

The Sizewell C Project, Ref. EN010012

**Issue Specific Hearing 4 (9 July 2021) – (ISH4)
Socio-economic and Community Issues**

**Post Hearing Submissions including written
summary of Suffolk County Council's Oral Case**

Suffolk County Council Registration ID Number: 20026012

Deadline 5

23 July 2021

Issue Specific Hearing 4 (9 July 2021) - (ISH4) Socio-economic and Community Issues
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Examining Authority's Agenda Item / Question	Suffolk County Council's Response	References
	<p>These Post Hearing Submissions include a written summary of the Oral Case presented by Suffolk County Council (SCC). They also include SCC's submissions on all relevant Agenda Items, not all of which were rehearsed orally at the ISH due to the need to keep oral presentations succinct. The structure of the Submissions follows the order of the Agenda Items but within each Agenda Item, the Submissions begin by identifying the main points of concern to SCC and then turn to more detailed matters.</p>	
Agenda Item 1 – Welcome, introductions and arrangements for these Issue Specific Hearings		
Item not on the Agenda – Query about the Implementation Plan		
<p>Delivery of the Accommodation campus</p>	<p>SCC notes the discussions between the Examining Authority and the Applicant whether the updated Implementation Plan [REP2-044] means that the accommodation campus is delivered later – in year 3 rather than year 2 – than envisaged in the original Implementation Plan [APP-599]. SCC notes that the Applicant stated (via Mr Hunt) that there was no change to the timing of the delivery of the accommodation campus as assessed in the ES. SCC has not been able to confirm this from review of the submitted documentation. We look forward to written clarifications from the Applicant on this matter, and will comment further at that point.</p>	
Agenda Item 2 - Impacts on and opportunities for:		

<p>The local economy, including local businesses and the local supply chain</p>	<p>East Suffolk Council (ESC) as the local district authority has taken the lead on the business and supply chain topic area, and in general, SCC supports ESC's position.</p> <p>SCC would emphasise that the expected benefits derived from any new build are welcome but can only be seen as opportunities rather than confirmed benefits. SCC expects to see economic opportunities for the local area maximised, and the Applicant's ambitions further increased. Alongside mitigating negative impacts we expect the applicant to maximise positive economic benefit.</p> <p>Capitalising on these positive economic benefits will involve more than a conversation between the Applicant, East Suffolk and Suffolk County Councils but will need to broaden out to include the LEP and other partners. Points made by Mr Munson of New Anglia LEP at the ISH 4. We seek a firm commitment from the Applicant to do this.</p> <p>In addition to those areas of opportunity raised by ESC we would also wish to work with the applicant on,</p> <ul style="list-style-type: none"> • recognition of the role of any new build as part of Suffolk's wider Energy Cluster with its existing offshore and onshore renewables opportunity. SZC Co. Ltd being an essential cog in the activity of the region, accelerating inward investment of Tier 1 and Tier 2 suppliers who may be working in multiple energy construction projects locally. • Developing R&D/Innovation opportunities such as that already being manifested in the applicant's work on hydrogen and the linkages to Freeport East. • Supporting the outcomes set out in the Nuclear Sector Deal the government's Energy White Paper, the Ten Point Plan for a Green Industrial Revolution and Build 	<p>Joint Local Impact Report [REP1-045]</p> <p>ExQ1 – SCC responses [REP2-192]– SE1.5, P505</p>
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	Back Better in delivering clean growth and achieving a net zero economy.	
Local businesses	<p>East Suffolk Council (ESC) as the local district authority has taken the lead on the local business topic area, and in general, SCC supports ESC's position.</p> <p>There are significant opportunities for local businesses such as small retail, pubs, restaurants, cafes takeaways to benefit from worker spend and we would encourage the Applicant to work with local partners to develop local spend schemes etc for the workforce to capitalise on this.</p>	<p>Local Impact Report [REP1-045] Table 25, 25b, P345</p>
Supply chain	<p>East Suffolk Council (ESC) as the local district authority has taken the lead on the supply chain topic area, and in general, SCC supports ESC's position.</p> <p>The Applicant's activities are, at the moment, focused on adding local businesses into the supply chain for the build. While this is supported, SCC sees this as too-narrow a focus and as such a missed opportunity for the local economy:</p> <p>In addition to mitigation measures we are keen to maximise opportunities for local businesses and encourage the Applicant to work with partners (particularly New Anglia LEP) to make this happen by developing an effective business growth and investor development service.</p> <p>We do not have sufficient detail in the supply chain strategy to judge whether the commitment in the S106 would actually deliver the benefits and mitigation we are seeking. In response to an oral question from the ExA SCC indicated</p>	<p>ExQ1 – SCC responses [REP2-192]– SE1.27, P513</p>

