

EDF Energy
Sizewell Nuclear New Build
FREEPOST SZC Consultation

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Dear Sirs

Planning Act 2008

Sizewell C Stage 2 pre application consultation response

Thank you for your consultation on this matter. Suffolk Fire & Rescue Service (SFRS) would take this opportunity to make relevant representations (under Planning Act 2008) in relation to the questions posed and details provided within the public consultation.

This response will provide an emergency service response and community safety supplement to support the Joint Response by Suffolk County Council and Suffolk Coastal District Council to the Stage 2 Consultation, submitted separately to EDF ENERGY.

SFRS understand that the Sizewell C project can be an opportunity for economic benefit and are keen to support safe delivery of the project in collaboration with multi agency partners and EDF ENERGY. SFRS now seek early direct engagement from EDF ENERGY within an Emergency Service Working Group format to develop effective shared awareness of opportunities and risks associated with the project.

SFRS Stage 2 Consultation response will focus on key foreseeable specific aspects arising from the stage 2 consultation. SFRS will not duplicate key issues raised by SCC however there are some factors which require secondary reinforcing by SFRS to raise awareness of significant factors affecting delivery of statutory duties and which impact on community and responder safety.

Many of the issues raised have been identified through joint engagement as shared issues for Police and Ambulance services also.

The current uncertainty around which options EDF ENERGY will use makes it very difficult to comment with clarity so issues raised by SFRS at this stage are necessarily generic in some areas.

The lack of solid and reliable detail around transport and modal split need to be highlighted as a very significant barrier to effective consultation at this point. Transport issues are a particular area where this project could present serious impacts on SFRS emergency response arrangements and resourcing models.

EDF ENERGY need to present clear and evidenced proposals around the modal split and engage with SFRS to provide assurance for these planning assumptions.

In addition to direct answers to questions posed within the consultation there are manifold foreseeable issues which require further, and much more detailed information, and direct engagement / consultation, in order to ensure all Fire and Rescue Service (FRS) related impacts created by the Sizewell C new build project are clearly understood and fully considered by EDF ENERGY and SFRS.

This response will answer the direct questions posed in your consultation in section 1, and in sections 2-6 SFRS highlight opportunities and issues requiring more detailed information and direct engagement with EDF ENERGY.

The views expressed by SFRS are to some extent informed by the impacts observed during the development of Sizewell B, and the experience of those local communities affected during its construction. Relevant UK FRS shared experiences collated from Hinkley Point C (HPC) and other ongoing nationally significant new nuclear projects has been captured and used to inform this response.

Section 1 Response

Response to formal questions about specific proposals in the Sizewell C Stage 1 pre application consultation response.

Q1 What are your overall views on EDF Energy's proposals to build a new power station at Sizewell C and associated development?

SFRS acknowledge the national resilience needs for new and additional clean energy and therefore embrace the principles and understand the rationale for a new nuclear power station adjacent to an existing LC11 licensed nuclear site. SFRS also acknowledge the wide ranging socio-economic benefits that a project of this significance can deliver for the county.

The Stage 2 consultation unfortunately does not provide much detail at all regarding impacts on Blue Light / emergency services or public safety during the construction phases. It refers to an Emergency Services Plan (part of Public Services Strategy) (5.7.1) to be put together, and an Emergency Services Working Group (5.5.29) to be established. The development of a Community Safety Management Plan is also a critical factor to ensure safe delivery of the project and emergency services need to be engaged proactively with this planning to support EDF ENERGY and provide appropriate safeguards for the public, contractors and emergency responders alike.

SFRS would expect the Emergency Services Working Group to be established as soon as possible. Emergency planning and regulatory consultation during construction, operation and outage phases should be key considerations.

Key concerns include:

- Emergency service response times to the immediate locality and surrounding communities, which are likely to be increased due to increased traffic volumes and congestion
- Safety aspects for public, EDF ENERGY staff and emergency service responders emanating from the introduction of new high risk activities at the proposed site, for each of the emergency services
- The resourcing implications arising from the safety aspects above
- Extended community safety impacts, including road safety, residential fire safety and night time economy related potential issues
- Impacts on workforce retention in emergency services, with staff potentially being displaced to work as part of the Sizewell C development.

It is crucial that EDF ENERGY, SFRS and other partners start to work together throughout the planning and build programme to respond to issues raised by key community stakeholders and local communities as part of a continuing dialogue over the impact of the works.

SFRS are working closely with Suffolk Constabulary and East of England Ambulance Service Trust to ensure that emergency response implications of SZC project are fully considered by primary stakeholders.

SFRS is a low cost and high performing Fire & Rescue Service and has a lean, effective structure to deliver tax payer value for money and a high quality of service

which needs to be maintained throughout the project phases. The context of the SFRS mission underpins the information within this Planning Act 2008 response and can be reviewed in key documents at

<https://www.suffolk.gov.uk/assets/fire-rescue-and-emergencies/about-suffolk-fire-and-rescue-service/Statement-of-Assurance-2015-2016.pdf>

<https://www.suffolk.gov.uk/assets/fire-rescue-and-emergencies/helping-shape-the-future-of-your-fire-and-rescue-service/IRMP-v32-2015-2015.pdf>

<https://www.suffolk.gov.uk/assets/fire-rescue-and-emergencies/suffolk-fire-and-rescue-service-plan-2016-2018/Service-Plan-2016-18.compressed.pdf>

<https://www.suffolk.gov.uk/suffolk-fire-and-rescue-service/about-suffolk-fire-and-rescue-service/suffolk-fire-and-rescue-service-response-standards-statistical-reports-and-budget/our-emergency-response-standards/>

SFRS does have significant concerns about community safety consequences if the EDF ENERGY project does not embrace a proactive approach to engaging with SFRS to explore and maximise the opportunities whilst reducing the risks identified within the relevant representations presented within this response.

Significant planning engagement will be required by SFRS to ensure that foreseeable potential increased community risks are reduced and managed by proactive and collaborative engagement and resolution. To achieve this effectively SFRS will require financial support from EDF ENERGY through the Planning and performance agreement and through section 106 arrangements prior to stage 3 / Development Consent Order and then also through the build phase to deliver mutually supportive and agile joint working to manage site risks and associated community safety deliverables.

SFRS wish to be clear that new financial and resource implications which are directly attributable to supporting the SZC project in a proactive, collaborative manner will require some financial support from EDF Energy. In the current public sector financial context SFRS will be limited to delivery of statutory service without financial support for proactive collaboration which could deliver significant mutual project delivery benefits for the EDF ENERGY mission, EDF ENERGY Staff and Suffolk Communities.

