



The Planning Act 2008

Sizewell C (SZC)

Planning Inspectorate Reference: *EN010012*

Deadline 5 – *23 July 2021*

Written summary of oral case

ISH 4 Socio-Economic and Community Issues, 9 July 2021

ISH 4 Socio-Economic and Community Issues

| Agenda Item | East Suffolk Council |
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| <p>1. Introductions</p> | <p>Speakers on behalf of East Suffolk Council (ESC)</p> <p>Andrew Tait QC Isabella Tafur of Counsel Paul Wood, Head of Economic Development and Regeneration Richard Best, Collaboration and Connecting Programme Manager, Communities</p> |
| <p>2. Impacts on and opportunities for:</p> <ul style="list-style-type: none"> • The local economy, including local businesses and the local supply chain • Employment impacts during construction, and operation, including employment churn • Required skills and education initiatives, skills enhancement packages, prior to and during construction, | <p><u>Local economy - opportunities</u></p> <p>The development presents an enormous opportunity for the local economy (LIR paragraph 23.1 [REP1-045]). There is potential for investment in the local economy as part of the construction programme and associated local and regional supply chain opportunities (LIR paragraphs 23.1-23.2 [REP1-045]).</p> <p>Opportunities for the local economy from the construction project include (LIR paragraph 24.8 [REP1-045]):</p> <ul style="list-style-type: none"> • Opportunities for growth in non-nuclear related businesses associated with supporting the delivery of the project, for example, local catering, leisure and retail companies. This provides benefits to the wider economy and population as well as the nuclear supply chain. • Opportunities for growth in existing and newly accredited nuclear related businesses associated with delivering the project. • Opportunities for businesses to grow in other sectors now that they have the experience of working to a higher nuclear standard. • Opportunity to create new consortia (Food, Transport, Engineering, etc.) with businesses being created from grass roots partnerships and pitching for entry to the supply chain. |