	<p>that it was looking for the provision of a draft supply chain strategy during the Examination.</p> <p>The SZC Supply Chain Work Plan appended to Document 8.17 “Draft Deed of Obligation – Clean Version” (PINS Ref: EN010012) provides some detail but makes clear that the document is “neither rigid nor comprehensive”. It also states that activity beyond the end of Quarter 4 2021 “could” include a range of activities but there is no firm commitment to any of these actually taking place. Nor do the key outputs for the work plan make any mention of working with and sharing information with local authority or other partners.</p> <p>We believe that an appropriate supply chain strategy should encompass more than just a requirement to meet S106 obligations, as S106 obligations focus on mitigating negative impacts. An appropriate supply chain strategy should seek to capture the wider benefits and opportunities from the development and should therefore go beyond the S106 agreement.</p> <p>We wish to explore with SZC Co. Ltd, the SZC Consortium and the Works Alliances how we can use the opportunities presented by Sizewell C to add further value to these activities and at the same time support the new nuclear build. The most important principle is that our programme of works complements not competes with the work already underway through other developer programmes. For example, we acknowledge and support the supply chain work being led by Suffolk Chamber of Commerce, but it does not currently deliver a programme delivered by Nuclear Advanced Manufacturing Research Centre or the Offshore Renewable Catapult that could enhance the work and, over the medium to long term provide opportunities for companies to move on from the Sizewell C supply chain to access the other energy sectors that we support.</p>	
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<p>Employment impacts during construction, and operation, including employment churn</p>	<p>As set out within the LIR at chapter 25 [REP1-045] SCC expects the project to provide positive catalytic opportunities.</p> <p>SCC expects the applicant to clearly set minimum commitment levels for home-based employment numbers and to work with SCC to ensure robust strategies, plans and actions are in place, timely, to maximise the potential of these opportunities. SCC made the point that if those numbers were not achieved, there would be impacts on the adequacy of the assessment of socio-economic effects in the ES.</p> <p>As set out in paragraph 25.14 of the LIR [REP1-045] and paragraph 108 of the RR [RR-1174] SCC has a significant concern that labour market churn is still not being adequately assessed or recognised by the applicant as a risk to inform commitment levels and measures. This concern is twofold:</p> <ul style="list-style-type: none"> • the pull of skilled labour from current local employment to work on the project leading to a damaging reduction in economic activity • Deliverability of essential public services such as adult social care services and community health care provision <p>SCC believes that labour market churn may be further exacerbated by the cumulative impact as set out in paragraph 25.15 of our LIR [REP1-045] and covered in question SE.1.0 in response to the Examining Authority's First Written Questions [REP2-192] and also in our Relevant Representation paragraphs 156 – 160 [RR-1174]. We note the recent work done by the Applicant [REP2-112] in response to the ExA's First written questions which has</p>	<p>Local Impact Report [REP1-045]</p> <p>Suffolk County Council Relevant Representation [RR-1174]</p> <p>Response to the Examining Authority's First Written Questions' [REP2-192]</p> <p>Appendix 23B [Rep 2-112]</p>

	<p>provided further clarity to the cumulative assessment for socio economics.</p> <p>SCC have adopted a 'legacy' approach, legacy simply being defined as a skill/competency needed now in Suffolk and by the SZC project and needed once the construction is complete therefore having an enduring and growing application in Suffolk's economy, to the positive skills impact. Using labour market information to understand what these skillsets are we are then seeking to work with the applicant and their contractors to promote these opportunities to local residents. By adopting this approach, we seek to mitigate the cliff edge of unemployment which could occur as elements of the project demobilise.</p> <p>The skills and education initiatives as set out in paragraph 25.15 of our LIR [REP1-045] aim to maximise the positive catalytic impact of hosting the SZC project and to ensure that, as set out in Paragraph 25.16 of the LIR [REP1-045], all Home Based numbers used within the ES are met. These numbers must be viewed as a minimum requirement for the project as mitigation to all other themes is based on a worst-case scenario of non-home based workers. If the quoted numbers of home-based workers are not reached then the mitigation cases developed and agreed would not be true and would require further mitigation.</p> <p>Impacts of churn on cost of delivery of statutory services (Cross-related to Agenda Item 3 below)</p> <p>SCC considers that there is a risk of negative impact of churn on the deliverability of statutory services as a result of the workforce requirements of the project and associated economic development – including Adult Social Care Services (Home, Community, Residential, Supported Living), community health, childrens social care services and ancillary school staff.</p>	
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	<p>As set out elsewhere, the Sizewell C project will provide many positive, sustainable, employment opportunities which is welcomed. However, this increased demand may lead to an artificial inflation of wages. As a consequence, SCC's ability to recruit to, and retain individuals within roles supporting the delivery of statutory services will be reduced as people who would normally enter into and progress within these roles are diverted into the project's workforce.</p> <p>This may lead to an unsustainable reduction in the local health, social work and care work force and a consequential negative effect on the level of care and support available to those using services in the local area and wider region (would have to deploy resources from other areas), and – worse case - leave people in the local area without care (private care sector) or more demand on the local authority to provide expensive care resources required to cover care in emergency circumstances.</p> <p>In summary, the costs of delivery of care are likely to rise. This means that the population could face reduced levels of care provision in the area, or alternatively face Council tax increases, unless the Applicant provides suitable mitigation.</p> <p>We expect the Applicant to take this into account when considering the impact, risk and required mitigation. SCC considers that the Public Services Contingency Fund can contribute to mitigating these effects, and continues discussions with the Applicant about the scope and scale of this fund. This is further discussed under ISH4 Agenda Item 3 below. Similarly, we are seeking the Applicant's commitment to the agreed broad scope and mechanisms of all key measures within the ESE Strategy as many of these measures will support the creation of wider talent pools to minimise the risk of wage inflation and churn leading to negative displacement.</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>In order to mitigate impacts, ensure minimum Home Based worker numbers are met and to maximise opportunities SCC has worked with the applicant to define a number of measures. A full list of these requirements and obligations is set out in paragraph 25.25 of the Councils LIR [REP1-045].</p> <p>As set out in our response to the Examining Authority's First Written Questions - question SE. 1.31. [REP2-192] the broad scope and mechanism of all key measures of the ESE Strategy have been agreed in principle between the local authorities and the Applicant. However, we remain unable to fully support the package until we have agreed details around governance, monitoring and levels of commitment.</p> <p>We are yet to reach full agreement with the applicant over the following items in paragraph 25.25 [REP1-045].</p> <p>Education activities and curriculum support – SCC expects the applicant to make a commitment to funding activities and providing resources, this to be obligated through the Deed of Obligation although the work is clearly collaborative</p> <p>A Skills for Supply Chain programme – the applicant has indicated that activity being compelled through the Supply Chain Strategy [APP-611] is sufficient. As highlighted in our RR at paragraphs 106 and 107 [RR-174] and in our answer to the Examining Authority's First Written Questions' SE. 1.27. [REP2-192] the current Supply Chain Strategy does not contain any detail on how or what will be delivered, this is then further confused by the Draft Deed of Obligation [REP3-025] submitted by the applicant at D3. The applicant has included the Annex SZC Supply Chain Work Plan, where at paragraph 7(h) Skills is discussed as an area not</p>	<p>Local Impact Report [REP1-045]</p> <p>Response to the Examining Authority's First Written Questions' [REP2-192]</p> <p>LIR Appendix 2:1 [Rep1-089]</p> <p>Deadline 2 Submission - 8.17 Draft Deed of Obligation (formally Section 106 Agreement) - Clean Version - Revision 4.0 [REP2-060]</p>

