ageing population with subsequent increasing vulnerabilities and complexities, young people and vulnerable adults at risk of exploitation</i> <i>Do not put additional stress on our Suffolk workforce and services</i> <i>Do not adversely impact on the ability of our communities to be a source of benefit to health and wellbeing</i> <p><i>There is an imperative therefore to ensure that robust plans are in place to:</i></p> <ul style="list-style-type: none"> <i>Deliver proactive mitigation so that members of our population are not put at risk</i> <i>Identify where timely, reactive mitigation is required through diligent monitoring of impact.</i> <p><i>SCC accepts that the proposed on-site health service provision provided by the Applicant for the workforce is expected to significantly reduce demand from the workforce on the wider health system, and is expected to result in potentially improved healthcare for the workforce.</i></p> <p><i>SCC has reached in principle agreement with the Applicant on appropriate mitigations for public health, as well as for social care with its close interlinkages with health, but still need to work through some of the detailed wording within the Deed of Obligation. We understand that the CCG is also making good progress towards agreeing a package of mitigation for the health services within its remit.</i></p> <p><i>We welcome that the Applicant has agreed to a request by the CCG in partnership with SCC to fund the provision of a post that will support monitoring the health impacts on the population throughout the development to ensure any adverse impacts can be proactively mitigated. ”</i></p> <p><i>In addition, the CCG can confirm it has made significant progress in reaching substantive agreement with the Applicant to mitigate most identified health and</i></p>
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		<p>wellbeing implications. This position is reflected in the Deed of Obligation and supporting Deed of Covenant. The CCG is grateful to the Applicant for providing a technical note to further substantiate the rationale and logic for the mitigations which have been agreed.</p> <p>It should be noted the Applicant's assessments of health impacts covered through the ES Chapter 28 [APP-346] and its Appendices [APP-347] did not consider dentistry or optometry to any depth. This has been discussed at length with the Applicant and whilst the CCG accepts the position on optometry, dentistry remains an unresolved area that the CCG has escalated to the ExA.</p>
HW.3.2	Applicant, CCG	<p>Health and Wellbeing Working Group</p> <p>Has there now been resolution in respect of the governance, scope and funding for the Health and Wellbeing Working Group?</p>
Response	CCG	<p>The CCG and Applicant have reached a shared and agreed understanding in respect of the governance, scope and funding for the Health and Wellbeing Working Group. This is reflected in the Deed of Obligation.</p>
HW.3.3	Applicant, CCG	<p>First Written Questions -</p> <p>Please provide an update in respect of the review of the approach identified in FWQ HW.1.0</p> <ul style="list-style-type: none">- (i) Has the data now been shared, and reviewed?— (ii) What is the outcome and is there now an agreed position?
Response	CCG	<p>Following several detailed conversations with the Applicant, the CCG has concurred that it is not feasible to use a Population Health Management data approach to determine the impact on the health system and as such have</p>



		concluded within the Statement of Common Ground that a position has been agreed with regards to this matter.
HW.3.4	Applicant, CCG	First Written Questions - severance Please provide an update following the response to HW1.2 and the respective positions with regard to understanding severance and the affect on local communities.
Response	CCG	<i>HW1.2 was not originally directed to the CCG and we unable to offer an update in this regard. SCC will be responding on this point and we have been notified this will be with the following;</i> <i>"The assessment of the impacts of severance on transport has been agreed and applied appropriately by the Applicant; the Council are reviewing the final ES, and have a small number of queries on impacts on links, whilst the Council are of the opinion that it is unlikely additional locations will be identified, the review needs to be completed to be completely confident"</i>
HW.3.5	Applicant, CCG	Care Homes The CCG indicated concerns with regard to the potential impact upon care homes and their residents and staff. Please provide an update on whether this concern has now been overcome
Response	CCG	The CCG can confirm it has made significant progress in reaching substantive agreement with the Applicant to mitigate most identified health and wellbeing implications. This position is reflected in the Deed of Obligation and supporting Deed of Covenant. Should the DCO be approved, in line with its Terms of Reference, the Health and Wellbeing Group will monitor local health care provision (inc. care home and implications for residents and staff) and seek the agreement of all members to take appropriate action to address areas of concern or build upon good practice.



Ipswich and East Suffolk
Clinical Commissioning Group

		The CCG are aware of the potential significant challenges in accessing Norwood House in Middleton Moor during the early stages of the scheme where the link road and the Yoxford Roundabout construction will be taking place.
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