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| <p>operation, and post construction</p> <ul style="list-style-type: none"> • Tourism impacts prior to and during construction, and post construction, the methodology of assessment and suitability of the Tourism fund • Effect on rail services and capacity for infrastructure improvements during the construction period • Monitoring and mitigation measures | <ul style="list-style-type: none"> • Legacy across all identified growth. A significant opportunity is companies new to the nuclear and energy supply chain providing them with opportunities for future growth in the global nuclear supply chain as well as linking to wider Clean Growth and Net Zero delivery. • Enabling Freeport East to become a centre of technical excellence for the wider energy industry and support technical innovation which can be exported globally. • Consolidation of Suffolk’s Energy Cluster linked with offshore and onshore renewables. The Applicant is a lynchpin tenant in the region and can accelerate inward investment of Tier 1 and 2 suppliers working on multiple energy infrastructure projects. <p>While there are significant opportunities for the local economy, these must be viewed as opportunities rather than confirmed benefits (LIR paragraph 23.3 [REP1-045]). As such, ESC expects these opportunities to be maximised and the Applicant to increase their ambitions in the area.</p> <p><u>Local economy – adverse impacts</u></p> <p>Whilst there are many significant economic opportunities arising from the Sizewell C development, given the scale of the development and the resulting demand by the project for workforce resources, it is likely that there will be several negative impacts for the local economy, including churn issues and resulting displacement of the workforce of other sectors, and disruption to the supply chains of other sectors (see SE.1.28, REP2-176).</p> <p>Negative impacts to be mitigated (LIR paragraph 24.10 - 24.14 [REP1-045]):</p> <ul style="list-style-type: none"> • Lift and shift of non-unique suppliers within the Hinkley Point C supply chain, which risks undermining local economic opportunities both with the build and in legacy. • Workforce Churn creating displacement – may lead to businesses struggling to fill vacancies as Sizewell C takes up the local labour force. |
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| | <ul style="list-style-type: none">• Disruption within the supply chain in the local area - where goods are needed to support Sizewell C, they may become more difficult to obtain locally as a result of that demand, adversely affecting local businesses.• Local economic congestion caused by increased journey time and reduction in route reliability. This may cause a perception amongst businesses and investors that the area is an inconvenient location for travel and business. This could result in businesses relocating away from the district or development area if they are incurring significant costs from delays. There is a lack of resilience in the road network in east Suffolk and the sometimes-unforeseen impacts of construction such as Abnormal Indivisible Loads, and challenges with moving infrastructure to the site, should not be underestimated in relation to negative business impacts at this stage in the planning and delivery of the project. It is acknowledged that this aspect is directly linked to the construction management plan proposed for the project. ESC is seeking to ensure there is business resilience built into the economic cost of congestion rather than just a road improvement solution. <p>Local businesses</p> <p>Opportunities would include additional spending in the area from non-home-based workers. A large proportion of the cost of the build will be in salaries for the substantial workforce which should generate additional spend in the local and regional economy, if they are encouraged and supported to do so [LIR paragraph 24.7 [REP1-045]). The Applicant is encouraged to work with the Councils on innovative schemes to encourage non-home-based workforce to spend money locally.</p> <p>As set out in the LIR paragraph 25.14 ([REP1-045]), workforce displacement and churn could adversely impact local businesses and create disruption/displacement in the wider supply chain. ESC is concerned that further, increased levels of skilled labour leave their current employment potentially causing local business continuity issues.</p> <p>ESC seeks to secure a mitigation plan to realise local economic benefits and mitigate adverse impacts.</p> |
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| | <p>There is potential for a boom-and-bust impact as the project demobilises giving rise to unemployment in the local area. The boom-and-bust effect could occur as substantial contracts for local businesses and the large sized construction workforce are wound down (LIR paragraph 24.20 [REP1-045]). This effect may be experienced during any point of the construction period when a phase demobilises e.g., when Civils demobilise.</p> <p>Local supply chain</p> <p>ESC expects the Applicant and its contracted supply chain partners to work transparently and collaboratively with ESC, and its partners across the region, to ensure the opportunities presented by Sizewell C are maximised (LIR paragraph 23.7 [REP1-045]).</p> <p>The project has the opportunity to leave the legacy of experienced and accredited businesses positioned to enter the global nuclear supply chain and access wider local and national energy project opportunities (LIR Table 25, Row 25g [REP1-045]).</p> <p>ESC recognises that the experience, accreditation, and expertise that suppliers will gain from the project will be exportable and enable local companies to enter much larger supply chains (LIR paragraph 24.6 [REP1-045]). Tangible mechanisms for ensuring that the skills base developed for Sizewell C is as transferable as possible to other key sectors in the local economy are required.</p> <p>There are also a number of negative impacts that will need to be mitigated. These include the lift and shift of non-unique suppliers within the Hinkley Point C supply chain, which risks undermining local economic opportunities with the build and in legacy.</p> <p>The Applicant's activities are currently only focused on adding local businesses into that supply chain. While this is supported, the Council see this as too-narrow a focus and as such a missed opportunity for the local economy. A more proactive approach would mean that, in addition to adding those local businesses into the Sizewell C supply chain, the Applicant would provide support through investment and to enable</p> |