	<p>being led by the Supply Chain Strategy but can be supported through running events.</p> <p>SCC has set out in our LIR, paragraph 24.24 (ii) [REP1-045] its expectations of the applicant with regard to what we expect the Supply Chain strategy to deliver and have been in further conversation with the applicant around this detail.</p> <p>Monitoring – this is covered in detail under the monitoring and measurement item in these notes. SCC is seeking independent monitoring or appropriate data sharing agreements to be put in place to enable access to pertinent data. Learning from experience at Hinkley Pont C, highlighted in the Oxford Brookes study commissioned by the New Nuclear Authorities Group (LIR Appendix 2:1 [REP1-089]), access to relevant data and timely reporting has been an issue that has hampered impact mitigation and accurate reporting.</p>	
Tourism impacts prior to and during construction, and post construction, the methodology of assessment and suitability of the Tourism fund	East Suffolk Council (ESC) as the local district authority has taken the lead on the tourism topic area, and in general, SCC supports ESC's position.	
Effect on rail services and capacity for infrastructure improvements during the construction period	We note from ExQ1 responses (NV1.90) that Network Rail considers that any late running trains could have a knock-on effect to the morning passenger train services, but suggest that mitigation may be possible. The Applicant does not anticipate an effect on passenger services by the additional freight services, and we would defer to Network Rail to respond on this matter.	ExQ1 responses and comments [REP3-046]
Monitoring and mitigation measures	Supply Chain	LIR Appendix 2:1 [Rep1-089]

