



The Sizewell C Project

9.10.13 Statement of Common Ground - Suffolk Fire and Rescue

Revision: 3.0
Applicable Regulation: Regulation 5(2)(q)
PINS Reference Number: EN010012

October 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	Structure of this Statement of Common Ground	1
2	POSITION OF THE PARTIES	1

TABLES

Table 2.1	Position of the Parties	2
Table 2.2	SOCG meetings held between the parties	9

APPENDICES

APPENDIX A:	ENGAGEMENT ON THE SOCG	9
-------------	------------------------------	---

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 03, dated 4 October 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 the final version of the SoCG for Deadline 10.

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 at Deadline 5	SFRS's Position at Deadline 5	Position at Deadline 10	Agreed / Not Agreed / In Progress
SFRS_1	Delayed emergency services response times as a result of traffic congestion, including abnormal loads.	<p>Journey Times</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>AILs</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</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>The Deed of Obligation, Schedule 4, paragraph 4 includes provision for SFRS towards attendance at and contribution to the Community Safety Working Group (CSWG) and collation of monitoring data relevant to the Transport Review Group.</p> <p>The Transport Co-ordinator will attend the CSWG to allow the emergency services to provide feedback from a service delivery and emergency response viewpoint and provide updates on the transport management plans / monitoring data etc (as per Schedule 16, 4.3). The Transport Co-ordinator will also report to each meeting of the Transport Review Group on relevant transport related issues and actions discussed at the Community Safety Working Group, including providing the minutes of the most recent Community Safety Working Group.</p> <p>Protocols are in place as part of the Transport Co-ordinator role (Schedule 16), to keep SFRS, as a member</p>	Agreed.

Ref.	Matter raised in SCC Relevant Representation and Local Impact Report	SZC Co.'s Position at Deadline 5	SFRS's Position at Deadline 5	Position at Deadline 10	Agreed / Not Agreed / In Progress
		<p>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 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>		<p>of the Community Safety Working Group, updated on expected AIL Police Escort requirements for the subsequent quarter and monitoring data for transport indicators including AILs.</p> <p>In terms of more frequent updates, the largest AIL deliveries will be locked in with National Highways (formerly Highways England) who require 10 weeks notice. SFRS will also be sent the weekly AIL updates provided to Suffolk Constabulary, as set out in the CTMP.</p>	
SFRS_2	Increase in traffic leading to an increased incident rate / more road	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,	Emergency services are intrinsically linked and therefore it will be important for police and ambulance to agree appropriate mitigation also.	See response to SFRS_1 above. In addition, a contingent effects fund is being	Agreed.

Ref.	Matter raised in SCC Relevant Representation and Local Impact Report	SZC Co.'s Position at Deadline 5	SFRS's Position at Deadline 5	Position at Deadline 10	Agreed / Not Agreed / In Progress
	traffic accidents, which will increase the service demand for emergency services.	<p>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>	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.	provided (Schedule 16) through the Transport Review Group and SFRS will be able to provide feedback into the Group via the Transport Co-ordinator, as per SFRS_1 above.	
SFRS_3	<p>Increase in demand of fire and rescue services as result of population 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</p>	<p>SZC Co. welcomes SFRS's support and expertise in terms of preventative work and attendance at site to ensure that risks to the community, SFRS and the Sizewell C Project are 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,</p>	<p>SFRS envisages that there would be peaks and troughs of demand throughout the 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</p>	<p>The Deed of Obligation contribution for SFRS is agreed and set out in the Deed of Obligation, Schedule 4, paragraph 4.</p> <p>This includes funding for exercises on site, site visits and familiarisation, attendance at and contribution to the Community Safety Working Group, provision of off-site community safety and fire safety services, high risk site planning, training and resilience measures and</p>	Agreed.

Ref.	Matter raised in SCC Relevant Representation and Local Impact Report	SZC Co.'s Position at Deadline 5	SFRS's Position at Deadline 5	Position at Deadline 10	Agreed / Not Agreed / In Progress
	required to visit the project site and to devise strategies and conduct specific training to manage the unique risks presented by the project.	<p>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>	exact quantum and mechanisms for drawing down resource to be set out in the Deed of Obligation.	<p>collation of monitoring data relevant to the Transport Review Group by Suffolk Fire and Rescue Service.</p> <p>Funding is released on an annual basis based on a predicted spend profile but SFRS will have 5 years to use each payment before the clawback mechanism for unspent monies is enacted, providing flexibility to underspend / overspend in each individual year.</p>	
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	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.

Ref.	Matter raised in SCC Relevant Representation and Local Impact Report	SZC Co.'s Position at Deadline 5	SFRS's Position at Deadline 5	Position at Deadline 10	Agreed / Not Agreed / In Progress
	others to reduce crime and disorder in our communities.				
SFRS_5	There are several threats and hazards during the construction phase. These include fire and / or 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	<p>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. 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>This will be dealt with through the Deed of Obligation funding as above, and should 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>	<p>See SFRS_3 on the Deed of Obligation funding.</p> <p>The Parties agree that should there be UXO found on-shore or off-shore, SZC Co. will ensure that the emergency services are informed. This will be recorded in the SRP.</p>	Agreed.

Ref.	Matter raised in SCC Relevant Representation and Local Impact Report	SZC Co.'s Position at Deadline 5	SFRS's Position at Deadline 5	Position at Deadline 10	Agreed / Not Agreed / In Progress
	<p>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</p>				

Ref.	Matter raised in SCC Relevant Representation and Local Impact Report	SZC Co.'s Position at Deadline 5	SFRS's Position at Deadline 5	Position at Deadline 10	Agreed / Not Agreed / In Progress
	activities implemented on the Main Development Site impacting sensitive receptors, absent or deficient security, safety, or environmental management systems including inadequate planning, resource provision, or procedures.				

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, as 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.
19/08/21	Transport meeting and follow up discussion with Suffolk Fire and Rescue Service and EEAST.
27/08/21	Call to finalise details on DOO contributions exchanged via email.
30/08/2021	Call to finalise SOCG..

SIGNATURES

The above Statement of Common Ground is agreed between SZC Co. and SFRS on the day specified below.

Signed:

Print Name: Dave Collins

Job Title: Acting Deputy Chief Fire Officer

Date: 4 October 2021

Duly authorised for and on behalf of SFRS

Signed:

Print Name: Carly Vince

Job Title: Chief Planning Officer

Date: 30-09-21

Duly authorised for and on behalf of SZC Co.