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| | <p>them to grow their offer so they can supply the Applicant's project as well as service their existing markets, by expanding and employing more local people (LIR paragraph 24.5, [REP1-045]).</p> <p>ESC is keen to maximise opportunities for local businesses and continues to encourage the Applicant to work with partners (particularly NALEP) to maximise opportunities by developing an effective business growth and investor development service. ESC encourages the Applicant to engage in inward investment activities to maximise local economic benefit and potentially create a legacy benefit for the local economy. Supply chain and inward investment must work together to maximise opportunities (LIR paragraph 24.6, [REP1-045]).</p> <p>A robust and correctly resourced Supply Chain Strategy, secured via the deed of obligation, which sets out clearly SZC Co. Ltd's objectives, approach, measures, governance and monitoring alongside the role of regional and local partners will ensure that negative impacts are mitigated adequately, and that the region capitalises on the catalytic effect of hosting new nuclear.</p> <p>The current objectives of the Supply Chain Strategy (Document 8.9, Appendix B) fail to encompass the points that have been set out above and during previous rounds of public consultation. This is reflected in question 1.27 in ExQ1 which asked for further details from the Applicant on the delivery and monitoring of the supply chain strategy. The Applicant's response to these questions merely refers back to the strategy rather than providing further clarification, as requested by the ExA.</p> <p>ESC considers gaps to exist in the economic development provision associated with Sizewell C and that these should be addressed via the proposed Economic Development Programme, enabled via financial support from the Applicant (amount to be determined) for the term (+ 12 months) of the build, along with the Economic Cost of Congestion to Businesses Contingency Fund to be held and administered by the Applicant. This is still under discussion with the Applicant, but we are confident that if we can agree an appropriate magnitude for the Fund we can mitigate the negative impacts of the project on the local supply chain.</p> |
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| | <p>The impact of the Economic Development Programme is considered to be wholly positive for the Councils, NALEP, for SZC Co. Ltd and for the communities, businesses and people associated with development and operation of Sizewell C. Creation and delivery of the Programme will enable the Councils to effectively manage the economic risks, mitigate negative impacts, and maximise the economic opportunities resulting from Sizewell C in line with the partner’s Statement of Economic Intent.</p> <p>Employment impacts during construction, and operation, including employment churn</p> <p>The project will generate significant demand for labour across a range of employment sectors and skill levels (SE.1.31 [REP2-176]). There will also be labour demand for operational workers once the power station is built providing positive local and regional benefit through the creation of more jobs, opportunities for upskilling, and increased competency within the local supply chain.</p> <p>ESC is concerned that the project will create high levels of labour market churn, where increased levels of skilled labour leave their current job potentially causing local business continuity issues. When this happens in high levels negative displacement may occur if local employers have vacancies they cannot fill potentially causing a reduction in economic activity (LIR paragraph 25.14 [REP1-045], SE1.28 [REP2-176]).</p> <p>ESC is content that the assessment of effects on the labour market has been undertaken following all guidelines and best practice advice. However, given a project of this magnitude and time scale has many variables to consider, a number of which are beyond of the direct influence of the Applicant and local authorities, ESC is concerned with the validity of any conclusions drawn from this assessment in the long term (SE1.29 [REP2-176]).</p> <p>ESC is concerned about the unprecedented level of development in the area and its potential impacts and demand on the labour force from all energy projects in Suffolk – including the East Anglia offshore wind farms, Vattenfall, and others (SE1.39 [REP2-176]).</p> |
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| | <p>Required skills and education initiatives, skills enhancement packages, prior to and during construction, operation, and post construction</p> <p>ESC agreed with the points raised by SCC on this item.</p> <p>In addition, ESC is keen for mitigation to include bursaries for local people to access training and opportunities to have training based in Leiston and the local area to avoid having to travel out of the area.</p> |
| | <p>Tourism impacts prior to and during construction, and post construction, the methodology of assessment and suitability of the Tourism fund</p> <p>There are positive impacts related to year-round bed occupancy in the tourism market and the potential for some small-scale construction tourism (LIR paragraph 26.2 [REP1-045]).</p> <p>The impact of the construction period of the development is considered to potentially be significantly adverse and needs to be addressed through the proposed tourism fund (LIR paragraph 23.5 [REP1-045]).</p> <p>The Council is concerned about the potentially significant negative impact of the development on the tourism sector. The value of the tourist visitor economy in East Suffolk is estimated at £695m and it supports approximately 11,000 FTE jobs (15% of employment) in East Suffolk (LIR paragraph 26.4 [REP1-045]).</p> <p>The Applicant commissioned a visitor survey from Ipsos/Mori in 2019 (LIR paragraph 26.7 [REP1-045]) . The survey used both qualitative and quantitative methods to collect and assess visitor attitudes towards visiting the Suffolk Coast area during construction of Sizewell C. Its results almost exactly mirrored those headline results from the 2019 visitor and business energy projects survey commissioned by the Suffolk Coast DMO (Destination Management Organisation). The Applicant’s survey resulted in a forecast 17% reduction in overall willingness to visit which, in the DMO survey, was considered to equate to a significant</p> |