	<p>East Suffolk Council (ESC) as the local district authority has taken the lead on the supply chain topic area, and in general, SCC supports ESC's position.</p> <p>Monitoring and reporting as set out in the Supply Chain Strategy [APP-611] is merely an exercise in recording and reporting UK content. There is nothing specific set out that would be useful to SCC and its partners to either act as a measure of actual impact of the negative and positive impacts discussed. SCC is seeking independent monitoring or appropriate data sharing agreements to be put in place to enable access to this pertinent data. We expect:</p> <ul style="list-style-type: none">• Total value of contracts awarded to businesses based in – broken into Districts/Borough level for Suffolk – East of England broken into County levels – all of this data set against value of contracts awarded to non-unique suppliers who received a contract for HPC• Value of contracts awarded to businesses based in East of England by work package / sector – broken into Districts/Borough level for Suffolk – East of England broken into County levels• Total number and sector of businesses registered on the Supply Chain Portal - – broken into Districts/Borough level for Suffolk – East of England broken into County levels• Total number of businesses registered on portal with a profile checked for completeness in either of the following categories:<ul style="list-style-type: none">• Ready• Almost Ready• Not Ready	
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	<p>With the number that have transitioned from Not Ready to Almost Ready or Ready with Suffolk Chamber assistance</p> <ul style="list-style-type: none"> • Number of [PQQs / Contracts applied for] by businesses based in East of England – broken into Districts/Borough level for Suffolk – East of England broken into County levels – if businesses were not successful reasons to be shared • Suffolk Office, Warehouse and yard space take up (m2) • Number of local businesses created or growth supported as a direct or indirect result of the construction of SZC <p>Employment, Skills and Education</p> <p>Accurate measurement of the construction workforce is key to ensuring that we can:</p> <ul style="list-style-type: none"> • Support the reviewing, evaluation and inform the Annual workforce delivery implementation plans. • Measure the impact of implemented measures and interventions • Have credible, consistent and robust knowledge of the workforce make up and structure with which to ensure the applicant is delivering on key commitments such as: <ul style="list-style-type: none"> ○ Diversity and equality measures ○ Home based workforce vs Non home based workers 	
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	<ul style="list-style-type: none">○ Origin of home based workers (unemployed etc) <p>SCC is seeking independent monitoring or appropriate data sharing agreements to be put in place to enable access to this pertinent data. Learning from experience at Hinkley Pont C, highlighted in the Oxford Brookes study commissioned by the New Nuclear Authorities Group (LIR Appendix 2:1 [REP1-089]), access to relevant data and timely reporting has been an issue that has hampered impact mitigation and accurate reporting.</p> <p>We expect:</p> <ul style="list-style-type: none">• Actual workforce numbers• Workforce forecasting – roles and levels (outside of the Workforce Development Strategies) that has taken into account actuals• Proportion of Suffolk (broken into District/Borough level) and Home Based (County level) workers employed• Apprenticeship numbers and proportion of Suffolk and Home Based within the total• Suffolk and Home Based workers within the construction workforce who were previously unemployed• Suffolk residents placed into work via the SZC Jobs Service	
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	<ul style="list-style-type: none"> • People serving apprenticeships and/or in training (as per earn and learn definition) as a proportion of the construction workforce (desired 5%) • Numbers of vulnerable or disadvantaged people in employment as a proportion of the construction workforce • Impact measurements and KPI's associated with all agreed measures • Numbers of people supported by the SZC Jobs Service into further employment following demobilisation • Use of analytical tools such as EMSI to measure labour market churn against agreed pre project baselines. 	
Agenda Item 3 - In respect of community issues to include:		
Demographic modelling (including gravity model) and implications of minor changes in forecasting	<p>SCC considers the Applicant's demographic modelling, including the gravity model, as an acceptable approach to forecasting. As with any model, there are inherent limitations to the accuracy of the predictions, which will need to be treated as indicative, but with inherent risk.</p> <p>As Mr Bedford stated at the ISH, further sensitivity testing of the demographic modelling is desirable (as was requested (ref 4.4/4.5 of the Aecom review of demographic modelling [REP1-098], stating that "Sensitivity testing has not been undertaken to inform the accommodation strategy should there be any changes in these assumptions").</p> <p>Due to the indicative nature of the modelling, SCC considers that robust monitoring and appropriate contingency measures are essential to deal with any deviations from the predictions. The potential for different</p>	Appendix 2:10 LIR[REP1-098]

	demographics and for a more or less condensed distribution of the workforce will have implications on socio-economic and community impacts, as well as on the transport network.	
Housing and accommodation strategy, including location, size and timing of provision of the accommodation campus and caravan site at the LEEIE,	<p>East Suffolk Council (ESC) as housing authority has the primary responsibilities and expertise in this topic area, and in general, SCC supports ESC's position with regard to the housing accommodation strategy (separate comments are made below on the timing of the provision of the accommodation campus).</p> <p>SCC's particular concern in this respect is the impact of additional demand from the non-home-based workforce for local accommodation on vulnerable people and public services, as in:</p> <ul style="list-style-type: none"> • Potential effects on vulnerable young people and care leavers, some of whom are in housing need or vulnerable to homelessness; • Potential increase in rents in the Private Rented Sector and impact on families and vulnerable households, potentially resulting in financial difficulty and homelessness; and • Potential effects on housing for key workers as a result of increase in rents, which may impact on availability of key workers in the local area. <p>SCC notes that the housing and accommodation strategy has also direct implications on transport impacts, especially as regards to the relationship between the assumptions about modal shares and the provision of the accommodation campus.</p>	<p>LIR paragraph 29.43 [REP1-045]</p> <p>Draft Statement of Common Ground [REP3-031]</p>