UK FRS experience so far suggests that developers' focus on the level of enhanced fire and rescue risks during the construction phases of new nuclear projects would benefit from a much stronger commitment to collaborated risk management planning solutions with local Fire Authorities' support to enhance safe systems of work and compliance with the Construction Design and Management Regulations.

Q2 What are your views on the potential environmental impacts proposed mitigation at the main development site?

Every effort must be made by EDF ENERGY to avoid negatively impacting the environmentally sensitive areas surrounding the main development site.

This is primarily a matter for Suffolk County Council and other environmental enforcement agencies to administer however SFRS do have legal responsibilities to

mitigate the harmful impacts of fire and rescue activity which may threaten the environment. Relevant regulations include The Environmental Permitting Regulations 2010 and Environmental Damage (Prevention and Remediation) Regulations 2009.

The principal mechanisms for environmental pollution at incidents attended by SFRS are fire water run-off and spillage or leakage of hazardous substances arising from vehicle accidents or industrial containment failures.

It is foreseeable that SFRS will attend emergency incidents at the various development sites and access roads where containment of hazardous substances will be required and therefore more detail of containment systems that EDF ENERGY will provide is required to enable an informed response to the potential environmental impacts and appropriate mitigations. This is particularly important for the main development site and associated development in proximity to the SSSI and AONB around Sizewell Marshes.

EDF ENERGY should ensure the issue of environmental containment solutions for the proposed new access road to the main development site is addressed and clarified to ensure that environmental damage can be avoided wherever possible in the event of an incident that would threaten accidental release of substances hazardous to the environment.

SFRS would seek direct engagement with EDF ENERGY on proposed environmental containment systems as this would support SFRS tactical and dynamic environmental risk assessment and reinforce collaborative efforts to minimise environmental damage arising from the project.

Q3 Main development site New access road

EDF ENERGY need to review the issue of environmental containment systems for the proposed new access road to the main development site to ensure that environmental damage can be avoided wherever possible in the event of an incident that would threaten accidental release of substances hazardous to the environment. SFRS will need to be aware of these systems in order to carry out environmental risk assessments tactically and dynamically and mitigate environmental damage in the SSSI and AONB.

To enable effective emergency response, the proposed site access road and access roads around the main development site must be suitable for FRS emergency service response vehicles to provide adequate access to all areas of construction at all relevant times as the site layout changes and new structures are introduced.

Satisfactory access provision for the built environment is detailed within Approved document B5 Access and facilities for Fire Service (or suitable equivalent standards).

SFRS vehicle fleet all fall within the construction and use regulations for normal road vehicles with current fleet information summarised as:

- The current maximum width of SFRS vehicles - 2.55 mtrs excluding mirrors (add approx. 80cm for mirrors in full extended state)
- Maximum axle weights cannot exceed 11500kg on any single axle – SFRS vehicles range between 5000 & 10000kgs depending on type

- Length of the longest SFRS emergency vehicle is 10 metres
- Maximum height of SFRS emergency vehicle is 3.6mtrs

Current SFRS 4x4 firefighting capability is limited to 3 x Unimog vehicles; these are *not* designed for structural firefighting in the built environment and are currently available at locations in Ipswich, Lowestoft and Bury St Edmunds.

An SSSI crossing option which provides resilient and safe emergency access/egress to/from the main development site would be positively supported by SFRS notwithstanding the acknowledged requirement to balance environmental impacts against this provision.

In order for emergency responders to access the site expediently, it will be necessary for EDF ENERGY to ensure the site access road and traffic management systems are suitably designed to facilitate emergency vehicles passing other traffic and crossing the SSSI bridge without obstruction or delay.

As an emergency planning measure EDF ENERGY need to provide legacy benefit for both SZB and SZC sites as an alternative access / egress route for staff and emergency service responders during any significant incidents involving radiological release hazards to minimise risk of harmful radiological exposure and maintain any radiological dose rates 'As Low As Reasonably Practicable'. This issue is a requirement not currently met by SZB and is historically raised as learning from Fukushima in the Weightman Report¹.

In order to achieve this access requirement and safeguard continuity of operations (during build and operational phases of SZC station) at the power station platform site, mitigation of the access impacts created by a coastal surge is an important factor which SFRS and emergency service partners would expect EDF ENERGY to incorporate within the SSSI bridge access solution.

Q4 Main Development Site: Managing Construction materials

SFRS have few specific comments in relation to the borrow pit strategy excepting that any strategy which reduces extra traffic and road congestion would be beneficial for emergency responders by reducing negative impacts on emergency vehicle response times along key roads infrastructure.

It should be noted that significant earthworks of this nature do create hazards which would need to be carefully managed with safe systems of work in order to avoid exposing contractors, public and emergency responders to unacceptable risks.

Q5 Accommodation strategy

SFRS support the general principle for one larger campus accommodation for non-home based workers close to the main development site in order to reduce traffic impacts in and around Leiston and provide safe accommodation for the project workforce.

Once the accommodation strategy has been determined then the project 'Gravity

¹ <http://www.onr.org.uk/fukushima/final-report.pdf>

Model' will create additional regulatory and operational activity for SFRS and further response to Q5 can be found in sections 2-6 of this response which provides more detailed considerations for discussion with EDF ENERGY before stage 3 consultation. The accuracy and reliability of the EDF ENERGY 'Gravity model' as a planning factor resourcing assessment has not been tested by SFRS.

The accommodation strategy will need to fully consider the emergency planning and evacuation requirements of REPPIR regulations in relation to existing SZB site and also SZC once REPPIR applies at the new site.

Q6 Accommodation: Campus layout

Residential

SFRS would comment that, for any accommodation campus design and location, access and firefighting water supplies must be provided in accordance with Approved document B5 of the Building Regulations or other equivalent acceptable standards.

It should be noted that 4/5 storey accommodation would present technical training requirements for 'High Rise' procedures with local crews as this type of accommodation is not currently present in the East Suffolk area.

The provision of life safety fire sprinkler systems would be strongly advocated by SFRS in any consultation under Building Regulations related to High Rise' residential accommodation.

Suffolk Fire and Rescue Service strongly recommend that proper consideration is given to the potential life safety, economic, environmental and social benefits derived from the provision of an automatic fire sprinkler system. A system, installed and maintained in accordance with current standards, can, in the event of fire:

- Actively save lives and prevent injuries.
- Reduce property damage.
- Minimise the amount of water used to extinguish fires by controlling them when they are small.
- Reduce the environmental impact associated with toxic smoke entering the atmosphere.
- Avoid the negative social consequences associated with serious fires occurring in communities.

Furthermore, the installation of sprinklers can facilitate design flexibility and also, the flexible use of space within the building, post-occupation.