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| | <p>economic loss every year during construction (an annual loss (modelled) of between £26m and £48m to the visitor economy in East Suffolk).</p> <p>Independent Research commissioned by The Suffolk Coast DMO in partnership with the National Coastal Tourism Academy and Suffolk Coast and Heaths AONB has indicated that the potential harm to the visitor economy because of the impact of energy projects could range between £26 million to £43 million a year. This is considered to be the most accurate estimate available along with associated economic impact estimation work. The Applicant's own Visitor Survey [APP-268] did not reach financial conclusions on the economic impact of the project but the net loss of visitors reported, mirrored the Suffolk Coast DMO's report to within 1%. We consider these consistent findings to provide a reasonable indicator of the potential impact of the construction work on visitor numbers.</p> <p>The principle of delivering mitigation in the form of a tourism fund has been agreed in the SoCG (SE25, p137 SoCG [REP2-076]). The scale of the fund is subject to ongoing discussion with the Applicant and will affect the magnitude of residual effects.</p> <p>The tourism fund will have a programme manager (ESC) and a marketing officer that will sit within the DMO to determine the outputs required for managing the mitigation (assuming the fund is of sufficient size to pay for a marketing officer).</p> <p>The Council is concerned about the negative impacts on tourist accommodation during construction and a "boom and bust" effect on parts of the tourism sector at the end of the construction period. Sizewell C workers are likely to use tourist accommodation during construction, resulting in a reduction in accommodation for traditional tourists. Accommodation providers may, during the construction period, have become reliant on business related to the construction workforce of Sizewell C (LIR Row 25r of Table 25 page 351 [REP1-045]). This will, at least to a degree, have displaced regular tourist visitors who may have stayed previously at these businesses. The immediate impact on the sector on demobilisation could potentially be severe. The proposed tourism fund should include provision to mitigate the impacts at this post-construction period (LIR paragraph 26.12 [REP1-045]).</p> |
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| | <p>These issues can be mitigated by ensuring sufficient campus accommodation is delivered at an appropriate time to manage the number of non-home-based workers in tourist accommodation, and by providing investment in marketing and business support to the tourism sector to minimise the loss of visitors to the local area (LIR paragraph 26.14 [REP1-045]). In addition, the Housing Fund will include an element designed to promote and support local tourism accommodation providers in expanding or refurbishing etc in order to provide accommodation for Sizewell C workers.</p> <p>Effect on rail services and capacity for infrastructure improvements during the construction period</p> <p>Although this item was not addressed in the absence of Network Rail, ESC’s position is that in principle an increase in rail and sea freight would be of benefit to local communities and the economy by reducing congestion on the roads, particularly at peak times for tourism and the agriculture-based businesses in the locality (SE.1.42 [REP2-176]). This benefit would be difficult to quantify until construction begins, as throughout a project of this size and scale, unexpected and unplanned loads may need to travel by road that are not suitable for rail or sea – and this is likely to have a negative effect on communities and tourism.</p> <p>Any suggestion of a fifth train needing to run during normal operational hours requiring the cancellation of a pair of passenger train services between Lowestoft and Ipswich would be strongly resisted. The passenger service is used for social, leisure, business travel and commuting.</p> <p>Until plans are clearer as to exactly what will travel by rail and sea, it will remain impossible to say whether there will be any economic benefit or whether tourism impacts will be reduced. Even small changes and congestion will affect perceptions of tourism, as messages about it are uncontrolled and people will decide not to visit based on their own experiences of congestion.</p> <p>Monitoring and mitigation measures</p> <p>ESC has addressed the issue of the need for a tourism fund (schedule 15 of the Deed of Obligation). With regard to Schedule 7, ESC wishes to see the supply chain strategy expanded to cover deficiencies. There are ongoing monitoring and governance discussions with the Applicant.</p> |
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| | <p>A mitigation plan should be secured to increase local economic benefit and mitigate adverse impacts on the local economy.</p> <p>A robust and correctly resourced Supply Chain Strategy, secured via the deed of obligation, which sets out clearly SZC Co. Ltd.'s objectives, approach, measures, governance and monitoring alongside the role of regional and local partners will ensure that negative impacts are mitigated adequately, and that the region capitalises on the catalytic effect of hosting new nuclear.</p> <p>The current objectives of the Supply Chain Strategy (Document 8.9, Appendix B) fail to encompass the Council's objectives (outlined above and during previous rounds of public consultation). It also fails to provide sufficient detail of how the strategy, as set out, will be delivered, monitored and the measures used.</p> <p>ESC suggests that the following should be included within a revised Supply Chain Strategy (under discussion with the Applicant):</p> <ul style="list-style-type: none">• Introduction (Para 1.1) – this should recognise that a Supply Chain Strategy is wider than the facilitation of engagements through a programme of developing activities.• Objectives (Para 1.1.6) – Inclusion of:<ul style="list-style-type: none">○ An objective that recognises there is a need to mitigate adverse impacts on the supply chain,○ An objective that recognises the significant catalytic opportunity that this project will provide for Suffolk and Norfolk,○ An objective to support the region's commitment to driving the transition to net zero, with a supply chain strategy that enhances the region's clean growth credentials.• Replication (Para 1.2.5) – Clear commitment that replication of features from HPC does not lead to lift and shift of non-unique elements of goods or services |
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| | <ul style="list-style-type: none">• Local/Regional Supply Chain (Para 1.3.1) – Clearly define the measures that have been and will be implemented to deliver the primary goals of assisting local businesses in successfully contracting for supply of goods and services and attracting inward investment. Currently the strategy only contains commitments for:<ul style="list-style-type: none">○ A supply chain website○ A managed portal that would broker business support without making it clear how and who funds this brokered support○ Promotion of consortia opportunities without making clear how and who builds this consortia○ Promotion of local and regional suppliers to Tier 1 contractors without clearly identifying how this will be done and what will compel this request.• Current monitoring and reporting as set out in the strategy is merely an exercise in recording and reporting UK content. There is nothing specific in the monitoring and reporting aspects of the strategy that would be useful to the partners to either act as a measure of actual impact of the negative and positive impacts discussed. A list of suggested independent monitoring outputs is included below at Table 1. <p><u>Mitigation</u></p> <p>ESC seeks funding from the Applicant to deliver an Economic Development Programme function sitting within ESC. This would enable coordination to ensure all initiatives and activities are focussed appropriately and are effective (under discussion with the Applicant as part of an Economic Development Fund ask). This is considered key to successfully managing numerous economic development issues associated with Sizewell C. The Economic Development function proposed will avoid inefficiency, increase effectiveness and help to maximise opportunities. It is important to create greater reach and activity on business support around the Sizewell C project through a dedicated Economic development business support service. This function would</p> |