	<p>Timing of provision of the accommodation campus and caravan site</p> <p>SCC accepts the need, scale and parameters for the Accommodation Campus and Caravan Site as proposed by the Applicant. SCC accepts that there are no obvious better locations for the Accommodation Campus or Caravan Site that would fulfill the Applicant's needs and be acceptable to local communities.</p> <p>SCC notes the discussion at ISH between the Examining Authority, East Suffolk Council and the Applicant whether a control should be introduced for the timing of the delivery of the accommodation site.</p> <p>The principle of a control is supported by SCC, which should secure that the campus becomes available well in advance of peak workforce figures. SCC supports ESC's view that provisions should be made for the caravan site to be provided either before, or potentially within 6 months of, construction commencing.</p> <p>As stated in SCC's ISH1 submission at Deadline 5, SCC notes that the Applicant agreed that it would produce a document at D5 which will address a number of the questions raised by the ExA in relation to securing mitigation, and SCC expects the document will provide a very clear explanation as to the way in which the sequencing set out in the Implementation Plan [REP2-044] will be secured. The LIR [REP1-045] para 31.27 suggested in this regard that: "A means of controlling this impact would be to include a limit to the number of people that can be employed on the site until each of the accommodation facilities is completed unless further effective mitigation measures can be put into place." Such a control should in</p>	<p>LIR [REP1-045] para 31.27</p>
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	<p>SCC's view be aligned to other transport related controls, and could be rolled into the early years controls.</p> <p>Impacts on Adult and Childrens Services Mr Gavin Bultitude, SCC Assistant Direct in Adult and Community Services, explained that the Sizewell C workforce may, from a social care service delivery perspective, lead to a reduction of residential type care provision. In addition, the housing demand arising from Sizewell C may create inflated purchase/ development costs in the area which will reduce the sector's ability to develop and provide suitable provision in the area for local residents. Given the anticipated increase in demand for housing during the development period, there is a risk that vulnerable/disadvantaged people and key workers (including care staff) will be unable to access sufficient social housing in the area as they have to compete against rented housing demand arising from the Sizewell C workforce.</p> <p>These matters are explained in some more detail in SCC' Deadline 5 response to additional documents submitted at Deadline 3, in our response to comments from the Applicant on the LIR Chapter 29 – Housing and Accommodation.</p> <p>SCC understands that some of these effects would not be mitigated through the Housing Fund, and expects that those would be covered by the Public Services Resilience Fund. Discussion with the Applicant are ongoing on this matter.</p> <p>The Applicant responded on these matter by stating that at Hinkley Point C, there was no evidence of impact of the workforce on homelessness, and that the housing market size and tenure around Hinkley Point C and Sizewell C very</p>	
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	<p>similar. SCC wishes to note that, even if there are some similarities, the geography around Sizewell is very different, including that there is no town of the size of Bridgwater nearby. Impacts as set out above may also not directly result in homelessness, but in further disadvantages to vulnerable people.</p> <p>The Applicant also stated that in their view, a care home closing as a result of the demand of the Sizewell C workforce was unlikely. SCC notes that the likelihood of this impact occurring might be relatively small, but the level of impact would high, as this would significantly effect the quality of life of individuals and families as relocation to a different part of the County may be the only option, and it may come at a significant cost to SCC.</p>	
Influx of non home based workers	<p>Overview</p> <p>SCC expects as a result of the influx of the large number of non-home based workers impacts on:</p> <ul style="list-style-type: none"> • Housing (see above) • Community safety and community cohesion; • Increase in demand for public services as a result of the increased population, in adult and childrens services, including potential safeguarding impacts; • Impacts on health services (discussed in later topic area); • Impacts on school and early years provision. <p>In general, SCC agrees that the principle of the Public Services Resilience Fund proposed by the Applicant can mitigate for the majority of these impacts, and discussions continue on the scale and detail of this fund.</p>	