Leisure facilities

If the leisure/sports facilities are provided remote from a campus, then careful planning must be undertaken as it would be a matter of concern for SFRS that this could be a source of increased local traffic and congestion impacting on emergency response times along the B1122 and other local road infrastructure. This local legacy benefit should be delivered alongside contingency transport arrangements to minimise these congestion impacts.

Further details to support the response to Q6 can be found in sections 2-6 of this response which provides more detailed considerations for discussion with EDF ENERGY. These relate primarily to the potential issues arising from non-home based workers who reside in off campus in accordance with the Gravity Model.

Q7 What are your views on EDF Energy's overall transport strategy?

SFRS supports the request for further information made to EDF ENERGY by Suffolk County Council Highways for greater clarity of the sources and rationale of the transport strategy planning assumptions and the Modal Split detailed within the stage 2 consultation.

EDF ENERGY assurance and evidencing of the Modal Split for volume of materials transported by Road, rail and sea is critical to understand the impact on road infrastructure and emergency service response times. Until such time as this information is available it is not realistic to comment on the proposals in any detail.

SFRS broadly support the rationale for Park and Rides at Darsham and Wickham Market and the postal consolidation arrangements. Other locations may also be appropriate.

SFRS require a more detailed explanation of how traffic will be managed by EDF ENERGY during any local emergency to allow emergency responders the space to operate and resolve incidents without obstruction or delays.

Notwithstanding above, there will be site related traffic impacts to SFRS emergency response capability and resources which require greater clarity of proposals from EDF ENERGY and must be carefully explored by EDF ENERGY with SFRS before stage 3 consultation. SFRS have responded specifically to highlight these issues in section 2 of this consultation response.

SFRS do have concerns that the additional volume and types of traffic is likely to cause significant congestion with more road accidents in the area and would potentially degrade the speed and effectiveness of SFRS emergency response by causing delays in response intervention times.

SFRS emergency response infrastructure is determined by the current SFRS Integrated Risk Management Plan and this will need to be reviewed as a result of these project impacts. This will potentially be a significant planning and service delivery issue for SFRS.

Q8 Transport: Rail options

Option 1 Temporary rail extension

This option is broadly supported by SFRS as it should reduce site related HGV traffic on local key road infrastructure and on the emergency access/egress routes for the main development site.

Notwithstanding this SFRS would make a strong representation that measures need to be taken to avoid unnecessary further disruption of emergency vehicles and

responders caused by additional rail crossings of the B1122 principal emergency access route.

This rail crossing could effectively negate the benefits of using rail to reduce road traffic congestion and create a cumulative degradation impact for emergency service response along the designated route B1122 which is a key route for emergency response access to A12 and the proposed access for the main SZC development site and Campus site.

Provision of a suitable rail crossing solution which avoids delaying emergency response along B1122 is an important public safety consideration. EDF ENERGY need to work with SFRS and other emergency services to understand negative impacts from additional rail crossings and assist with mitigation.

SFRS would seek to discuss options for minimising rail crossing disruption of B1122 before stage 3 consultation to inform planning opportunities and maintain public assurance around emergency response arrangements.

Q9 Transport: Sea

The option to provide a Marine Offloading Facility is broadly supported by SFRS as it should reduce site related HGV traffic on local key road infrastructure and on the emergency access/egress routes for the main development site.

SFRS are content with the principle of building a temporary jetty Marine Offloading Facility (MOLF) - for shipping in and out construction materials and structures required for the project build phases.

SFRS are content with the principle of a Beach Landing Facility (BLF) for abnormal indivisible loads (AIL) to assist with reducing road traffic modal split and reduce degradation impacts on emergency response by road to wider community including SZC and existing nuclear licensed sites.

It is noted that the construction project could involve the movement of extremely large quantities of construction materials using a proposed Marine Offloading Facility (MOLF) for transfer of construction material by sea. SFRS acknowledge this proposal is a positive means of reducing foreseeable road infrastructure impacts.

Notwithstanding the benefits of this proposal the MOLF appears to be a very significant structure which will introduce new risks associated with shipping, hazardous cargoes, and dockyards.

SFRS would favour option 1 (temporary wide jetty) as the issues and risks arising from the introduction of a significant shipping facility with bulk material capability would be partially mitigated by the potential Modal Split benefits generated.

Firefighting and rescue activities involving incidents on vessels alongside and/or other miscellaneous operational activity on the MOLF will demand specific competencies and equipment which local crews do not currently possess as this risk does not currently exist in this area of Suffolk.

Additional training and equipment will be required to provide local crews with the necessary skills, awareness of risks and capabilities for marine environment

firefighting and rescue activity. These factors will need to be delivered by SFRS in collaboration with EDF ENERGY and with financial support provided by EDF ENERGY.

Q10 Transport: Park and Ride

SFRS broadly supports the principles of using Park and Ride facilities to reduce Key road infrastructure impacts.

Q11 / 12 Transport: Road Improvements A12 and Yoxford / B1122

The increased traffic volume on roads infrastructure across East Suffolk notably A12, A1120 and B1122 (Approved route for HGV / buses etc. with proposed new 40mph sections along B1122) will undoubtedly slow traffic down generally. The cumulative effect caused by the number of HGV and LGV large vehicles moving in slower traffic will create difficulties for emergency service vehicles to make progress through traffic on blue lights meaning that response to emergency incidents will be slower.

The nature of improvements to Junctions and traffic control systems provided will all have an effect and Suffolk County Council transport planners are best placed to comment on the most efficient options to maximise efficient traffic flows which will in turn minimise degradation of emergency response times.

Notwithstanding above, congestion and lower road speeds on the A12, particularly at Marlesford / Farnham, would compound emergency responder issues by slowing progress of supporting emergency appliances to respond from Woodbridge / Ipswich and reinforce crews responding to incidents in East Suffolk during this project build phase if an effective and efficient road infrastructure solution is not available.

Local mass public events, seasonal impacts from tourism traffic and outages at Sizewell B requiring 1000+ staff for significant periods will exacerbate the cumulative negative effects on emergency service response times and increase demands on community road safety education activity.

EDF ENERGY need to provide more details around how these very specific non SZC impacts on road congestion will be mitigated and /or managed during build phases of the SZC project.

Emergency response context of Traffic impacts

It is foreseeable that variations (enhancements) of normal emergency resource mobilising will be required at peak traffic times to mitigate congestion related response time degradation for life critical emergency incidents in the East Suffolk area. This is likely to involve additional cost to the Fire Authority as additional resources would need to be mobilised.

A slower initial response can ultimately result in larger fires or a more developed emergency scenario requiring further resources to resolve the situation and a less successful outcome in terms of life saving and / or fire damage limitation.