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| | <p>coordinate support for businesses negatively impacted (because they face competition for resources or lack the capacity or capability to react, 'boom and bust', 'lift and shift').</p> <p>ESC also requests a contingency Congestion Fund from the Applicant (under discussion with the Applicant) - offering support to East Suffolk Businesses which are able to demonstrate that they have experienced a negative impact on their business activities because of additional traffic, congestion or disruption caused by Sizewell C (similar principles will be highlighted in respect of impacts on public services from congestion). This Fund should be administered with the Applicant and be reported through the proposed Transport Review Group.</p> <p>The principle of mitigation in relation to tourism has been agreed in the SoCG – however the scale of mitigation funds will determine whether significant effects can be mitigated. The tourism fund should be administered by a programme manager (ESC) and a marketing officer within the Destination Management Organisation (funded by the Applicant) to determine the outputs required for managing the mitigation.</p> <p>Monitoring:</p> <p>The Council supports the creation of an informal group consisting of EDF Energy NGL, SZC Co. Ltd, ESC, SCC, NALEP, Suffolk Chamber of Commerce and additional business intermediaries which represent a wider cross-section of businesses across Suffolk and Norfolk to ensure that there is a clear line of communication around Sizewell C opportunities to a wide business base. This would provide clear tangible benefits for SZC Co. Ltd, Tier 1 and Tier 2 suppliers through increased local participation, enhanced choice, and reduced costs; provide possible inward investment and trade stimulation successes; support business growth; and increased employment opportunities for the local workforce.</p> |
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| <p>3. Community issues</p> <ul style="list-style-type: none"> • Demographic modelling (including gravity model) and implications of minor changes in forecasting • Housing and accommodation strategy, including location, size and timing of provision of the accommodation campus and caravan site at the LEEIE • Influx of non-home-based workers • Emergency services impacts, and implications for community safety • Sports and recreation provision and assessment • Health effects of a 9-12 year construction period on the local community | <p>Demographic modelling (including gravity model) and implications of minor changes in forecasting</p> <p>ESC agrees the approach to modelling the spatial distribution of the workforce (SE7, SoCG [REP2-076]).</p> <p>The approach provides a sufficient assessment based on the information available at the time of submission. However, any modelled approach has its limitations which means that where significant effects are considered likely, a ‘plan-monitor-manage’ approach is to be secured through the Deed of Obligation (p.137, SE7, SoCG [REP2-076]).</p> <p>ESC commissioned Aecom to conduct a piece of work assessing and testing the robustness of the gravity model for this purpose (Appendix 2:10 LIR [REP1-098]). The assessment noted that if job numbers were to increase, there could be a situation where the number of workers in an area exceeded available accommodation. Any change in the assumptions used in the Applicant’s gravity model, such as a change to the number of Non Home Based workers would impact the outcome of the model (LIR paragraph 15.52 [REP1-045]).</p> <p>ESC (with SCC as lead) has agreed the approach to the highway traffic modelling including the gravity model in the SoCG (.151-152, TM01, TM02 SoCG [REP2-076]). ESC notes the gravity model is only an estimate and the potential for more or less condensed distribution of the workforce will have implications on the transport network.</p> <p>ESC has an older population than the county, regional or national averages. Having a demographic dominated by retired individuals who are more likely to be at home for long periods, may predispose the community to experience a greater level of impact than in other locations (LIR paragraph 30.7 [REP1-045]).</p> <p>Housing and accommodation strategy, including location, size and timing of provision of the accommodation campus and caravan site at the LEEIE</p> <p>The impacts of the SZC construction on housing and accommodation is primarily identified in the Applicant’s Accommodation Strategy [APP-613]. The Council’s concerns relate to the displacement of</p> |
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| <ul style="list-style-type: none"> • Effects of the freight strategy on the health and wellbeing of the local communities • Monitoring and mitigation measures | <p>tourists and residents as a result of the significant number of constructions (7,900 at peak construction, of whom 5,880 are anticipated to be non-home-based workers seeking local accommodation).</p> <p>The Accommodation Strategy acknowledges that in Leiston and Aldeburgh, workers are likely to take up tourist accommodation equivalent to 41% and 21% of the affordable stock of tourist accommodation, even if their embedded mitigation (i.e. the accommodation campus and caravan site) is delivered (Accommodation Strategy, APP-613), paragraph 4.2.21). The Environmental Statement recognises that there will be minor to major adverse impacts on the tourist sector at local level, even taking account of the embedded mitigation (ES, Chapter 9, APP-195), Table 9.52, page 156).</p> <p>The Applicant also recognises a major impact on the private rental sector in Leiston, Aldeburgh, Saxmundham and Yoxford and moderate adverse impacts at Rendlesham and Snape (see Community Safety Management Plan APP-635) at paragraph 4.2.4). In these areas, there is a danger that workers will compete for the same lower-end housing market as those with registered housing needs and there are pre-existing factors within Suffolk’s accommodation sectors which are already leading to existing pressures on ESC’s housing services. In Leiston, in particular, there are high levels of vulnerable people in housing need (see Accommodation Strategy APP-613), paragraphs 4.3.29; 4.3.30; 4.3.35 and 4.3.37).</p> <p>The provision of an accommodation campus and caravan site are efforts to mitigate the adverse impacts on tourist accommodation and the private rental sector. Even with them in place, the Applicant recognises that there will be residual impacts which it proposes to address through a Housing Fund, the principle of which is agreed between the Council and the Applicant.</p> <p>ESC agrees with the principle of delivering the accommodation campus and caravan site and the proposed scale of those facilities (i.e. a 2,400 bed campus and a 400-pitch caravan site). It is also agreed that the proposed locations adequately balance the needs of the project and the environmental and community effects (Initial Statement of Common Ground REP2-076), entries SE12 and SE14).</p> <p>ESC has outstanding concerns in relation to the timing of the accommodation campus and caravan site. These were raised in ESC’s comments on the draft DCO REP3-064 (at point 16) and remain outstanding. In</p> |
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particular, the Council suggested that the campus and caravan site should each be identified as separate works and that two new requirements should be included in the draft DCO, namely (1) that the accommodation campus must be complete by the time of peak construction. ESC suggested that this could be specified as either 2028 or by the time 7,000 individuals are engaged in construction activities. It now considers that a trigger of 7,000 construction workers would be most appropriate; and (2) that no part of the authorised development can commence until the caravan park is ready for use.