	<p>Impacts on health services</p> <p>Our health is shaped by a range of factors. It is hard to be precise about how much each of these factors contributes to our health, but the evidence is convincing that the wider determinants of health have the most impact, followed by our lifestyles and health behaviours, and then the health and care system. There is also now greater recognition of the importance of the communities we live and work in, and the social networks we belong to. In our response to the Sizewell application we, as an integrated system, recognise the interfaces and overlaps between these issues. Our particular concerns are that the impacts of the construction and the incoming workforce:</p> <ul style="list-style-type: none">• Do not exacerbate existing inequalities in our areas of deprivation and among our vulnerable groups – for example Suffolk’s increasing ageing population with subsequent increasing vulnerabilities and complexities, young people and vulnerable adults at risk of exploitation• Do not put additional stress on our Suffolk workforce and services• Do not adversely impact on the ability of our communities to be a source of benefit to health and wellbeing <p>There is an imperative therefore to ensure that we have robust plans in place to:</p> <ul style="list-style-type: none">• Deliver proactive mitigation so that members of our population are not put at risk• Identify where timely, reactive mitigation is required through diligent monitoring of impact	
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	<p>SCC welcomes the proposed comprehensive on-site health provision for the Sizewell workforce, and seeks specific elements of the service, including e.g. onsite sexual health services, mental health services and drugs and alcohol abuse services as well as promotion campaigns, to be specifically secured by obligation. However we consider that there will still be impacts on the wider health system and on public health provision that need to be mitigated.</p> <p>As was set out at ISH4, and referred to in Chapter 27 of the LIR on Public Services, SCC anticipates the following negative impacts in relation to Public Health:</p> <ul style="list-style-type: none">• Increase in demand for under 5s and family services, particularly Health Visitor Services, as a result of increase in children arising from incoming workforce.• Impact of sexual activity on workforce & resident population will impact on Suffolk sexual health service. Onsite occupational health provision will not be able to provide level 3 services, and additional activity for these services could result in significant cost and facilities in pressure on local sexual health services. SCC expects proportional contributions to these services from the Applicant. SCC also expects workforce sexual health services to be included in onsite occupational health care provision and to be commissioned through SCC Suffolk Public Health.• Mental health prevention measures particularly suicide prevention: SCC expects that SZC Co. will provide mental health services directly for the Sizewell workforce, both in preventative capacity and as they arise, as part of the package of services offered to its workforce. SCC notes that the demographic profile of the Sizewell C workforce could be particularly at risk of suicide (as men are at three times greater risk of suicide	
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	<p>than women; men aged 45-59 have the highest suicide rates; and suicide was the single biggest killer of men aged under 50). There is an opportunity to join up Suffolk suicide prevention work with Sizewell plans to support workforce mental health.</p> <ul style="list-style-type: none"> • Whilst it is welcome that the Applicant has recognised the potential impact of drug and alcohol misuse in its workforce and will carry out testing, there may still be additional demand on treatment services, for workers and their families with potential increased demand in the surrounding community. SCC expects that SZC Co. will provide drug and alcohol abuse services directly for the Sizewell workforce. <p>We note that the ExA requested at ISH4 for the CCG to provide an update on the proposed governance for the Health Working Group at Deadline 5. We confirm that SCC has been involved in the development of these Terms of Reference, and is supportive of the proposals put forward by the CCG.</p> <p>Community Safety</p> <p>As Mrs Geeson, SCC's Assistant Director Communities, set out at ISH4, SCC's main concern related to Community Safety is the substantial demographic changes from the Sizewell C non-home-based construction workforce (largely young males aged 20-49 years, and relatively well paid in comparison to local salaries). There is a significant risk that this new population will result in an increase of a number of crime types that involve vulnerable people, including criminal exploitation, gangs, county lines, domestic abuse, sexual violence, and hate crime.</p> <p>An increase in population of ANY kind will mean an increased impact on community safety and wellbeing,</p>	
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	<p>mental wellbeing, safeguarding and risk for vulnerable people.</p> <p>Sexual violence and domestic abuse are gender biased towards males being the perpetrators (there are some 2.3 million victims of domestic abuse a year aged 16 to 74, and two-thirds of them are women - UK Home Office statistics). Furthermore, the demographics of the incoming non-home-based workers are not only in the category most likely to commit crimes, but also most likely to be victims of crime (According to ONS (2017) younger adults were mostly likely to be victims of crime, and men were more likely to have been a victim of violence, robbery and vehicle-related theft, than women.).</p> <p>SCC has put forward in [REP1-059] a proposed action plan with a range of mitigations to put in place for these risks which would be just as much to protect the incoming workforce and their families as it would be to protect the existing communities in the area.</p> <p>The Applicant acknowledges that there is a potential risk related to drugs, alcohol and prostitution including exploitation of young girls by a predominantly male workforce, and potential for related increase in trafficking (6.3 Vol 2 Chapter 9, paragraph 9.7.192 [APP-195]). However, they state that "...these are potential risks rather than identified likely significant adverse effects and that mitigation is being provided on a discretionary, precautionary basis." ([REP3-044] 9.29 Comments on Councils' Local Impact Report, Table 28.1).</p> <p>Many areas of work of community safety are seen as 'hidden harm', meaning they are often not reported due to fear of reprisal, shame and sometimes people do not recognise they are a victim of a crime. This results in these crimes being vastly under reported, and the scale of which</p>	
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	<p>is often inaccurate and difficult to model. However, SCC stressed that the risks are very real.</p> <p>At the Issue Specific Hearing 4 the Applicant (Mr Hunt) suggested that “human behaviour could not be predicted” and that we were vilifying the Sizewell C workforce by suggesting there will be an increase in crime in the area. SCC does not make any assumption that the construction workforce are anything other than ordinary people, but we stresses that it is ordinary people that are involved in safeguarding and community safety issues – and, as set out elsewhere, the demographics of the workforce may suggest a higher propensity towards issues than the average demographic. SCC notes that 1 in 4 women experience domestic abuse at some point in their lives, and 1 in 6 men. With the influx of 5,900 people plus around 13% of those bringing their families ([APP-156] 5.13 Community Impact Report, para 2.6.29) to Suffolk for the construction of Sizewell C, there is a significant likelihood of domestic abuse affecting this cohort (both as victims and perpetrators). SCC would like to highlight that domestic abuse does not only occur in ‘long term’ family relationships, but can be any incident of controlling, coercive or threatening behaviour, violence, or abuse, between those aged 16 + who are or have been intimate partners or family members, regardless of their gender or sexual orientation (Crown prosecution service definition). This is therefore a significant risk in relation to the Sizewell C workforce.</p> <p>Domestic abuse and sexual violence are abhorrent crimes which result in lasting devastation and trauma for victims and their children. Whilst it is important that we work to prevent such crimes from happening, it is essential that specialist support services are in place to mitigate the damage caused. Following the commencement of the</p>	
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	<p>Sizewell C project, SCC would need to increase the capacity for our commissioned domestic abuse services (outreach service, safe accommodation, home security measures, perpetrator scheme) to ensure adequate support is available. With children and young people being a particular risk group, SCC also would need to increase capacity in family support, social work and youth justice practitioners.</p> <p>We understand that it is not the Applicant's role to address existing community safety issues, and SCC is not looking to the Applicant to resolve pre-existing problems in the community. However, this construction project will exacerbate community safety issues over and above what is currently experienced, and therefore SCC considers that the Applicant needs to provide resources to SCC to mitigate the issues by preventative and reactive work.</p> <p>We are working through the issues with the Applicant and we consider that the Public Services Resilience Fund may be an appropriate mechanism to fund the additional work required (as detailed in our Action Plan) to mitigate the impact, but the scale of this is still to be negotiated with the Applicant.</p> <p>We note at the Issue Specific Hearing 4 during the Socio-Economics agenda items, the Applicant stated that housing for the incoming workforce will be within a "45-minute radius" of the Sizewell site (contrary to the Applicant's Accommodation Strategy which states non-home-based workers will live within a "60-minute commute from the main development site" (8.10 Accommodation Strategy, paragraph 1.1.3)). This would include the major towns of Ipswich and Lowestoft, where there is evidenced County Lines activity. As noted in SCC's Deadline 5 "Comments on any additional information/submissions received at D3", in response to the Applicant's comments on the LIR chapter</p>	
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	<p>9.29, we fully expect the workforce to travel outside of the area that they are living for their leisure time, and gravitate to more urban areas to access the night time economy. It is here where the risk of community safety crime types will increase, including domestic abuse, sexual violence, hate crime and drug use (supply and demand).</p> <p>There are several County Lines currently operating in Suffolk. County lines is a criminal “business model” based on moving into areas to sell drugs to maximise profits. It works on a simple supply and demand model, and therefore a workforce population increase is likely to increase the demand for drugs (both class A and recreational use) which has the propensity to increase violence and harm to both individuals and communities.</p> <p>At the Issue Specific Hearing 4, the Applicant stated that they have a “robust security culture” and will have in place security vetting as well as a Worker Code of Conduct. We welcome this, but do not believe this will wholly mitigate against the significant community safety impacts that come with such an increase in population. For example, a propensity for domestic abuse or drug addiction will not be picked up in any vetting process, and these crimes by their nature often occur behind closed doors, so will remain hidden. Furthermore, when individuals are picked up for crimes, there is no obligation to disclose your employer, and so there will be an additional underreporting of crimes attributed to the workforce. This will be exacerbated by further subcontracting arrangements, where vetting is not a requirement.</p> <p>SCC welcomes the opportunity to be involved in the Community Safety Working Group, but note that further discussions are required with the Applicant around the proposed governance arrangements of the group.</p>	
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	<p>Worker code of conduct</p> <p>We note that, at ISH4, the Applicant (Mr Philpott) indicated they were willing to discuss how securing compliance with the work code of conduct could be achieved, and SCC would welcome such discussions. SCC considers that the content of the Worker Code of Conduct, in so far as it seeks to regulate employee behaviours that could have land use consequences/impacts (especially off-site), should be the subject of some sort of oversight by the Councils. A simple mechanism could be a requirement (or obligation) for the Worker Code of Conduct (or the parts with land use consequences) to be approved by the Councils (likewise any reviews/amendments of the same), for example through the appropriate Review Group. That could include the measures that the Applicant would take to implement the Worker Code of Conduct (including enforcing it with any sub-contractors), as well as monitoring requirements.</p> <p>Increase in public service demand on adult and children's services and schools and early years provision</p> <p>SCC anticipates that the increase of the population as a result of non-home based and home based workers will have an impact in terms of increase in public service demand, in adult and childrens services and on school and early years provision.</p> <p>Adult Service: We expect a general increase in demand for adult social services in impact area as a result of the increase population. the combination of increased competition for the workforce currently serving social care services, traffic delays, pressure on availability of on road</p>	
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	<p>parking in the community due to more houses in multiple occupation, further exacerbated by the perception of issues in the area, will result in increases in the cost of home care packages (delivered by care providers and commissioned by SCC) during the construction phase of Sizewell C. If unmitigated by the Applicant, this would result either in degradation of care i.e., less home care services being affordable in current budgets), the need to cut services elsewhere in the Council to fund the same level of home care, or the need to raise Council tax.</p> <p>Children's services: SCC expects an increase in demand for children's services. This demand is linked to community safety issues discussed above, and SCC notes that these issues do not typically stem from the child themselves – and therefore do not equate to the number of additional children brought by the project - but rather from the impact of adults on children. The issues can impact on dependent children of the Sizewell C construction workforce, children of partners with whom the Sizewell C workforce form relationships and young people with whom there is no familial relationship.</p> <p>This is further explained in SCC' Deadline 5 response to additional documents submitted at Deadline 3, in our response to comments from the Applicant on the LIR Chapter 27, with regard to Safeguarding and Wellbeing of Children and Young People (Ref 27.32-27.33).</p> <p>School and early years provision: SCC has a duty to ensure there are enough childcare and school placements. Based on the Applicant's forecast data, the additional child population will result in demand for additional school and early years places that will not be able to be met by existing spare capacity. We are approaching this in the same way as for a new housing development.</p>	
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	<p>Also, approximately 10% of these additional children can be expected to require funded school transport. In addition there is a likely need for pupil support resources such as support staff for English as Additional Language (EAL) and Special Education Needs & Disabilities (SEND).</p> <p>This is further explained in SCC' Deadline 5 response to additional documents submitted at Deadline 3, in our response to comments from the Applicant on the LIR Chapter 27, with regard to School Transport and School and Early Years Resilience.</p> <p>For all public services, SCC is in discussion with the Applicant about the appropriate approach to mitigate this, with the proposed mechanism of the Public Services Resilience Fund. SCC expects the applicant to mitigate the demand pressures to prevent a degradation of services to the existing population via the Public Service Resilience Fund with an emphasis on preventing needs arising and escalating.</p>	
Emergency services impacts	<p>SCC notes that the three emergency services (Fire, Ambulance and Police) are intrinsically interlinked, and impacts on each are inter-related.</p> <p>We expect that the Fire and Rescue Service crewing models may be affected should recruitment to the project impact in the Service area i.e. Fire and Rescue personnel leaving to undertake project work. The Service has a varied crewing model with the immediate area being On Call status whereby personnel respond to the station from their main employment/home on receipt of a call, traffic impact of personnel responding to these stations is a Service concern. The nearest wholetime, permanently crewed, stations are located in Lowestoft and Ipswich with a Blue</p>	