All options to reduce conflict between vehicles and pedestrians should be strongly

considered to reduce accidents involving the site traffic; HGV in particular.

Q13 People and Economy

Do you have any comments on our proposals including our approach to education, training and local supply chain initiatives?

SFRS support any proposals by EDF ENERGY which bring benefit and/or sustainable prosperity to local economies without compromising the business continuity of any local business or organisation. Careful and considerate cooperation with local employers should be employed by EDF Energy in order to understand positive and negative aspects of the project recruitment strategy.

SFRS do have some concerns that attraction towards employment with EDF ENERGY may have a negative impact on recruitment and retention of fire and rescue personnel in the east Suffolk area.

As the project develops it is clear there is a high risk of losing SFRS 'On Call'² emergency response personnel to EDF ENERGY by attraction to long term reliable higher salary rates and this would have serious negative effects on availability of emergency fire crews across Suffolk and in particular many of the fire stations closest to Sizewell B and C sites may be worst affected.

The recruitment and training implications of losing experienced On Call staff would be very significant for SFRS at a time when local risk and service demand in East Suffolk will increase. It would be essential to work with EDF ENERGY to explore how these staff loss issues can be avoided and/or mutual opportunities seized for collaborative reduction of unhelpful negative impacts.

Q14 Do you have any comments about this consultation process so far?

SFRS are engaged with consultation arrangements provided so far but feel there is an urgent need for much greater clarity about future consultation governance processes and Section 106 funding associated with collaborative and proactive engagement in these processes.

SFRS would seek early direct engagement with EDF ENERGY planning teams as part of an Emergency Services Working Group and also in the process of developing a Community Safety Management Plan to develop a shared understanding of opportunities arising from this project and the risks associated with not collaborating to exploit them. The outcomes of this engagement will provide constructive and mutually beneficial focus for stage 3 final consultation processes.

² On Call personnel are part time *firefighters* who respond to an alerter for emergency calls on a contracted basis of cover. They will normally have other primary occupations from which they are released perform fire and rescue duties.

Section 2

Suffolk Fire and Rescue Service Background and Key issues

This section of SFRS response identifies additional significant and foreseeable issues for Suffolk Fire and Rescue Service which would be directly attributable to the EDF ENERGY Sizewell C new build project

Suffolk Fire and Rescue Service (SFRS) delivers services to the county of Suffolk in accordance with the outcomes of Integrated Risk Management Planning processes using a national model comprising the following core functions:

Prevention This function delivers proactive and targeted fire and road safety related services, advice and guidance aimed at reducing associated risks in our communities.

Protection This function delivers regulatory enforcement of fire safety related matters in Suffolk communities using a risk based enforcement methodology.

Response This function delivers operational response resources to deal with emergency incidents in Suffolk Communities.

Sections 3-6 of this response outline aspects of Prevention, Protection and Response which require significant engagement by EDF ENERGY with SFRS before stage 3 SZC consultation and through the 10-12 year project from planning to nuclear LC11 license and power generation.

As there is considerable overlap within the SZC project work streams when aligned to the Prevention, Protection and Response this response will identify relevant EDF ENERGY project work streams for each issue identified as far as possible.

2.1. Key Project resourcing considerations overview

SFRS have currently not benefitted from the opportunity to be included in the Planning and Performance Agreement (PPA) which has provided funding for Officer / consultant time for planning and responding to EDF ENERGY consultations.

Going forward there is a clear requirement for SFRS to receive financial support from PPA settlements and Section 106 funding to enable effective engagement with consultation of key stakeholders internally and externally so that business/community safety and emergency planning issues are proactively considered as the project develops through consultation stages and build phases.

Insufficient reliable information / detail is currently available to determine detailed impacts on Suffolk communities and SFRS resources. More robust and detailed information will be required from EDF ENERGY at the earliest opportunity to enable proportionate resource planning decisions for delivery of statutory services as required by:

- Fire & Rescue Services Act;
- Fire Safety Order;
- Civil Contingencies Act; and
- REPPIR regulations
- Control of Major Accident Hazards Regulations

EDF ENERGY have not clarified what provision is proposed for Fire and Rescue emergency response resource at the main development site and surrounding major development area. This would include firefighting resources, specialist rescue, access and firefighting installations / water supplies during construction phases.

The Sizewell C project will continue to generate significant emergency planning and risk management planning and activity workloads and solutions to mitigate new risks will take to time for SFRS to deliver.

UK FRS experience so far suggests that developers' focus on the level of enhanced fire and rescue risks during the construction phases of new nuclear projects would benefit from a much stronger commitment to collaborated solutions with local Fire Authorities with local Fire Authorities.

2.2. Fire impacts

The demographic and number of workers introduced to the area are likely to increase the number of fires which SFRS will respond to.

There will follow an increase in number of statutory formal Fire Investigations and regulatory enforcement activity where businesses are involved (including residential sleeping accommodation). These investigations can be resource hungry and involve police and FRS resources.

2.3. Road traffic impacts

Road Traffic Collisions; significant extra vehicle movements including very large and some potentially slow moving vehicles in rural areas will foreseeably increase the number of Road collisions and the likelihood of large vehicles being involved in accidents requiring specialist heavy duty extrication equipment as deployed on SFRS Enhanced Rescue Tenders³

A slower emergency response would reasonably be expected to result in fires becoming larger before being tackled or other emergency situations potentially worsening before intervention resources arrive. In these circumstances it is often likely that more resources would be required to resolve the situation and be less able in terms of mitigating damage and preserving life / environment.

Response time degradation could obviously lead to an increased likelihood of significant fire damage and/or less successful rescue operations with fatal or more significant medical impacts for casualties. This outcome would be likely to generate strong negative perceptions and attention for both EDF ENERGY and SFRS from public and media which SFRS would seek to address and mitigate proactively.

As the project progresses and more certainty is developed by EDF ENERGY within the modal split proposals, SCC and SFRS risk modelling will assist in clarifying operational impacts arising from the project. These results will need to be reviewed with Police and Ambulance to ensure common emergency response factors are fully considered and adequate resolution provided in collaboration with EDF ENERGY.

³ Enhanced rescue Tenders are currently only located at Ipswich, Lowestoft and Bury St Edmunds

2.4. Prevention impacts

Proactive Community Safety activities around Fire and Road Safety including the project workforce and raising awareness of business, domestic and residential fire safety issues and standards amongst EDF ENERGY staff including non-English language speaking workers.

2.5. Regulatory impacts

Formal consultation related to Associated development including detailed building plan consultations and Access and Water supplies for new buildings outside the nuclear wire

Enforcement activity where dangerous and sub-standard fire safety arrangements are identified in local residential accommodation. Anecdotally this is an area which has already generated significant proactive risk management activity for Devon and Somerset FRS.