To put those requests in context, Chapter 9 of the ES [\[APP-195\]](#) treats the Accommodation Strategy as embedded mitigation (see, for example, paragraph 9.7.112 of the ES) which means that there is no assessment of the impact on accommodation absent that Strategy. The Accommodation Strategy assumes that by the time of peak construction, there will be 3,000 workers accommodated on the campus and at the caravan site (i.e., they will both be at full capacity) (see [\[APP-613\]](#), paragraph 2.3.5. The Strategy expects the caravan park to be available for use by the end of the first year of construction and the campus to be available for use within the first three years of construction. However, paragraph 5.3.5 of the Strategy only requires the Applicant to exercise 'reasonable endeavours' to deliver those facilities within those timescales.

ESC is content for the Applicant to use reasonable endeavours to deliver the campus within three years, but also seeks a 'longstop' provision, to be secured as a requirement on the DCO, that the accommodation campus must be completed and available for use by the time 7,000 construction workers are engaged. ESC considers this requirement to be both reasonable and necessary to mitigate the impacts on tourist accommodation and the private rental sector, particularly in circumstances where the Applicant's assessment assumes that the campus will be complete and fully occupied by the time of peak construction activity.

There is a separate and discrete issue in respect of the caravan site. Experience at Hinkley Point C revealed problems with the unauthorised siting of caravans associated primarily with the civils workers, who came early in the construction programme. That issue is recognised in the Applicant's Accommodation Strategy [\[APP-613\]](#) at paragraph 5.2.1. The Applicant recognises in the Strategy that it is desirable to provide early accommodation and prudent to seek proactively to meet demand. ESC agrees. Rather than a requirement

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| | <p>that the caravan site should be delivered prior to the commencement of construction, ESC is willing to consider the delivery of the caravan site within 6 months of the commencement of construction, but this may require an increase in the Housing Fund to reflect that delay.</p> <p>Influx of non-home-based workers and Emergency services impacts, and implications for community safety</p> <p>At peak construction, there will be some 7,900 workers, of whom 5,880 are anticipated to be non-home based. The workers will be overwhelmingly male and between the ages of 20 and 49 (Community Safety Management Plan [APP-635], paragraph 4.3.2). ESC consider the significant demographic change will give rise to community safety issues and cohesion issues, violence and Anti-Social Behaviour (ASB). A summary is given at Annex A in respect of the likely community safety and cohesion issues likely to be associated with the influx of the construction workforce. This Annex collates evidence relating to community safety issues and includes reference to the latest reports from Hinkley Point C which indicates that issues of crime and anti-social behaviour related to the non-home-based workers are beginning to arise.</p> <p>Given the lower than national average wages in the area and existing rates of unemployment and deprivation in the area, there is a risk that the large influx of non-home-based workers will act as a ‘honey pot’ for criminal activity. Furthermore, police records indicate that men between 20 and 49 have a higher propensity to criminal and anti-social behaviour, particularly when they are living away from home.</p> <p>At paragraph 9.7.192 of the ES [APP-195], the Applicant identifies a number of concerns raised by various stakeholders, including potential risks to vulnerable young people and care leavers, particularly those in housing need; risks related to cultural differences between non-home based workers and residents; risks associated with drugs, alcohol and prostitution and other aspects of anti-social behaviour (including county lines drug routes). At paragraph 9.7.14 of the ES [APP-195] the Applicant recognises that the Project has the potential to exacerbate those issues.</p> <p>It has long been recognised Leiston, Lowestoft, Saxmundham, Aldeburgh and Felixstowe, and to a lesser extent other market towns and rural areas of East Suffolk, have experienced multiple deprivation with</p> |
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| | <p>associated health, crime and ASB and risk-taking behaviours, compared to other more affluent areas of the county.</p> <p>Although Leiston is recognised as the community that will be most affected in East Suffolk by the construction of Sizewell C, in terms of community cohesion, community safety impacts and risks and equality impacts, Lowestoft, Saxmundham and Aldeburgh, and also the wider rural areas and towns including Woodbridge and Felixstowe that are also likely to be affected. The existing Community Safety Partnership and the Safer Stronger Communities Board led by ESC and SCC respectively, currently effectively tackle the existing community safety issues, impacts and risks across the district and wider Suffolk. These include county lines, gang related violence, Prevent radicalisation, domestic abuse, criminal and sexual exploitation, and drug and alcohol misuse.</p> <p>ESC considers that a multi-agency approach is required to promote community safety and social cohesion; tackle emerging issues in a timely manner and to promote prevention and awareness to safeguard local communities.</p> <p><u>Mitigation</u></p> <p><u>Resilience Fund</u></p> <p>The Applicant has proposed a public services resilience fund to address impacts on community cohesion and safety. This is secured through Schedule 5 of the Deed of Obligation and is welcomed by the Council.</p> <p>ESC considers that part of the Fund should be directed to the East Suffolk Safety Partnership which operates a programme or preventative and mitigation measures. This programme has been prepared in collaboration with Suffolk Constabulary. Measures include tried and tested projects and strands of activity including Crucial Crew, Crucial Crew plus, Prevent Wrap training, Suffolk Family Focus, Town pastor scheme, Pubwatch and Nightsafe scheme. Through the expanded CSP Action Plan of mitigating measures, the Council will achieve positive safeguarding outcomes for local communities and in particular vulnerable groups by raising awareness and providing the information, advice, and tools necessary to promote prevention, ensure</p> |
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communities understand the consequences of identified risk-taking behaviours and reduce the risk of becoming involved with or impacted by ASB and criminal activity. This will ensure the safety of local communities and also the safety of the NHB workers.

The CSP Action Plan includes a range of effective preventative, safeguarding and community safety measures, some of which are mirrored and working effectively at Hinkley Point C.

The Fund is the subject of ongoing discussions between the Council and the Applicant.

Workers' Code of Conduct

The Council seeks an additional requirement in the DCO which obliges the undertaker to produce a Workers' Code of Conduct to be signed by construction workers. The Applicant relies on the Code of Conduct as embedded mitigation in both the ES and Community Safety Management Plan [[APP-635](#)], at paragraph 6.2.46. Given the Applicant's reliance on that measure, ESC consider it reasonable and necessary to secure its delivery.

Monitoring

ESC seeks funding to monitor impacts on community safety and cohesion. Monitoring currently takes place at Hinkley Point C (see Applicant's comments on the LIR [[REP3-044](#)], Table reference 28.4; 28c and 28.13). ESC wishes to develop and produce its own monitoring mechanisms, funded by the Applicant, in order to identify issues as they arise and develop appropriate mitigation measures in response through the Resilience Fund.

However, it is essential that that the existing East Suffolk Community Safety Partnership programme of preventative and mitigating measures is significantly expanded and delivered across the district, funded by the Applicant, to ensure the necessary capacity for design, implementation and monitoring to address the increased impacts and risks that Sizewell C will generate.