	<p>light response time of approximately 45 minutes. Recruitment of Operational personnel to a complete competent role takes 30 month.</p> <p>An increase in community safety initiatives in the immediate and surrounding area of Sizewell C will be required. We expect that Suffolk Fire and Rescue Service will need to be involved in site community safety initiatives, structured around the forecast issues, and in local area community safety initiatives required tailored to the local area and based on impacts of the project.</p> <p>Fire and Rescue community safety has a wide remit including areas such as domestic abuse cases, support to the vulnerable etc with the project likely to have an impact in the community safety arena (see comments above), and the service impact needs to be mitigated.</p> <p>A number of impacts are anticipated by SCC that will affect all emergency services in the are:</p> <ul style="list-style-type: none">○ Traffic Issues - impact on ability of emergency services / additional support to get to homes and incidents within the required times and the likely subsequent impact on risk to life/worker and Community safety.○ Regular site visits for local responders are a requirement with the use of technology applicable for provision of filmed and narrated overview of the site to capture all operational personnel through an efficient and effective mechanism.○ Periodic organised emergency service exercises conducted on scene to ensure responders are able to attend the site with response evaluated and debriefed.	
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Sports and recreation provision and assessment	SCC agrees and supports the views of East Suffolk Council on these matters.	
Effects of the freight strategy on the health and wellbeing of the local communities	<p>This topic area was not covered in the ISH due to time constraints, however SCC would like to make the following comments.</p> <p>Overview:</p> <p>SCC considers that there will be health and wellbeing impacts of the freight strategy in terms of:</p> <ul style="list-style-type: none"> - Impacts on health and wellbeing of road traffic - Impacts on health and wellbeing of train movements - Indirect impacts on community health as a result of impacts of congestion on the delivery of public services. - Indirect impacts as a result of potential delays in response times of emergency services (covered above) <p>Road traffic:</p> <p>With regards to road traffic impacts, changes that can affect health and wellbeing include:</p> <ul style="list-style-type: none"> • Road safety; • Reduced access and accessibility; • Severance; • Fear and Intimidation; • Air Quality; and • Noise. <p>Specific road infrastructure measures to mitigate for some of these impacts have been covered in ISH3. The development will result in a significant increase in traffic in</p>	