2.6. Project operational risk Information

Response teams will need regular updates on site developments and rapidly changing site risks without compromising core competency training schedules

2.7. Specialist rescue

EDF ENERGY need to confirm how they will dispense their duties to provide safe systems of work including emergency rescue response for their staff during higher risk construction activity such as working at heights and in confined space.

Specialist rescue training for local crews to address these new community risks cannot be sustained without variation to current on call staffing and training delivery programmes due to limited availability of staff for the training and limited capacity of training teams to deliver the new skills.

It is understood that UKFRS engaging with national new nuclear projects are discussing how they could deliver these specialist capabilities for developers as contractors have not been able to provide effective suitable rescue systems.

SFRS specialist rescue teams are located in Ipswich, Lowestoft and Bury St Edmunds but these teams are some distance away⁴ and would also require some skills uplift for response to the specific new foreseeable response risks presented by SZC project during construction phase.

2.8. Risk Management and emergency planning

In order to effectively and proactively support the project delivery and EDF ENERGY provisions under Construction (Design and Management) Regulations, significant SFRS Officer time will be required for:

- Risk Management Planning for statutory emergency response and Emergency Planning for construction project phase and ongoing REPPIR

⁴ Historical blue light emergency response times to Leiston area are circa 30-35 minutes from the two nearest specialist rescue stations.

duties including on and off site incident response planning for Sizewell B and Sizewell C

- Project point of contact to coordinate and develop collaborative supportive solutions internally with peers/planners and with EDF ENERGY and partners including other emergency services

Current fire station locations and operational infrastructure will need to be reviewed as project proposals are refined (and throughout the project phases) to maintain adequate local response times and prevent a significant degradation of emergency response provision for local communities as a result of the construction project.

A collaborative and mutually supportive approach will present opportunities for both SFRS and EDF ENERGY to deliver the SZC project safely and successfully without unnecessary disruption of:

- Emergency response arrangements;
- Project timelines; and
- Project continuity resulting from avoidable significant fire loss or safety events/investigations.

Compliance with statutory duties alone without EDF ENERGY supported proactive collaboration is unlikely to provide the most satisfactory outcome for SFRS, EDF ENERGY or Suffolk communities.

3 Community Safety (Prevention) related issues

Community Safety and Socio Economic

3.1. Overview

Suffolk Fire and Rescue Service (SFRS) have a statutory obligation to promote community safety. Across all Suffolk communities SFRS is a statutory partner in multi-agency teams supporting community safety and also enters into voluntary partnerships to promote community safety, health and wellbeing.

SFRS evaluates the risk within the county through the Integrated Risk Management Plan (IRMP) process utilising many data sources from within SFRS as well as national and locally provided partner data. Specific data sources include SFRS incident response records, traffic modelling, Police data and socio-demographic information which all contribute to our understanding of the risk in the county of Suffolk and informs our service provision.

As part of the proposed collaborative work with EDF ENERGY, SFRS appreciates the part it could play in proactively co-ordinating and mitigating community risks created by the Sizewell C project.

3.2. Evaluating the change in community risk

The Sizewell C project will substantially affect the East Suffolk communities and those areas of the county where workers settle and transport routes that carry construction and project traffic. The assessment of this enhanced risk will fall within the IRMP process but will also require specific evaluation and modelling to fully quantify the enhanced community risks that will need to be addressed. The required risk modelling will be undertaken in a number of ways and may need to include risk analysis undertaken jointly with relevant partners.

Public Service Community Safety provision during the Sizewell C project may be best served through a co-ordinated multi-service team that SFRS would be required to play a major part in.

4 Suffolk Fire and Rescue Service (SFRS) Community Safety (Prevention) Services

(Community safety / Socio Economic)

SFRS has a well developed range of community safety services or interventions that all contribute to reducing the risk to community and contracted personnel these are currently seen within three broad areas:

- Home Safety (includes all domestic / sleeping risks) with a particular focus on those most vulnerable from fire
- Road Safety
- Youth Education and Support

Prevention work will need to be undertaken in each of these areas to mitigate and limit the increase in related risks which will be created by the Sizewell C project.

4.1. Home Safety / Sleeping Risk Safety

The increase in population in the Sizewell, Leiston and sounding area is currently estimated to be between 3600 in construction and project staff with approximately 2400 of these accommodated in campus accommodation. Although Protection/fire safety managers and inspecting officers will assess compliance with the relevant standards of hostels, hotels and bed & breakfast type accommodation, Prevention/community safety managers and prevention practitioners will also be required to provide safety education.

This may be particularly relevant for any non-English speaking workers and would include the need to provide fire safety education including safe cooking practises.

EDF ENERGY should consider provision of an accommodation registration system facilitating the Prevention, Protection and Housing teams to evaluate risk and provide necessary safety inputs and ensure legal compliance for the providers housing EDF ENERGY contracted staff.

It is likely that many new premises will be offering residential accommodation for financial gain and many of these premises would require regulatory assessment and / or intervention to ensure occupant safety. EDF ENERGY need to work with Local authorities and Fire Authority to assist with targeted delivery of this activity by helping identify residential premises used by their contractors.

These effects and activities will foreseeably increase during outages at SZB and the peak tourism season in East Suffolk unless SZC project and associated workforce planning proactively allows for these peaks by varying the non-home based site workforce numbers. EDF ENERGY need to provide information to substantiate how the SZC workforce 'Gravity Model' will be rationalised during these periods of heightened local population so that a realistic total population model is available for local authority reference.

The Fire Authority will be strongly advocating the installation of residential fire sprinkler systems in the campus buildings to mitigate fire injury and minimise fire damage to critical infrastructure to reinforce project business continuity at the same time. EDF ENERGY need to provide more information about what level of fire precautions are proposed for the campus buildings. This will be especially important if the 5 storey campus option is adopted alongside applied Building Regulations compliance to safeguard the means of escape and provide compliant access and water supplies for firefighting.