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| | <p>Sports and recreation provision and assessment</p> <p>One of the measures which the Applicant proposes to mitigate adverse impacts on community cohesion is the delivery of sports facilities at Leiston Leisure Centre. These will comprise two MUGAs (multi-use games areas) and a 3G all-weather football pitch (LIR paragraph 28.16 [REP1-045]). This is secured through Schedule 10 of the Deed of Obligation and is welcomed by ESC.</p> <p>ESC agrees that the scale and location of off-site sports facilities in Leiston are appropriate (p.3, MDS10, SoCG [REP2-076]). There are some outstanding matters which are the subject of ongoing discussion with the Applicant, relating to the lighting, drainage and noise impacts of the proposed sports facilities.</p> <hr/> <p>Health effects of a 9-12 year construction period on the local community</p> <p>ESC’s concerns in relation to health effects during the construction period are linked to the noise and air quality impacts of the construction activity. These matters were not raised by ESC at this ISH as the ExA indicated they were not appropriate matters for the hearing. ESC considers that these are important matters, which could themselves give rise to adverse health impacts, and hopes that noise and air quality impacts can be explored at a future ISH.</p> <hr/> <p>Monitoring and mitigation measures</p> <p>Sports and Recreation</p> <p>Delivery of the sports facilities at Leiston is secured through Schedule 10 of the Deed of Obligation. The principle of delivery is agreed. There are ongoing discussions as to the details of the sports facilities and their potential environmental effects.</p> <p>Community Issues</p> <p>ESC welcomes to delivery of a Housing Fund and Resilience Fund to mitigate impacts on community safety and cohesion.</p> <p>The Council expects to be fully engaged with the Applicant, informed by Community liaison, monitoring</p> |
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| | <p>and reporting, to develop a comprehensive approach to mitigation by appropriately directing the relevant funds.</p> <p>Monitoring will inform and allow for the timely adjustment and delivery of the community safety measures that will ensure positive safeguarding outcomes to promote the safety of East Suffolk communities. ESC anticipates that the community liaison arrangements will be designed and implemented with Town and Parish Councils, and/or other appropriate agencies across towns and parishes, to facilitate community reporting of issues and concerns to the CSP community Liaison team.</p> <p>Mitigation measures will include increase in capacity for domestic abuse outreach services, safe accommodation, domestic abuse Sanctuary Scheme, additional training, staffing and awareness raising. The expansion of existing service provision and mitigating measures will need to be delivered through increased capacity funded by the Applicant. SCC, through the wider Safer Stronger Communities Board will deliver these countywide measures and programmes, supported by the East Suffolk CSP locally across East Suffolk communities.</p> <p>As an element of the CSP Action Plan and proposed expansion of the programme of works detailed above, it is proposed to commission local VCSE organisations to deliver some of the programme strands of activity. It is anticipated that most of these groups will already be or have been operational within the district recently and will be best placed to deliver required community support particularly to vulnerable communities.</p> |
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Annex A

Worker Code of Conduct

Vetting is used only by EDF Energy at Hinkley Point C (HPC) for building site safety licence and not community safety mitigation. It will not identify DBS (Disclosure and Barring Service) and potential community safety issue.

Police cannot ask an offender “who they work for”- as this falls under the common law Police disclosure notice – only high-risk issues can be disclosed due to data protection issues e.g., a drunk driver who apprehended and is intending to operate a crane on the Sizewell C site the following day would be reported to the Applicant.

Demographic

Non-Home-Based (NHB) workforce – no breakdown available or provided by EDF Energy re. ethnicity and gender regarding HPC.

East Suffolk has a very different demographic to Avon and Somerset – East Suffolk has an ageing population and is very rural.

Data from the 2011 Census shows that the construction workforce in the United Kingdom (UK) is overwhelmingly male (approx. 88%) and aged between 20 and 49 years old. Over 15% of the UK construction workers were non-UK residents and 6% were not proficient in English.

This will have a significant impact on East Suffolk Communities and represents a 47% population increase in population in Leiston alone.

Criminal activity and ASB (anti-social behaviour) are more prevalent with a male age group, with offences including violent, sexual crimes, hate crime, county lines, gang violence, theft and burglary, radicalisation, alcohol and drug misuse, and ASB relating to the growth of the night-time economy.

HPC issues coming forward through Avon and Somerset Police - reports of tensions, night-time economy related issues – fighting, violence with intent, local tensions with workforce – intimidating groups, speeding motorists, fly-parking (no car parks to be constructed in Suffolk for a period of time after the commencement of Sizewell C). Use of local brothels, abuse and modern-day slavery issues reported.

Issues are also being experienced in rural villages and towns – tensions due to significant numbers of NHB workers using otherwise quiet services and leisure facilities e.g., pubs.

Defined roles but working in partnership – Community Safety Partnership (CSP).

ESC and SCC – have roles in prevention and safeguarding.

Suffolk Police – role in enforcement and visible presence.

Monitoring and governance

Community Safety Working Group to have a greater role than the HPC group in order to be able to hold EDF Energy and all partners to account and this includes ensuring all embedded mitigating measures proposed are provided for by the Applicant.

Evidence relating to Community Safety Priorities in Suffolk

The East Suffolk Community Safety Partnership (ESCSP) action plan is informed by and complements the Suffolk Police and Crime Commissioners: Police and Crime Plan 2017-2021 and the priorities of the Suffolk Safer Stronger Communities Board which are:

- Urban Street Gangs & County Lines (USG&CL)
- Hate Crime
- Prevent
- Violence against Women & Girls, Men & Boys (VAWGMB)
- Community Resilience

Each Local Authority in the Partnership has a duty to take account of community safety in all its work and ensure that all policies, strategies, plans, and budgets are considered in terms of the potential contribution to the reduction of crime and disorder.