	<p>the local area, both on the main roads and using local roads, which will reduce road safety, and increase severance and fear and intimidation. The Transport Review Group through the Construction Traffic Management Plan will seek to mitigate unforeseen impacts through the contingency fund.</p> <p>Rail movements:</p> <p>Noise and vibration of proposed night time freight rail movements will result in health and wellbeing impacts for communities close to the railway line</p> <p>Indirect impacts on community health as a result of impacts of congestion on the delivery of public services (see also comments above). Extra pressure on the local transport infrastructure may impact our ability to provide community care (Home, Community, Residential, Supported Living), community health and relevant childrens community services (e.g. health visitors), in affected areas. Traffic congestion resulting in increased travel time between visits could lead to greater travel time between visits. This could make runs non-viable for care providers to deliver at current rates, and may increase care costs, and could also result in delays in delivery of care.</p> <p>To deal with these impacts, costs of delivery of care are likely to rise. This means that the population could face reduced levels of care provision in the area, or alternatively face Council tax increases, unless the Applicant provides suitable mitigation.</p> <p>We note that the Applicant indicated at the ISH that they will provide a note on economic costs and congestions at D5, and SCC will comment further on receipt of this.</p>	
Monitoring and mitigation measures	Monitoring of community impacts is considered to be key to enable swift responses to any impacts which do occur.	

	<p>However, the purpose of early intervention is to mitigate the risk of the issues arising, so evidence of a retrospective monitoring of effects to determine the release of contingency funding will not be a good measure of the impact had no early intervention occurred.</p> <p>For impacts relating to increased demand for services, the Applicant states that the Worker Code of Conduct will mitigate workforce behaviour issues. It is therefore important that there is a clear monitoring regime for the Worker Code of conduct, and that resources for monitoring are secured so that likely impacts can be identified, attributed, and mitigated on a reactive basis by the appropriate workstream.</p> <p>In principle, it is accepted that the Public Services Resilience Fund as a vehicle would be suitable for providing mitigation on many of the issues highlighted in this ISH. SCC is in discussion with the applicant on the appropriate scale of this fund.</p>	
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