4.2. Road Safety

The project road traffic management plan and the risk evaluation and modelling will inform the nature and scale of the enhanced road related risks that will be associated with the Sizewell C project. SFRS are a partner within the Suffolk RoadSafe Partnership and contribute to supporting safe road use through a number of education interventions. It is foreseeable at this stage prior to full information provision and risk evaluation that an increased road safety risk will arise for the following reasons;

- Increased traffic levels generally due to the influx and local journeys of project staff and supply chain traffic

- Substantial construction traffic with a high proportion of Heavy and large goods vehicles (LGV)
- Significant extra volumes of traffic on minor rural roads and arterial routes
- Project related drivers without local knowledge of road systems

SFRS would advocate the need for delivery of coordinated multi-service safety interventions based on focussed education. Providing a proactive approach to managing public and responder safety risk attributable to SZC requires collaborative intervention between EDF ENERGY and emergency service partners in the following areas:

- General road safety education and training
- HGV safety for schools and community groups with police to advise on large vehicle blind spots
- Road safety inductions for contractors
- LGV driver specific driver education
- Pedestrian road safety awareness
- Road related antisocial behaviour interventions

4.3. Other Activities Supporting Community Safety

Other activities that will support the community safety (prevention) delivery include;

- Fire investigation, to identify cause and impact of fires and spot any trends requiring targeted actions to reduce ongoing fire safety risks
- Reduction of unwanted fire signals to minimise disruption of and loss of working time of project staff and also to reduce road risks by avoiding unnecessary blue light response mobilisations to false alarms
- Crime reduction activities including home security delivered as part of the Safer Home Visit (SHV) programme, arson reduction and interventions to reduce road related anti-social behaviour

Some Community Safety activity may require additional resourcing to allow effective communication for non-English speaking workers to overcome language barriers and / or cultural issues dependent on make up of workforce. EDF ENERGY need to work with multi agency partners and identify suitable provision to ensure key safety messages are able to be delivered to their staff.

4.4. Community Safety (Prevention) Resources to support the Sizewell C Project

At this stage it is difficult to accurately estimate the resources that will be required to address and mitigate the increase in community risk created by the Sizewell C project. A substantial piece of work will be required to evaluate the scope and scale of the change in risk and to create the Community Safety Management Plan (CSMP) and to update this as the project develops and the risks change. The risk evaluation and the CSMP will inform and support all areas of SFRS service delivery, prevention, protection and response.

It is not possible to fully understand (from information available so far provided by the consultation) how and exactly when the resources detailed above will need to be allocated to support this project. SFRS would seek early engagement with EDF ENERGY.

5 Protection (fire safety enforcement) Considerations

Community and Socio Economic

The purpose of this section of SFRS response is to provide general guidance on the impact of the construction phase of Sizewell C upon SFRS Protection (Fire Safety) resources and the potential opportunities for supported close working with EDF ENERGY to maximise mutually advantageous use of resources.

The impact of the construction of Sizewell C has been broken down into development areas.

5.1. EDF ENERGY Sizewell C: Power Station Construction site

Whilst not covered by the normal planning and building statutory consultation processes due to Planning Act requirements, the site construction phase will still require some plan consultation on the elements that form the parts of Approved Document B: means of escape, fire alarms, fire spread (internal and external), access and facilities for the Fire and Rescue Service.

Custom and practice (Sizewell B) and current indications from national new nuclear projects would indicate that a seconded Local Authority Fire Protection / planning resource for Sizewell C site would be essential during construction phase. This resource would need to be delivered as part of an MOU with the ONR fire safety team who would be statutorily responsible for fire precautions in designated buildings inside the 'nuclear wire'. The benefits for business safety in terms regulatory compliance and project business continuity, as well as EDF ENERGY staff/contractor safety and emergency response would be tangible in terms of reducing impacts from fire and/or rescue safety events.

Further detailed information is required from EDF ENERGY on the amount and type of plan consultation required during the construction phase and the duration that this consultation would be required. SFRS would seek early engagement with EDF ENERGY to initiate these discussions.

Protection (Fire Safety) work will be delivered in line with SFRS statutory obligation as the enforcing authority with regard to the Regulatory Reform (Fire Safety) Order 2005, being mindful of the Better Regulations Delivery Office (BRDO) [working with stakeholders](#) to make sure regulation is clear, proportionate and effective. This is commented upon separately within this consultation response.

5.2. EDF ENERGY Associated Infrastructure (off-site)

It is understood that much of the non-nuclear associated development will be subject to the normal planning and building statutory consultation processes and these relevant associated development constructions will require plan consultation on the elements that form the parts of Approved Document B: means of escape, fire alarms, fire spread (internal and external), access and facilities for the Fire and Rescue Service.

EDF ENERGY consultation proposals indicate that there will be EDF ENERGY off-site associated infrastructure, potentially including a Campus, housing up to 2400

construction staff and other leisure provision. The following points demonstrate impacts which should be noted by EDF ENERGY in relation to associated development:

- EDF ENERGY associated development infrastructure would fall under the Fire Safety Order and as such add to existing enforcement activity.
- EDF ENERGY associated development infrastructure may fall under other Local Authority legislation e.g. licensing and housing. This may result in additional statutory consultation activity for SFRS.

All the above would benefit from a SFRS Protection Officer embedded into the project, providing direction and links to other agencies and assisting by providing consistency and local understanding of statutory partners' processes. This arrangement would benefit local enforcing authorities and EDF ENERGY.

5.3. Private Associated Infrastructure (off-site)

It is possible that new, privately owned and developed infrastructure is built or adapted to accommodate Sizewell C project construction workforce non home based workers (e.g. Bed & Breakfast accommodation for workers not accommodated in any Campus provision). Current proposals suggest up to 1200 non home based workers will not be residing in the campus.

The following points demonstrate impacts which should be noted by EDF ENERGY in relation to private associated infrastructure:

- Increased Building Regulations consultations in the area around Sizewell C. Private associated infrastructure would fall under the Fire Safety Order and as such add to existing enforcement activity.
- With the change in local demographic and a possible increase in business infrastructure to support this change, there is likely to be a need for specific Fire Safety business awareness education in the area. Whilst not expected to be onerous there would be cost attached to the production of materials and the auditing officers time.
- Private associated infrastructure (off site) may fall under other Local Authority legislation e.g. licensing and housing. This may result in additional statutory consultation activity (e.g. caravan sites).

SFRS would seek to echo the view of other UK FRS involved in national new nuclear developments that a mandatory housing hub or accommodation registration system should be created for non-home based staff who don't reside in the campus. This would allow stakeholder partners to deliver safer, legally compliant accommodation systems for these contractors.

It is foreseeable that the project will bring an increased level of occupancy in licensed premises even accounting for effective application of EDF ENERGY staff behavioural protocols. There is likely to be additional consultative and regulatory intervention related to licensed premises as a result of the SZC and EDF ENERGY should note that this will create additional burdens on local public authorities including the Fire Authority.

All the above would benefit from a SFRS Protection Officer embedded into the project, providing direction and links to other agencies and assisting by providing

consistency and local understanding of statutory partners' processes. This arrangement would benefit local enforcing authorities and EDF ENERGY.

5.4. EDF ENERGY Pre-consultation/professional advice

EDF ENERGY will undoubtedly seek professional advice from SFRS Protection staff as part of the pre-build/consultation. This will be advice specific to technical fire safety and to the management of the Protection response to Sizewell C. Whilst not able to quantify at this stage, times and records should be kept, recording Protection time spent on the project.