The annual work programme of the ESCSP is informed by Suffolk Constabulary intelligence of the threat, risk, ASB and criminal activity either currently experienced and identified across East Suffolk District, or as emerging issues based on the intelligence received from other regions e.g., County Lines and radicalisation.

County Lines – Recent years – these have been prevalent in surrounding Ipswich, Great Yarmouth and Norwich.

East Suffolk also experienced organised crime and the distribution of drugs, summary below:

Felixstowe - we have worked proactively with police who have identified premises that have been cuckooed to ensure the safety of tenants and disrupt the county line. Also, young people were being exploited by others linked to criminal activity in Ipswich.

Lowestoft - an emerging gang was disrupted during 2019. Individuals linked had previous convictions for drug dealing and violent offences.

Leiston - a ‘gang’ assuming the name the ‘untouchables’ was intimidating the local community. Gang members were involved in drug related activity and linked with serious violent offences in the local area. Some members served custodial sentences and other members were moved outside of Suffolk. Local communities wanted to take matters into their own hands to stop the behaviour.

Saxmundham – some drug related activity transferred from Leiston to Saxmundham with an increase in ‘gang’ behaviour, criminal damage, violence involving young people between the ages of 13 years and 17 years. A multi-agency approach (Community Safety Partnership led) was taken to identify and address the activity with a focus on education and support services to aid preventative action. Recent escalation in young people taking *spice* with vapes. Offences concentrated in Saxmundham and Leiston at this time, resulting in a number of young people requiring hospital treatment. Again, a multiagency problem-solving approach is being actioned to support schools, parents, youth workers and education for primary school children.

Current risk activity - The A12 running through the district and rail networks provides an opportunity for criminals to travel easily from London and other export areas into quieter counties (Suffolk, Norfolk and Essex) and within coastal towns to provide accessible markets. Cars have been stopped en-route through the district containing individuals from outside of Suffolk, subsequently found to be linked to drug dealing and with drugs in the vehicle.

We are also aware of Suffolk young people travelling to and from different areas in the county as a result of their links with drug dealing (west Suffolk to Ipswich, Ipswich to Felixstowe, Ipswich to Lowestoft etc.) and being criminally exploited by older more sophisticated individuals.

ASB Reports

| RK - HCSG QUARTERLY KPI FIGURES | | | | | | | | | | | | | | | | | |
|--|-------------|-----------|-----------|-----------|--------------|--|-------------|-----------|-----------|-----------|--------------|--|-------------|-----------|-----------|-----------|--------------|
| 2017 – PRESENT East Suffolk | | | | | | | | | | | | | | | | | |
| | 2018 | | | | | | 2019 | | | | | | 2020 | | | | |
| | Q1 | Q2 | Q3 | Q4 | Total | | Q1 | Q2 | Q3 | Q4 | Total | | Q1 | Q2 | Q3 | Q4 | Total |
| ASB REPORTS | | | | | | | | | | | | | | | | | |
| ASB - NOISE | 15 | 22 | 24 | 29 | 90 | | 27 | 31 | 33 | 36 | 127 | | 39 | 52 | 21 | 26 | 138 |
| ASB - LITTERING | 17 | 24 | 21 | 25 | 87 | | 18 | 22 | 20 | 25 | 85 | | 27 | 13 | 19 | 23 | 82 |

| | | | | | | | | | | | | | | | | | |
|-----------------------|-----------|------------|------------|------------|------------|--|------------|------------|------------|------------|------------|--|------------|------------|-----------|-----------|------------|
| ASB - FLY PARKING | 33 | 40 | 44 | 48 | 165 | | 42 | 50 | 52 | 38 | 182 | | 33 | 48 | 29 | 4 | 114 |
| ASB COMMUNITY TENSION | 4 | 6 | 10 | 14 | 34 | | 10 | 13 | 14 | 16 | 53 | | 10 | 18 | 10 | 7 | 45 |
| ASB - HMOs | 4 | 8 | 7 | 12 | 31 | | 10 | 9 | 8 | 10 | 37 | | 8 | 20 | 18 | 16 | 62 |
| TOTALS | 73 | 100 | 106 | 128 | 407 | | 107 | 125 | 127 | 125 | 484 | | 117 | 151 | 97 | 76 | 441 |

Hate Crime

- There were 227 hate crimes recorded across Suffolk during the period October to December 2020, 91 less crimes than the previous quarter and 23 more than the same period last year (Oct Dec 2019).
- 20% of offences were committed across East Suffolk (82% in Lowestoft).
- Males made up 68% of crime suspects.
- 67% of offences were either racial or religious and crime or incident based.

As the above community safety baseline risks, impacts and issues demonstrate, the geographical, demographic and socio-economic make-up of East Suffolk compared to Avon and Somerset is very different.

The Ask

We are in discussions with the Applicant on the scope and magnitude of the East Suffolk Community Safety element of the Public Resilience Fund deed of obligation, the aim is for these negotiations to be complete in order to be reported into the Examination at Deadline 7.

The ESCSP enhanced and uplifted programme of measures and strands of activity detailed within the Action Plan [[REP1-059](#)] is informed through the established, tried, and tested suite of measures, projects and programmes delivered over recent years by the ESCSP. Furthermore, the expanded Action Plan is based on the socio-economic and demographic contexts of Sizewell C and the East Suffolk and wider Suffolk communities.

Monitoring

ESC and partners will require our own monitoring and community reporting mechanisms.