As the project develops, SFRS would seek to provide a single point of contact that will assist EDF ENERGY and ease the burden on the SFRS Protection department. A timely appointment will enable the chosen SFRS officer to build relationships with EDF ENERGY and ONR personnel, agree working arrangements, become a single point of contact for other agencies i.e. Housing, Licensing etc....

It is currently understood that Office for Nuclear Regulation ONR (under HSE umbrella) will be responsible for consulting on the fire precautions and access for firefighting related to new buildings infrastructure *'inside the nuclear wire'*.

EDF ENERGY need to clarify which proposed development infrastructure will require consultation of the Fire Authority regarding fire precautions, access and water supplies etc. under the Building Regulations. It is likely that Offices, Campus and Caravan parks etc. will require Fire Authority consultation. SFRS would seek to explore and establish formalised opportunities for collaborative working with EDF ENERGY and regulatory partners to minimise safety risks in all types of premises occupied and used by EDF ENERGY staff.

It should be noted that our understanding is that early construction phase experience at Hinkley Point C has resulted in EDF ENERGY consulting with Devon and Somerset Fire & Rescue Service in support of EDF ENERGY engagement with ONR.

SFRS would seek to explore and establish solid and formalised opportunities for proactive statutory and non-statutory collaborative working with EDF ENERGY and ONR in order to:

- Provide timely advice to EDF ENERGY allowing agile and risk assessed fire safety advice;
- Allow building infrastructure to be delivered safely for staff users without unnecessary delays; and
- Avoid regulatory non – compliance.

For 'Nuclear' buildings any advice would need to be delivered with agreement of ONR so an early and legally compliant relationship should be developed with ONR fire safety Lead Officers.

5.5. Specialist Protection (fire safety) Training Implications

The complexity of the Sizewell C Main development construction site is likely to require the attention of Protection staff with the highest level of training; SFRS can provide support with specialist knowledge of building techniques and fire engineered

solutions relating to the project. Off-site requirements are likely to be less onerous and would not require additional training.

In the event of a seconded Protection officer to the EDF ENERGY Sizewell C construction project:

- The individual may require additional training, in some construction/nuclear related areas.
- The officer would be one of Protection's more highly qualified officers; this will result in back filling of training within Protection to cover a long term secondment.
- A seconded officer will create a gap in establishment this will need to be filled and all associated expenditure should be recovered as part of the secondment. This should include foundation training for new entrant into the Protection department with significant cost to SFRS.

6 Response issues

Community and Socio Economic

It should be noted that many of the issues raised to highlight Response considerations will also be significant Prevention and / or Protection issues.

6.1. Fire and Rescue Response teams

Incident data provided by the embedded SFRS Officer at SZB site from the time of Sizewell B construction 1989 - 1994 is relevant in so far as the SZB construction project was much smaller and shorter in duration than SZC is projected to be therefore a scaling up of emergency and safety event response mobilisations can be anticipated.

The SZB project provided a Land Rover 4x4 with firefighting capability and a crew of 2 on site in the early construction stage. After 12 months this was enhanced to a full sized fire appliance provided in collaboration with SFRS. This appliance was crewed by 5 personnel on a 4 watch 24/7 shift system.

The fire/medical rescue incident data (February 1989 - March 1995) shows that the on-site crews (who enjoyed the benefit of support from an embedded SFRS officer) attended a full range of incidents. These incidents included medical assistance response to broken limbs etc., incidents involving hazardous materials, lift rescues and fires involving flammable liquids.

Over the 6-year period of SZB the on-site crews attended 616 incidents and these included 141 fire related responses.

EDF ENERGY have not provided any indication yet regarding what provision is proposed for on Fire and Rescue emergency response to the main development site and surrounding major development area. It is critically important that EDF ENERGY clarify and explore proposed fire and rescue team arrangements with SFRS at the earliest possible opportunity to inform stage 3 formal pre application consultation.

SFRS would seek to support EDF ENERGY with delivery of fire and emergency rescue provision on site to comply fully with CDM Regs from the very start of construction activities. This proactive collaborative arrangement would provide mature emergency response resources to reinforce and coordinate related contractual compliance with EDF ENERGY and project primary contractors.

Collaboration on this issue could assist EDF ENERGY project delivery with advice and / or mitigation related to construction phase difficulties providing firefighting resources and / or water supplies necessary to extinguish any fires in offices, accommodation, nuclear infrastructure and numerous vehicle / machinery and plant systems. The business continuity benefits for EDF ENERGY are clear as a simple and commonly occurring fire could present serious risks for contracted staff and project infrastructure delivery if firefighting intervention is delayed. This is especially true in circumstances where fatality, injury, or loss of significant loss of infrastructure occurs as a result.

SFRS experience is that fires and other incidents are likely to occur at major infrastructure construction sites and, to an extent, this has been the experience at

HPC. To mitigate this risk there should be a collaborative approach between EDF ENERGY and SFRS at SZC to secure appropriate firefighting response teams and firefighting water supplies available on site at the outset of the construction phase.

SFRS would seek to explore potential options for joint working arrangements with EDF ENERGY to assist with provision of resilient and mutually beneficial emergency Fire and Rescue response capabilities in order to:

- Provide prompt and competent 1st responders to initiate firefighting operations and possibly also emergency medical intervention⁵
- Minimise impacts of staff loss highlighted in response to Q13;
- Safeguard local Suffolk communities including the Main development site staff; and
- Assist EDF ENERGY to satisfy the requirements Construction, (Design and Management) Regulations
- Ensure compatible procedures, communications systems and equipment familiarity for on-site and off-site fire and rescue resources
- Train and maintain fire and specialist rescue intervention resources for the site with appropriate equipment and close links to regional and national resources for more complex emergencies arising from higher risk construction activities.

An early commitment would be required from EDF ENERGY as it would take 18-24 months to fully develop and deliver these aspirations.

6.3. Transport infrastructure

The increased traffic volume on roads infrastructure across East Suffolk notably A12, A1120 and B1122 (Approved route for HGV / buses etc. with proposed new 40mph sections along B1122) will undoubtedly slow traffic down generally.

The cumulative effect caused by the number of HGV and LGV large vehicles moving in slower traffic will create difficulties for emergency service vehicles to make progress through traffic on blue lights meaning that response to emergency incidents will be slower on many key response routes in the area affected.

The nature of junctions and traffic control systems provided will all have an effect and Transport planners are best placed to comment on the most efficient options to maximise efficient traffic flows which will in turn minimise degradation of emergency response times.

Congestion and lower road speeds at Marlesford / Farnham on A12 will compound the issue by slowing progress of supporting appliances to respond from Woodbridge / Ipswich and reinforce crews responding to incidents in East Suffolk during this project build phase if an effective alternative infrastructure solution is not delivered.

Seasonal impacts from tourism / events traffic and outages at Sizewell B requiring 1000+ staff for significant periods will all exacerbate the cumulative negative effects on emergency service response times and increase demands on Prevention and Protection activity.

⁵ Emergency medical provision would also need collaboration with East of England Ambulance Trust

EDF ENERGY need to provide more details around how the impacts from tourism / events traffic and SZB outage on road congestion and accommodation infrastructure will be mitigated and /or managed during build phases of the project.

6.4. Emergency response context of Traffic impacts

If variations (enhancements) of normal emergency resource mobilising will be required at peak traffic times to mitigate congestion related response time degradation for life critical emergency incidents in the East Suffolk area, then this is likely to involve additional cost to SFRS as additional resources would be mobilised.

A slower initial response can ultimately result in larger fires or a more developed emergency scenario requiring further resources to resolve the situation and a less successful outcome in terms of life saving and damage limitation.

It is clear from consultation proposals that many hundreds of extra Large Goods Vehicle movements (buses and vans) and possibly thousands of extra private motor vehicle movements per day will affect the local road infrastructure. These journeys will cause congestion due to additional volume and the slower speed of many of the larger vehicles. It is likely that peak traffic times may correlate with shift change times; especially during construction phases where the project workforce numbers are at higher levels.

Notwithstanding the proposals designed to minimise traffic related impacts around the area it is clear that this extra traffic will have a significant impact on SFRS ability to meet specified attendance times for emergency response.

SFRS operational response performance targets are designed to drive expedient emergency response and resolve emergency situations as swiftly and successfully as possible by delivering a risk assessed speed and weight of response to all different incident types. Maintenance of these standards will be rigorously pursued when reviewing response and resource arrangements to meet the needs of the SZC project from start to finish.

These standards can be found using the following hyperlink:

<https://www.suffolk.gov.uk/suffolk-fire-and-rescue-service/about-suffolk-fire-and-rescue-service/suffolk-fire-and-rescue-service-response-standards-statistical-reports-and-budget/our-emergency-response-standards/>

6.5. Operational risk information management

Operational Risk inspections will need to be undertaken by Risk Inspectors and also local crews in accordance with section 7 (2) (d) of the Fire and Rescue Services Act for certain buildings or risk areas presenting higher levels of risk to responding SFRS crews. These inspections generate an operational information file containing information on operational hazards, water supplies, access and egress routes etc. at each site.

The project as it develops will create significant new localised operational risks around the main development site including:

- Marine risks firefighting if MOLF / BLF are used by EDF ENERGY
- Specialist technical rescue

- Advanced working at height (Tower cranes and construction)
- Confined space firefighting and rescue in extensive deep sub surface excavations and tunnelling
- Mud / water / ice / trench rescue in excavation sites / pits
- High rise⁶ firefighting operations

Site specific operational risk information captured is provided in the form of annotated plan drawings, risk cards and hard copy files and made available in a mobile format for reference by SFRS crews when:

- Familiarising with site risks for preplanning safe and effective systems of work; and
- Responding to any emergency incident at these sites, allowing expedient dynamic risk assessment

This information will be held securely and made available to all relevant SFRS staff for their action and information.

The risk information will need to be collated through close cooperation and liaison with site representatives involving site visits, meetings, telephone and electronic correspondence to ensure current information about site risks is available to emergency responders. This may include the existing nuclear power station site at Sizewell B where any Sizewell C project activity has an impact on response arrangements for these sites.

This undertaking will generate significant additional work streams for the Resilience Command team, Business Support team, Computer Aided Design, and Secretariat throughout each phase of the Sizewell C construction project as the site evolves and the risks change until completion.

There will be a requirement for regular site visits and on site exercising by local crews and the SFRS officer cadre as the project develops to ensure their operational risk awareness (access, hazards, water supplies, new construction etc.) is maintained as the site evolves through each phase of the construction project.

These familiarisation visits must not interfere with core competency training programmes which do not have the spare capacity to accommodate extra visits on a regular basis. As such these visits will need to be carried out additional to existing training at mutually agreeable times and will need to be financially underwritten by EDF ENERGY as a section 106 funded arrangement.

6.6. Emergency Planning and business continuity impacts

SFRS fully support the Sizewell C Stage 2 consultation response provided by the Suffolk Resilience Forum (SRF) in relation to emergency planning impacts and considerations for multi-agency response to significant incidents and events at existing Nuclear Power stations and in surrounding areas. Where possible this response will avoid duplicating the content of the SRF response.

The Civil Contingencies Act 2004 place a statutory duty upon SFRS as a key stakeholder and consultee in ensuring that emergency response plans for

⁶ High rise firefighting techniques applied as standard to any building of 4 floors or over

foreseeable emergencies are developed in a timely and fully considered manner at each stage of the Sizewell C construction project. This will include maintaining, reviewing and testing the efficacy of the existing emergency plan arrangements for Sizewell A and B sites whilst developing and integrating new arrangements for Sizewell C at each stage of the construction project.

Emergency response plans for each site will need to be developed and reviewed so they are compatible and complementary to each other and the requirements of the Radiation (Emergency Preparedness & Public Information) Regulations 2001 (REPPiR) to ensure safe and effective emergency response to any incident.

It is also foreseeable that additional specific emergency planning and liaison activity will arise from protestor and lobbyist activity which may threaten security and/or compromise access at the various Sizewell power station sites as the project progresses. It is foreseeable that this issue may increase in significance as the project progresses.

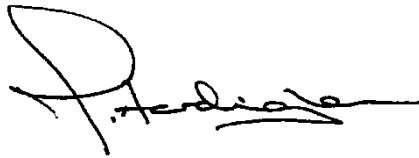
To support the above planning requirements, it is foreseeable that the SFRS Risk and Resilience Manager (Emergency Planning and Business Continuity lead officer) will become a key point of contact for EDF ENERGY and will be required to dedicate a significant amount of time to managing the project throughout each stage of its evolution.

SFRS look forward to receiving prompt EDF ENERGY feedback to this response detailing the information required by SFRS to inform service planning and future collaborative engagement opportunities to progress this project.

Yours Faithfully,

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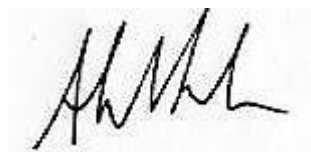


Chief Fire Officer

For contact purposes and feedback regarding this response and future engagement / consultation with Suffolk Fire and Rescue Service please contact:

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